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| **GuildHE response to IFA Strategic Guidance** |

1. GuildHE is an officially recognised representative body for UK Higher Education. Our members include universities, university colleges, further education colleges and specialist institutions from both the traditional and private (“for profit” and “not for profit”) sectors. Member institutions include major providers in professional subject areas like art, design and media, music and the performing arts; agriculture and food; education; maritime; health and sports.
2. We welcome the opportunity to comment on the first draft of the IFA strategy. The education sector is currently moving at a fast pace and there have been a number of significant changes being made to schools, colleges and HE providers through various legislation changes and reforms in recent months. The Skills White Paper set us a challenge to rethink how our education is delivered, and we welcome the re-focusing on Apprenticeships as part of that activity.
3. In general, we agree with what has been laid out in the draft strategy, but wish to outline our views on how this document could be strengthened.
4. Firstly, as was echoed in our joint letter with Universities UK to Robert Halfon MP, we are concerned that decisions about apprenticeships (including how the IFA and SFA will work going forward) are predicated on a traditional FE model of Apprenticeship delivery. The HE sector has been strongly encouraged and incentivised by both DfE and HEFCE to get involved in the apprenticeship agenda, and significant time and money has been invested by our universities in developing apprenticeship programmes at L5 and above. It is therefore of paramount importance that the IFA (and SFA) ensure that its operations work in the interest of all education sectors it serves and we would like to see a broader commitment to HE in the strategy.
5. For example, in the External Quality Assurance section of the strategy, only OFQUAL is listed as an external accrediting body, and we believe that they do not have jurisdiction to assess a degree level qualification. Instead the HE external examining system should take the place of OFQUAL for the purposes of degree level standards and assessments and QAA should take a more formal role in the assessment of quality of an apprenticeship.
6. The concept of end-point assessments could also be approached differently at degree level, (by virtue that they are more likely to have an integrated qualification built into the Apprenticeship programme) and the IFA should ensure that it has appropriately qualified academic advisers for standards at a degree level in order to assess the appropriateness of these activities.
7. The IFA should therefore include in its strategic actions to maintain quality oversight of providers, a commitment to ensuring that all types of assessment organisations are able to engage in the apprenticeship agenda, and ensure there are no structural barriers for HEIs to be a part of the design and delivery of apprenticeships. We would also like to see a more detailed statement on how IFA will work with the OfS, QAA (and HEFCE/the OfS) going forward, and to commit to QAA undertaking the quality assurance of degree level apprenticehips.
8. Another key strategic theme for the IFA is to ensure that skills gaps are identified and dealt with through its new role as the keeper of technical education. We have been working with DfE for the last few months to help find out why there are so few apprenticeships available in the creative industries. We have had a number of conversations now between HEIs, employers and Creative Industry bodies and much of the hold-up sits with the high number of SME employers in the industry. Therefore, we think the IFA needs to determine how it can develop apprenticeships and technical qualifications in sectors where there are no dominant employers. Whilst many employers may want to see standards and qualifications developed, many have no interest in putting themselves forward and committing to a time consuming and expensive process. It would also be beneficial generally if SMEs were included in some way for all standards development as their needs (and job roles) are often very different to very large employers in the sector.
9. Whilst we recognise both the Skills White Paper and the Industrial Strategy Green Papers are in their infancy, it would be useful if the IFA could produce some clearer thinking on how it plans to take the ideas from within these documents forward. We are especially concerned that by segregating technical from academic education a very clear divide emerges which could mean students are unable to cross boundaries once a specific path has been chosen. It also risks creating hard (and inaccurate) distinctions between academic and technical education and the institutions where that education takes place. Many of our members have a long history of doing both technical and professional higher education in areas like creative art and design, agriculture and land based professions and marine, as well as teacher education and the training of allied health professionals. We also feel this could complicate relationships between government and education providers who offer both technical and academic qualifications, and do not wish undue burden on either the FE of HE sectors.
10. Many of our HEIs frustrations with the current system stems from the processes laid down by the SFA. At present HEIs must be judged on FE criteria in order to get on the RoTAP and this has led to many rejections because of the different ways in which HE and FE operate. We wish to see more detail on how the IFA will be working with the SFA and who is ultimately responsible for designing the necessary processes in conjunction with sector agencies.
11. Finally, we are disappointed that there is no representation on the board by an apprentice. Many HE sector bodies (including HEFCE) have a student on their board to recognise the partnership between the participant and the policy makers. QAA have a student on the board as well as a Student Sounding Board which is a subcommittee of their main board and this works well in bringing the student voice through the whole decision making process. There is a long history of student representation on decision making bodies in HE and we would like to see this commitment extended to the FE and Apprenticeship sector. NUS have undertaken a lot of work in bringing together the voices of apprentices, and we strongly encourage the IFA to talk with them on the best ways to engage apprenticeships in the strategic direction of the organisation.