

A Year in Higher Education 2023

Articles and blogs on higher education
from the Vice-Chancellor of LSBU

Introduction



A range of policy developments have affected the higher education sector in 2023.

Universities have been facing an increasingly interventionist regulatory regime through the Office for Students who published the first results from their 'boots-on-the-ground' investigations. LSBU was one of the first institutions to be reviewed, and while I was pleased the OfS identified no concerns about the quality of our provision and highlighted our many areas of good practice, the process generated a number of concerns, which I outlined in a blog for the Higher Education Policy Institute (p.12).

The Government finally responded to the Lifelong Learning Entitlement consultation, confirming that the LLE will be a full replacement for existing higher education student finance and Advanced Learner Loans. A credit-based fee limit has been enshrined in primary legislation, and it has also been confirmed that there won't be any Equivalent Level Qualifications restrictions.

Difficult economic conditions have put the role employers play in the UK's skills system under pressure. Some industry bodies have described the Apprenticeship Levy as a mistake and the Labour Party has committed to widen the Levy's scope beyond apprenticeships. Given the UK

already has one of the lowest levels of mandatory employer spending on training in the OECD, these criticisms must be addressed if we want to build a skills funding system which can sustainably provide future technical and vocational skills.

There has been more positive news in research where the Government created a new Department for Science, Innovation and Technology from the Department for Business, Energy and Industrial Strategy. The UK also associated with Horizon Europe and details of an expanded 2029 Research Excellence Framework were published by UK Research and Innovation.

As we look ahead to 2024, we will be following updates on the Lifelong Learning Entitlement as we enter the final year before rollout, preparing for the Home Office's measures to restrict visa access and reduce international student numbers, and monitoring the range of proposals made ahead of the General Election.

I have made policy interventions on these and other educational issues this year. I hope you find them interesting.

Professor D Phoenix OBE, DL,
FREng, FAcSS, FRCP(Edin), DSc

Contents

4

LSIPs will achieve little if we don't upskill workers

6

Those arguing for a graduate tax should look at the experience of Further Education – and be careful what they wish for

8

Which Whitehall Department should be responsible for English universities?

10

The apprenticeship levy cannot sit in isolation of place-based need

12

A Risk-Based approach – reflection of an institutional experience of the new quality assessment review by the Office for Students

16

Why a Technical Baccalaureate could help the capital meet its skills needs

18

DfE needs to tread carefully in its approach to non-prescribed qualifications

21

The role for Universities in improving skills: perspective from LSBU

LSIPs will achieve little if we don't upskill workers

FE Week, 8 January 2023

Last summer, I wrote for FE Week about factors that bodies developing local skills improvement plans (LSIPs) should consider if they want to make them a success. In the months since, the government has published its statutory guidance for the development of LSIPs. Stakeholders that include mayoral combined authorities, local enterprise partnerships and local authorities will come together to set out the key priorities and changes needed to make post-16 technical education or training more responsive and closely aligned to local labour market needs.

Given that the number of unfilled jobs rose to 1.3 million in March last year (the highest ever recorded), LSIPs evidently couldn't come soon enough. However, the solution is not as simple as a lack of responsiveness in our education system.

Although vacancies are high, there are also an estimated 6.2 million workers (19.8 per cent of the UK labour market) experiencing severely insecure work (defined as involuntarily part-time and/or temporary employment).

One possible explanation for this mismatch between supply and demand is that an estimated 9 million adults in England (of whom 5 million are in work) have low basic skills.

Basic skills are generally defined as a proficient level of literacy to comprehend, interpret and evaluate complex texts and a proficient level of numeracy to solve mathematical problems in a real context. In qualification terms, they are the equivalent to a level 2 (eg GCSE). Digital skills are also increasingly included within definitions.

While some of the 1.3 million vacancies are in technical professions such as nursing and software development, many others are in lower and intermediately skilled jobs such as care workers, sales and retail assistants,

cleaning and domestic staff, and trades such as metal working, carpentry and joinery.

Instead of amending post-16 provision – much of which is directly aligned to employer standards (such as T Levels, HTQs and apprenticeships) or informed by employer panels (such as many BTECs and City and Guilds qualifications) – supporting the 9 million individuals who currently lack basic skills would arguably be a more effective way of tackling labour market shortages. Level 2 English and maths qualifications would enable these individuals to fill many of England's vacancies directly or to continue in education to fill higher-skill roles.

At London South Bank University, for example, the NHS trusts we work with will sometimes propose health care support workers for our apprenticeship programmes, but they often lack the required level 2 English and maths qualifications for entry. The LSBU Group structure, which includes Lambeth College, enables us to run pre-enrolment programmes to help candidates overcome this. Over the next few years, the college will develop a "hub and spoke" model to increase the accessibility of its adult education programmes by delivering it in community buildings in the evenings.

Unfortunately, the government does not appear to have made this connection. A month before publishing the LSIP guidance, the Department for Education concluded its consultation on Implementing a new FE funding and accountability system, which proposed removing the ringfence for community learning within the adult education budget. This will hugely undermine the ability of colleges and local authorities to help adults (particularly those who are most disadvantaged) to make the first step back into education.

In the autumn statement, the chancellor committed another £2.3 billion to the core schools' budget while providing no extra funding for colleges or adult education; and just this week the prime minister announced an ambition for all young people to study maths up to age 18. Neither will help to upskill the 5 million adults already in the workforce, but insufficiently skilled to meet the demand for staff.

Sadly, this is setting up yet another well-intentioned policy initiative for failure. If the government truly wants LSIPs to support skills provision and local economic growth, it needs to invest in adult education.



Those arguing for a graduate tax should look at the experience of Further Education – and be careful what they wish for

HEPI, 26 January 2023

You would be hard pressed to find someone in either the higher education sector or Westminster willing to argue that the current funding system for universities is working well. The value of outstanding loans reached £182 billion in March last year. (By comparison, the current estimated cost of the entire Covid-19 vaccine rollout is £11.7 billion). At the same time, the unit-of-resource for teaching students is rapidly shrinking, with the £9,250 tuition fees now worth only around £6,600 in 2012/13 prices once inflation is factored in. And although the changes to the loan conditions coming in this autumn will increase the repayment term for graduates, generally there is little political appetite to increase the financial burden on students further by raising the loan cap.

It is somewhat inevitable then that the issue of a graduate tax has once again raised its head as a potential way of simplifying the entire process. While much ink has been spilt on both the positives and negatives of such an approach, I think one of the most compelling arguments against implementing such a system is to look at how other

areas of our education system which are funded through direct taxation have fared – namely further education.

Much of the graduate tax argument to date has focused on the fact that spending on higher education will never be a priority for ministers when it is in direct competition with schools, hospitals and pensions. As of November 2022, though, I believe this discussion around the unit-of-resource has been overshadowed by the shift caused by the Office for National Statistics's reclassification of FE colleges and sixth form colleges into the central government sector. This decision affects not only colleges themselves but any subsidiary bodies they might own – even if they are intended to be commercial in nature – by virtue of being controlled by a public sector body.

These changes are significant and mean that colleges, now being subject to the framework for financial management set out in *Managing Public Money*, can no longer take out commercial loans or financing – unless it's shown to be more cost effective than borrowing from the government.

This will no doubt raise questions about the ability of subsidiaries in particular to compete in commercial markets. But operationally, there will also be a range of additional controls, given the government effectively becomes responsible for the sector's position in terms of profit and loss.

In the last month, a number of colleges have had to suspend negotiations with private sector lending partners as they can no longer seek commercial borrowing. Although the Government has committed to providing an additional £150 million of capital grant funding in 2023/24 to make up for lost commercial loan income for planned estate projects, this apparently hasn't prevented Kendal College from having to halt their redevelopment to turn a disused shopping centre into a campus or East Durham College to pause their plans for a new multimillion-pound T-Level facility. In truth, even if the capital is available there is a question as to whether the Department for Education and Treasury have the culture, focus and appetite to be able to assess multiple commercial bids at pace, no matter how well-intentioned

officials are. According to the Association of Colleges, at least 20 colleges sought borrowing approvals from the Department for Education in December 2022 alone.

In 2021/22, the total amount of Education and Skills Funding Agency (ESFA) funding for 16–19 learning was £6.6 billion. By comparison, the Student Loans Company currently loans out around £20 billion to approximately 1.5 million students in England each year. If that money were funded by direct taxation, it is difficult to see how a similar reclassification wouldn't be on the cards for universities, which would present the sector with significant challenges given the reliance it has developed on private sector borrowing and commercial activity over the last decade. (In 2020/21 external borrowing represented 37.8% of aggregate English HE provider income.)

In reality, reclassification rests not simply on funding but an assessment of the ability of the government to intervene – which in turn would need consideration of the role of the Office for Students as an arm's length body. The experiences of the further

education section though suggest to me that those arguing for a graduate tax should be careful what they wish for – both in terms of the influence on the unit-of-resource and in terms of the potential impact on sectorial classification. While I would agree that the funding system needs review, we need to look more holistically at what we are seeking to deliver and then how the different aspects might be funded by a combination of Government grant, student loan and employer contribution rather than looking at each part in isolation.



Which Whitehall Department should be responsible for English universities?

HEPI, 29 June 2023

The universities brief has never sat easily within government. For many years, English universities were notionally the responsibility of the Department for Education but were effectively regulated via funding incentives via the Higher Education Funding Council for England.

In 2007, they were moved to the Department of Innovation, Universities and Skills (subsumed within the Department for Business, Innovation and Skills in 2009), where they remained until 2016 when Theresa May moved them partially back to the Department of Education while keeping their research responsibilities within the new Department of Business, Energy and Industrial Strategy (BEIS).

While this partial move back to the DfE recognised the importance of the sector to the country's taught higher education needs it has become increasingly clear over the last seven years that the complexity of universities' overall activity is not well understood or indeed a priority for DfE and those working within the Department therefore often seek to apply a schools mindset when it comes to regulation of what is just one aspect of their work.

The Department's focus is not on how universities could better foster innovation or train the next generation of researchers and academics. Instead, early-years, primary and secondary education dominate the Department's agenda and schools take up more than two-thirds of their budget. The 'back-to-work' Budget could, for example, have been an opportunity for the Department to present universities to the Treasury as their key priority for addressing England's skills needs given over 80% of

employers trying to recruit struggled to find individuals with the relevant qualifications and skills last year. Instead, extending free childcare to encourage parents back to work emerged from the Chancellor's speech as the Department's political priority.

This focus by the Department on schools is understandable but this, coupled with a simplistic deconstruction of universities to focus on undergraduate-level study out of the wider university context, is likely to be increasingly damaging to the sector and so to the country's future prosperity.

One could make the case that other Departments would be more ready to champion the role of universities if it was within their brief. And with the split of BEIS and the creation of three new Departments by Rishi Sunak earlier this year, the question of where universities should sit has once again raised its head.

Some have suggested that universities should move to the newly formed Department for Science, Innovation and Technology (DSIT) – including Lord Willetts, former Universities Minister, who has written about this in a new paper for Policy Exchange.

Moving universities into DSIT would make sense for obvious reasons – innovation and technology are key drivers of economic growth, and universities are major contributors to this through their research and development activities. Universities would be better placed to receive support and funding for their research and could work more closely with industry partners to develop commercial applications for their research.

As the Department responsible for UK Research and Innovation (UKRI), putting universities here would provide greater visibility for the important contributions they make to science and technology – encouraging greater public support and enabling this Department to look at the wider skills chain required for innovation.

There is a strong case however, that the Department for Business and Trade – another Department formed from BEIS – could be a suitable location. Universities play a vital role in developing the skills and knowledge needed for the future workforce – it is estimated that between 24% and 28% of jobs require a bachelor degree. In the UK, businesses have largely adopted the role of a consumer rather than a contributor in our skills system (unlike, for example, in Germany). By placing universities here, they would be better placed to engage with industry and work together to co-design qualifications, ensuring the future workforce have the necessary skills and future growth.

But other Departments should also have an interest in what Universities can offer. The Foreign, Commonwealth and Development Office could appreciate the importance of the sector's soft power and better support international trade and research collaborations. The Department for Levelling Up, Housing and Communities is well positioned to support universities' civic mission for example and of course universities make a significant contribution to the workforce requirements of the Department for Health.

Having a complex programme means there is no natural 'home' for universities. While it is positive that this Government seems willing

to treat research and innovation with the seriousness it deserves, recent Department reshuffles have made the issue of silos more prominent. Whitehall fails to identify the correlation between investment in innovation and demand for higher-level skills: the *Skills for Jobs* White Paper, for example, contained no references to innovation and the need to drive up demand for higher-level skills regionally, and similarly the Innovation Strategy makes no mention of skills.

In the approach to next year's general election, the temptation of short termism must be avoided and instead cross-departmental thinking must be pursued. The UK needs a technocratic approach to the future of skills, research and innovation and for universities to flourish it requires greater understanding of their contribution to society, the economy and international soft power which in turn requires greater communication between key departments. What is clear is that the deconstruction of what universities offer and the narrow focus of their current home is likely to limit the contribution they make and in the medium term the approach could further limit their own ability to innovate.

The apprenticeship levy cannot sit in isolation of place-based need

FE Week, 2 July 2023

A Policy Exchange report published in May called for widescale changes to the skills funding system; and an open letter sent by several major employer representative bodies back in February described the apprenticeship levy as a '£3.5 billion mistake'. The Labour Party has recently announced that it would transform the apprenticeship levy into a 'Growth and Skills Levy'.

While we do need to reflect on how we address weaknesses in the current approach to work-based education, we should also pause to celebrate the fact that since the apprenticeship levy came into effect in 2017 it has generated funding from business to support more than 1.75 million apprenticeship starts. This includes over 400,000 higher and degree apprenticeships. The department for education claim that, in England, 99.6 per cent of their ring-fenced apprenticeship budget (£2.455 billion) was spent on training last year, with less than 0.5 per cent of funding returned to the treasury.

With this in mind, I recently hosted a roundtable on the future of the apprenticeship levy with representatives from think tanks, professional bodies, representative bodies and Rt Hon The Lord Blunkett, who produced the Labour Party's recent Council of Skills Advisors' Report. Although there was much nuance to the discussion around the table, and a usual focus on transparency and bureaucracy with respect to the levy's allocation, a key theme that developed was around the importance of positioning the levy within a wider, place-based skills framework.

The apprenticeship levy was introduced to help address the market failure of under-investment in training by UK employers (currently less than half the EU average). However, it has arguably had limited impact in this regard, given that only 23 per cent of employers were offering apprenticeships in 2021 and over one-third of employers (39 per cent) have provided no skills development for their workforce during the past year.

There is a risk that our skills funding is creating a 'welfare state mentality' for employers. With that in mind, the government perhaps needs to consider using tax incentives or other funding levers to complement the levy in ways that encourage more employers to take ownership of this agenda, assessing their own future skills needs and investing in training, be that through apprenticeships or otherwise.

If skills development is to expand in a sustainable way, then as well as funding levers, we will need a clear skills strategy at governmental level to identify areas of skills deficit and focus on core growth opportunities like green skills, digital, engineering, biology and healthcare. The current lack of strategic oversight of how the levy is spent means it is currently subject to the individual decisions of 17,000 separate employers. While these employers will make the best decisions for their businesses, their choices will not necessarily align with wider government and societal priorities.

The identification of national priorities would help improve investment in infrastructure at a local level. That could be facilitated through the shared prosperity fund, for example, but linked to investment in local skills needs by local business beneficiaries. Without a clear strategy it is difficult to ensure work is joined up across different government departments and to understand not only where we should focus but what investment is needed for success.

If government provided a clear strategy, it could assess the funding needed to tackle shortfalls in level 2 and 3 skills. Currently, these shortfalls are unlikely to be addressed by business but these must be dealt with if we are not to fail 50 per cent of our young people. A dedicated fund to promote opportunities aligned to apprenticeships and training for learners from lower socioeconomic backgrounds could help to transform the skills pipeline as we develop our aspiration to be a knowledge-led economy.

This must be part of a clear skills strategy that helps support appropriately funded adult education through developed funding for core level 2 and 3. This plan must also incentivise employers to engage in skills development and align government departments to enable place-based focus within a national framework.



A Risk-Based approach – reflection of an institutional experience of the new quality assessment review by the Office for Students

HEPI, 12 September 2023

The Higher Education and Research Act (2017) is intended to be transformative. It introduces a risk based approach to quality oversight which is data informed and balanced with reviews where appropriate. Its ambition is to protect student interests and the reputation of the sector, whilst also allowing the number of providers to grow. Its intention was to also reduce regulatory burden on those institutions that meet threshold criteria.

At LSBU, we have been supportive of a risk based approach so when, in May last year, the Office for Students (OfS) said we would be one of eight providers whose business and management subject area would be reviewed, we were not too perturbed. We were confident of our offering and today's announcement from the OfS shows this confidence was not misplaced.

We are delighted that the report says there were no concerns about the quality of our provision. It highlighted many areas of good practice, and how we meet the needs of our diverse student body.

The academic experts who made up the review team saw, first-hand, the 'good rapport that our academics have with our students' and the way that our teaching staff have 'created a supportive environment for our learners'. Furthermore, the OfS review team recognised the long-term impact of our teaching, with up-to-date teaching and learning alongside a 'conscious and coordinated approach to integrating employability into the curriculum'.

It was especially gratifying to hear that our real-world approach to teaching and learning means that 'many assessments on modules are now explicitly employability-focused, offering students the opportunity to replicate tasks they might find themselves undertaking in the workplace'.

We appreciated how much time the assessors took to listen to and understand the needs of our students. The process also helped staff reflect further on their pedagogic and disciplinary approach and had some similarities with the Quality Assurance Agency subject reviews for those who have been in the sector long enough to be familiar with them.

But we do have some concerns about the experience. These are linked to a lack of transparency and the additional burden this creates as well as the media attention that was brought to bear on what should have been a routine event. With additional sector reviews now also undertaken in computer science and in relation to grade profile, an increasing number of providers have experienced this assessment approach and it seems timely to provide some reflections on the process.

When we were first informed that the OfS intended to assess our courses, we were keen to understand the basis for this investigation – especially as it was launched before the B3 (baselines for student outcomes) consultation concluded and indeed the OfS had indicated it was not therefore based on B3 indicators.

Throughout the process, we found the regulator resistant to providing a clear and transparent answer to this question. Its response was always that the investigation was 'in line with the OfS's powers under the Higher Education and Research Act 2017, which include the ability to proactively investigate whether or not a provider is complying with conditions of registration and/or whether there are any wider concerns that may warrant regulatory intervention'.

It is evident in our final report that there is still no clear explanation for why we were selected – with the report simply summarising the broad basis upon which the OfS has powers to initiate an assessment of any provider. We therefore found ourselves entering (and, as it has transpired, exiting) this process without any clear statement from the OfS.

Consequently, we had to prepare for the assessors potentially wanting to review every aspect of our provision. This necessitated high levels of preparatory work

from colleagues across the institution given there was a request for multiple materials as well as access to the virtual learning environment and an expectation that alongside student and staff meetings there would be teaching observations. We felt it was unreasonable not to be given a clear idea of the initial lines of enquiry at an earlier stage as it left everyone feeling this was more of a 'fishing trip' than a review taken against a clearly defined risk-based framework. This was uncertainty was exacerbated by the fact that the OfS had not recruited and trained expert assessors at the time we were notified. This meant it was several months before we were given any indication as to what the team might be interested in seeing and how they would proceed.

The process itself did, however, have several positives. Once the team were in place, we found them receptive to our initial feedback on the organisation of their visits.

The assessors took a rigorous and constructive approach,



encouraging us to provide evidence for the things we said, and giving us fair opportunity to do so. It was also good to see that the team included assessors from a range of institutions, reflecting the wider set of approaches to pedagogy in the sector.

But at the conclusion of our visits, we were once more subjected to a lack of clarity. Unlike an Ofsted inspection, where the lead inspector will offer school leaders a summary of their observations and provisional outcome, we were told we would hear from the OfS "in a few months".

We were unclear not only when we would hear, but what any assessor report might look like, how long we would have to review it, when the OfS response would be made and what range of outcomes it might contain.

During this time, we had to reassure staff who felt that they were under an uncertain and unclear scrutiny, and also support our student leaders and those students who were part of the assessment process. That we were able to do this without too great a fracture of staff and student morale is testament to the strong foundations that our business provision has. But it took its toll and there were colleagues who found this highly stressful.

Even now as the report is published, press releases from the OfS makes it clear they are yet to come to a judgement, saying '[w]e will now carefully consider their findings as we decide whether any further regulatory action is appropriate in individual cases'.

A final reflection on this process – and the news attention that has surrounded these assessments – is that providers are already very used to such scrutiny. Professional and regulatory bodies (PSRBs) have their own approaches to course review and validation, and in many instances the level of scrutiny can greatly exceed that of the OfS.

During such reviews, providers will routinely be given recommendations for areas to develop or enhance, and these recommendations are announced without any media fanfare. For example at LSBU, the majority of our students study on accredited courses and we work with over 40 PSRBs on our



undergraduate provision alone, with many more for our diverse postgraduate provision. When we are assessed, the reports generate useful insight and recommendations that lead to further course innovation, to the benefit of our students.

Issues around the burden of regulation have been discussed extensively in recent days but from our experience, one of the most significant implications of these visits has been the uncertainty and the related impact on the wellbeing of staff, compounded by the stories in the press on how reviews will find low quality provision. We have of course seen significant national discourse regarding the impact of Ofsted visits on the wellbeing of teachers and school leaders, and a commitment from Ofsted to do more to minimise the stress and uncertainty associated with some aspects of their inspection framework.

We know the OfS investigation has been difficult for everyone involved in this process, but it did not have to be this way, and we worry that there is a risk that the stakes have been raised too high. The new framework has much potential and, if the OfS can increase clarity and transparency (as the B3 work is beginning to do), it will be of great benefit for the sector, students, and colleagues who could approach the process without the anxiety it currently generates. It has to be recognised that an inspection team can review all aspects of provision but it is not unreasonable to expect information on the triggers. We also need to counter the current media hype around such reviews – as reviews like this are a core part of the new framework and I hope that in writing this it helps others feel more able to engage in constructive and open review that we are used to as a sector based on a model of learning enhancement.

It may be that many of the challenges we faced relate to teething problems with a new framework but we hope the OfS takes our feedback on board in the spirit of collegiality and that our experience helps to refine the process for other institutions.

Why a Technical Baccalaureate could help the capital meet its skills needs

London Higher, 30 October 2023

Since the Sainsbury Review of technical education back in 2016, the Government has sought ways to create a parity of esteem between technical and academic education. Notwithstanding the Prime Minister's recently announced plan to create a new technical-academic 'Advanced British Standard', one of the main solutions they have come up with is the creation of T Levels as a technical alternative to A Levels.

T Levels are based around specific occupational standards – such as Craft & Design or Engineering, Manufacturing, Processing & Control – and are designed to help young people progress into HTQs, advanced apprenticeships or directly into work within those sectors.

Although this is typically presented as providing young people with a 'choice' between academic and technical pathways at age 16, it is no such thing, since most young people will never have had the opportunity to sample technical education prior to this. Without the ability for young people to make an informed choice about the learning style and content that best suits them, any attempt to raise the esteem of technical education will be doomed to failure as it will remain a second choice for many.

It is for this reason that I recently set up England's first technically focused sixth form: South Bank University Sixth Form. In addition to offering technical qualifications to 16–19-year-olds, outreach work is central to the Sixth Form's delivery. By working with local secondary schools, it offers advice and guidance to pupils who are considering

following a technical education pathway as well as providing technical education taster sessions. For partner schools it will also deliver a technical qualification that can sit alongside the host schools' curricula. This includes a Level 2 BTEC in Health and Social Care taught in collaboration with Guy's and St Thomas's NHS Trust, which pupils from other schools and colleges are able to participate in one day a week whilst remaining on the roll for their own school. In this way, individuals can start to sample more applied ways of study, alongside their normal lessons at their own school. While this approach has a range of operational challenges, not least of which is timetabling, it is being well received and has really brought to focus the need for us to look more holistically at the offer for 14–18 year olds.

Our approach raises the question of whether there is potential for a wider 'Technical Baccalaureate Diploma' (TBacc) to promote technical routes and to provide a framework for thinking across the 14–18 age range given the extension of compulsory education. Such a framework qualification would build on existing qualifications and could therefore be quickly adopted.

I suggest it could include:

- The requirement to meet a minimum standard at Level 2 in areas of numeracy and literacy;
- A minimum of number of credits with respect to technical or applied learning (i.e. learning that includes competency assessment) at Level 2 with greater amounts expected at Level 3;
- An element associated with extracurricular activity to build wider skills – for example based on the national citizenship award scheme;

- An element linked to employability such as CV writing and an ability to show, through a reflective portfolio, how competency has been developed with respect to a given employment sector; and
- A work-experience element, such as the placement already embedded in the T-level but with more flexibility. (At SBU Sixth, for example, our Level 3 health students are able to apply for work-based experience at a local NHS Trust during the summer between years 12 and 13).

The advantage of this approach is that it could provide a framework which also aligns with local skills needs. Almost a third of 19-year-olds in inner London lack Level 3 qualifications while around 15% lack Level 2 qualifications. As a direct consequence of our failure to provide a suitable learning pathway for this sizeable minority of young people, 87% of construction employers in London believe their workforce lacks technical skills while half of London's manufacturing companies reported having open job vacancies due to skills shortages last year. Additionally, analysis for London's Local Skills Improvement Plan found that 43% of London businesses cited technical and skilled support roles as the most difficult to recruit.

Local approaches to increasing focus on technical education are beginning to develop. For example, since being granted greater local control over education and skills in the Trailblazer Deeper Devolution deal, the Mayor of Greater Manchester, Andy Burnham, has announced ambitious plans to create an integrated technical education offer with the introduction of the "MBacc" (Greater Manchester Baccalaureate).

The MBacc would sit alongside the existing academic EBacc (English baccalaureate) as a technically focused alternative for 14–16 year olds. In addition to the core subjects of English, Maths and Technology, students would study Engineering and Science courses to support progression to T Levels, BTECs and apprenticeships. Crucially however, the course would maintain enough commonality with



the EBacc to allow students to switch tracks later down the line if they find that technical education is not for them.

These initiatives should be applauded but I would suggest that nationally we would benefit from a TBacc framework that:

- Covers the 14–18 age range given the extension of compulsory education to the age of 18.
- Ensures that during 14–16 core knowledge (eg level 2 maths and English) plus technical skills taster sessions are available to allow real choice at 16.
- That there is a link to regional skills funding to support development of technical qualifications that meet local need and could form part of the 16–18 aspect of the framework.

Local London's recent Mind the Skills Gap report identified a clear need to shift to a more responsive and flexible approach to post-16 technical education and skills provision if we are to meet local labour market skills needs and employer skills demands. A TBacc – or indeed a London Baccalaureate – could provide a framework that helps promote and provide positive pathways into Level 3 technical study. This would offer an aspirational route to advanced and higher technical qualifications that promotes both career development and educational progression whilst addressing London's skills needs.

DfE needs to tread carefully in its approach to non-prescribed qualifications

Wonkhe, 16 November 2023

It is just over three years since then Prime Minister Boris Johnson announced his intention to create a new flexible loan system, equivalent to four years of study, to replace the current student finance arrangements.

The 2025 target date for the introduction of this new Lifelong Learning Entitlement (LLE) was confirmed several months later in the Skills for Jobs White Paper.

Since that announcement, the UK has had two more Prime Ministers, four more education secretaries, and two additional universities ministers but the LLE has avoided becoming a casualty of this ministerial churn and, to their credit, officials in the Department for Education (DfE) have stuck resolutely to the ambitious time scale that the government set for them to completely up-end the funding of tertiary education.

However, their approach, which can perhaps best be described as “work it out as we go along”, is storing up problems for the future.

The policy note, which the DfE published shortly after the Lifelong Learning (Higher Education Fee Limits) Bill received Royal Assent, sets out the work the department still intends to do, including multiple consultations and a second pilot scheme. While sector attention has largely been focused on the complexities of introducing modular-based study, there is another area of this which requires much greater scrutiny – and that is the LLE’s proposed replacement of Advanced Learner Loan (ALL) funded courses.

Advanced Learner Loans (ALLs) are the further education equivalent of university tuition fee loans. They are used to fund Level 3 courses that are not covered by the adult education budget and “non-prescribed” Level 4 and 5 courses.

“Non-prescribed” courses are those that, although awarded at a higher level, sit outside the higher education qualifications framework and are regulated by Ofqual. Rather than higher education providers, they are owned by awarding organisations (AOs) and professional bodies and are typically taught by colleges or training providers.

Award: AAT Level 4 Diploma
Credits: Not Specified (390 Guided Learning Hours)
Taught by: Wigan and Leigh College
Awarded by: Association of Accounting Technicians
Award: Human Resource Management Level 5 Diploma
Credits: 44
Taught by: City and Islington College
Awarded by: Chartered Institute of Personnel and Development
Award: Level 4 Diploma for Financial Advisers (DipFA)
Credits: 40
Taught by: ICS Learn
Awarded by: The London Institute of Banking & Finance

The Skills for Jobs White paper made it clear that a central characteristic of the LLE would be a unification of the student finance system for all loan funded provision across Levels 4 to 6.

In the first instance this means that prescribed Level 4 and 5 qualifications (such as HNCs and HNDs), will receive full student finance funding, whether they are taught in an FE or an HE institution, as long as they achieve the Higher Technical Qualification (HTQ) Kitemark from the Institute of Apprenticeships and Technical Education. This is a wholly positive development, which should open up more local learning pathways and create greater flexibility for prospective students.

But it also creates a question about what will happen to those non-prescribed qualifications that won’t be able to achieve HTQ status. Between December 2023 and early 2024, DfE intends to review all ALL-funded qualifications that have been funded for the past three consecutive years for evidence of learner demand and meeting of the following criteria:

1. That the qualification’s purpose and outcome statements support student progression into employment and/or higher education and training.
2. That there is clear employer endorsement for the qualification. This could include existing professional body recognition, an existing inclusion as a mandated qualification in an apprenticeship or other types of endorsement.

If a qualification, such as those examples listed, meets these criteria, it will theoretically become eligible for student finance funding. To facilitate this, the Office for Students (OfS) is expected to be asked to consult on the creation of a third permanent category of registration for the organisations teaching these qualifications – such as private training providers and professional bodies – which have not needed to register as a higher education provider up to this point. This will, presumably, bear some similarity to the basic category that the OfS initially proposed to include within the higher education provider register, but then later dropped in response to negative consultation feedback.

There are several reasons why the DfE should have second-thoughts about pursuing this process.

In the first place, funding such courses through the LLE will, from a learner perspective, give them the status of higher education qualifications even though a university or quality assured HEI is unlikely to have had any part in designing them. There is already an inherent risk that the LLE, in enabling students to build up their learning in chunks, may leave some learners with a collection of modules that don’t add up to a meaningful qualification, as has been seen in the development of micro-credentials in America, for example. The inclusion of non-prescribed qualifications exacerbates this risk, particularly if the criteria requires a course only to support progression into employment and/or higher education and training. While the DfE, OfS and IfATE will no doubt attempt to make the sign-off procedure rigorous, it also nevertheless creates a risk of train-to-gain style abuse of the finance system.



While universities can, and do, use accreditation of prior learning to recognise prior work, if a learner approached a university with 120 credits of certificates from professional bodies or awarding organisations I suspect there are few that would be willing to undertake the level of portfolio assessment required to enable access given there is no framework to assure their quality or relevance. As David Kernohan explains, it is difficult enough for institutions to facilitate credit transfer from other universities.

Putting these operational questions to one side, I have a greater concern which is one of principle. I believe there is a wider question about what function bringing such qualifications into the student finance system is supposed to serve. Many non-prescribed qualifications are related to specific occupational skills and involve professional bodies, which would suggest they *do* have clear employer endorsement.

But if this is the case, why then shouldn't employers be expected to fund them? Given there has been a 26 per cent drop in employer investment in training since 2005, the LLE should not provide an excuse for businesses to take further advantage of state and individual investment into a skills system of which they are one of the main beneficiaries. Since the level of employer investment per worker is half the EU average, the last thing we should be doing is transferring further burden from employers to students and the state – a risk that the OfS itself acknowledges.

The aims of the LLE to create greater flexibility within our higher education system is sound. It should not, however, be pursued at the risk of undermining the credibility of the higher education quality framework, nor should it risk further development of employers relying on a state benefit system for skills. DfE should give serious reconsideration about putting higher education and non-higher education qualifications on the same footing.

The role for Universities in improving skills: perspective from LSBU

London Higher, 20 November 2023

I was delighted to host colleagues in September from across Further and Higher Education at London South Bank Technical College (LSBTC) for a roundtable on how our sectors can work together to both support disadvantaged students and improve local productivity.

During our discussion I spoke about LSBU Group's unique structure which comprises South Bank Academies (SBA), South Bank Colleges (SBC), South Bank Innovation and London South Bank University. It represents one of the most comprehensive FE-HE collaborations currently in operation and required both Ministerial approval and secondary legislation to enable its development.

The model has brought with it several opportunities to build local learning pathways and facilitate skills innovation.

The first, and most tangible, is LSBTC itself where we hosted the roundtable. Bringing SBC into LSBU Group has enabled us to centralise numerous back-office functions including IT, HR, Finance and Procurement. As well as saving costs for the college, it has allowed them to draw upon the resources and expertise of a much larger organisation. Given our estates department had experience in largescale development projects and managing a multi-million-pound estate, LSBU was able to create an estates masterplan for SBC, which has enabled the construction of what is the first comprehensive technical college for a generation.

The skills system in England is severely disjointed – particularly for those learners that do not follow the GCSE to A-Level to university route. This manifests most prominently in the

lack of individuals qualified to Levels 4 and 5 and the 25% of young people who are not achieving Level 2 Maths and English by age 19. The integrated model of LSBU Group, however, provides numerous opportunities for tackling this at a local level.

We can conduct joint access and participation activity by working in an integrated way with SBA and SBC to identify risks to equality of opportunity facing different socioeconomic groups in schools and society. A more considered, tactical approach like this is more effective in increasing pre-16 attainment than by simply parachuting university staff and students on the ground in school settings and hoping direct contact with pupils will inspire them to continue in education. It also recognises the expertise in the school and college sectors rather than assuming universities can address an everincreasing list of social challenges on their own.

Our Group model, as well as our role as the Lead Provider of the London Uni Connect partnership, means we are well situated to identify the needs and aspirations of students before they enter HE. So, when a student enrolls at LSBU and completes their Personal Development Plan (a tool that signposts to the university any issues they may need support with) we are already aware of their areas of need and able to offer tailored assistance, ensuring that each learner is well placed to build the portfolio of skills, experience, and qualifications they need to achieve their ambitions. We are able to leverage this comparatively greater understanding of the incoming student demographic to build qualification pathways from Level 1 to Level 8, allowing us to meet both student demand and address local skills gaps.

This integrated approach to learning pathways also provides an opportunity for growing alternative routes into HE. Operating at a Group level enables us to align SBC's Level 4 provision with our courses, enabling advanced entry into the second year of relevant Bachelor's courses at LSBU for those learners that successfully pass their Level 4 and wish to continue their learning. T Levels and Higher Technical Qualifications (HTQs) similarly present an avenue for skills innovation between FE and HE; we can identify specific standards which match the skills needed for students to enrol onto Level 5 and 6 qualifications at LSBU.

In contrast, work between SBC and SBA enables us to run a 'fresh start' program for 14–16-year-old pupils at risk of exclusion. This is run by the college but links to SBA ensure learners are not excluded from mainstream education.

LSBU's Passmore Centre – our apprenticeship hub – works with employers to deliver more apprenticeship standards than any other university in the UK for nearly 3,000 apprentices. Our Group model means that we can offer standards from Level 2 to Level 7 with lower-level provision taught at SBC, enabling the Group to offer a one-stop-shop for our employer partners and providing progression pathways through the apprenticeship route. Progression rates from Level 3 to Level 4 within the apprenticeship system are very poor and a more holistic approach is needed to address this in collaboration with employers. One example is Level 3 Civil Engineering Technician Apprenticeship taught at the College, which provides direct entry into both the Level 4 Civil Engineering Senior Technician Apprenticeship and the Level 6 Civil Design Engineer Apprenticeship taught at the University.

However, not all prospective higher-level apprentices have the GCSE English and Maths qualifications necessary to enable them to even begin their course, an issue that is particularly prevalent in the NHS. Large numbers of healthcare support workers put forward by Healthcare Trusts to LSBU as Nursing apprenticeship candidates lacked the required Level 2 English and Maths qualifications. In collaboration with Health Education England and Praeceptor Consulting, SBC enhanced an existing qualification (a Level 3 Higher Development Award) while adding a corresponding Level 2 award, providing a logical pathway for healthcare assistants seeking to transition into different roles and access further education or higher apprenticeships. This approach has already won numerous accolades from the sector.

I hope these examples provide some insight into the potential of a more holistic place-based approach to education and they have been generated through leaders from schools, further and higher education sectors. Although we are already seeing impact from these various initiatives, it would be disingenuous to claim that creating LSBU Group has also not come with significant challenges.

Of these, the complexity of the regulatory landscape across tertiary education is probably the most prominent – particularly around apprenticeships and Level 4 and 5 qualifications where the Office for Students, Ofsted, Ofqual, the Institute for Apprenticeships and Technical Education and various professional, regulatory and statutory bodies (PSRBs) all vie for influence and set different expectations. Navigating this landscape can take significant institutional resources through much duplicated effort.

Although the Government has increased investment into further education in recent years, colleges continue to face financial pressures (as increasingly do universities) and one area where this particularly affects developing technical pathways is staffing costs.

Recruitment of staff to teach technical courses with skills gaps at FE is a continual challenge given prospective candidates can earn far more in the private sector. The disparity in general between HE and FE contracts can create further challenges, which we have sought to tackle in one way through extending LSBU's continuing professional development training to staff at SBC and SBA. But addressing the underlying unfairness of this two-tiered system is important if we want to facilitate consistently high-skilled teaching at FE level and create sustainable progression routes for learners through to higher levels.

The differences between FE and HE student record reporting systems is another operational challenge for universities seeking to collaborate with other post-16 providers. Training providers submit FE learner data to the

ESFA which maintains an individual record for each student, but no personalised information is recorded when HE providers send student data to HESA. This makes mapping student journeys more difficult because LSBU is unable to fully integrate our student record system with SBC.

Universities do have an opportunity within the current system to work collaboratively to provide student pathways which enable them to fill the skills gaps local employers identify. However, it is not an intuitive process, and working with FE institutions is certainly not encouraged. If we are serious about addressing productivity and fostering prosperity, we must build a more locally responsive, permeable tertiary system; ensure a greater coordination between Level 3–6 qualifications, and place universities on a sustainable financial footing.

lsbu.ac.uk

corporate.affairs@lsbu.ac.uk