

Response to the public consultation on strengthening the levels 4 to 6 technical education system





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Foreword

The past few years have seen reforms to technical education, contributing to the ongoing work to create a high-quality, consistent and coherent landscape. The Institute for Apprenticeships and Technical Education (IfATE) has played a central role, driving up the quality of apprenticeships and using its approval powers to ensure technical qualifications (T Levels, level 2 and 3 technical qualifications and Higher Technical Qualifications (HTQs)) are high-quality.

Responsibility for promoting an effective, responsive technical education system will now be passed to Skills England, the new executive agency of the Department for Education. Skills England's role is to bring together central and local government, businesses, training providers and unions to meet the skills needs of the next decade across all regions, providing strategic oversight of the post-16 skills system aligned to the government's Industrial Strategy.

Technical qualifications and apprenticeships must be directly informed by the needs of industry, so that they equip students for skilled employment. IfATE has ensured technical education products meet employers' needs by using occupational standards as their foundation. Designed by employers, these standards set out the knowledge, skills and behaviours needed for each occupation. These activities form the basis for a robust system that delivers the skills employers need.

Too few students currently have technical skills at levels 4 and 5. To promote a productive and competitive workforce, this issue must be addressed. HTQs were a first step in redressing the system imbalance but the system needs to go further. A cornerstone of ensuring the quality and relevance of technical qualifications has been an approvals system based on a framework of qualification categories. Expanding this framework to include additional categories at levels 4, 5 and 6 aims to increase skills attainment at these levels and be a natural evolution of the existing system.

The categories proposed in the consultation offer flexibility for approving technical qualifications serving a variety of essential workforce needs, with approval based on the needs of employers. Once they have gained this quality endorsement, they will be considered for funding through the Lifelong Learning Entitlement (LLE). The proposed categories support the approval of these qualification types:

- professional technical qualifications (level 6) give students the opportunity to gain skills to enter an occupation by building on existing lower-level competence
- additional specialist technical qualifications (levels 4, 5 and 6) give students the opportunity to specialise in niche or emerging skills areas

- occupational progression technical qualifications (levels 4, 5 and 6): give students the opportunity to study in a multi-disciplinary way, building their skills in areas not limited to a single occupational standard
- employer proposed technical qualifications (levels 4, 5 and 6) give students the opportunity to build their skills in areas not yet covered by occupational standards

Modular qualifications will be a major part of the new system, offering students and employers smaller, more flexible learning packages. A modular system has great potential. Responses to the consultation indicate that the concept of modular has wide system support. Collaboration across the system will now be necessary to make it happen. Good quality modular qualifications will be vital from the outset, to promote confidence in the concept, stimulate demand and increase awareness of what a modular approach can offer. The key to an effective modular system lies in establishing demand for qualifications and ensuring they are understood by users. Categories-based approval of technical qualifications built around occupational standards provides a solid foundation and common reference point. This acts to simplify the system for qualification users.

The responses to this consultation will play a vital role in shaping the system, one which is able to deliver a compelling lifelong learning offer.

Executive summary

This consultation launched on 16 January 2024 and closed on 8 April 2024. IfATE used a range of communication platforms to ensure a wide response to the consultation. IfATE held eight broad engagement events with stakeholders and also engaged in more specific engagement events, including across 15 Route Panels.

In total, the consultation received 24 direct responses, 19 of which were via the online questionnaire, gathering the views of:

- Employers
- Representative bodies
- Awarding bodies
- Education and training providers
- A range of other organisation types

(More detailed analysis of respondent types is at Annex A)

For each question, the total number of responses has been included in the question response summary. This figure is the number of responses that were structured to answer the questions directly (received both via online questionnaire and email). Some email responses were not structured this way, using a more freeform narrative approach to sharing insights. In these cases, relevant response elements have been included within the question response summaries and are not reflected in the response totals.

The consultation asked for respondents' views on three main topics: the proposed categories for technical qualifications; modular design and communication; and ensuring accessibility within the system. The primary purpose of the consultation was to inform the strengthening of the levels 4 to 6 technical qualification system.

Section 2.1 of this document covers the questions posed by IfATE on the specifying of categories to allow technical qualification approvals. Questions 1 to 11 of the consultation related to this topic specifically.

Responses indicated agreement that further technical qualification categories at levels 4 to 6 would facilitate the provision of higher-level skills, opening up alternative pathways and addressing skills gaps.

Respondents supported the flexibility and potential for upskilling presented by the categories. They felt that qualifications approved within the categories would be likely to: play a role in addressing role diversity; widen student participation; and support the development of skills in specialist areas.

Section 2.2 covers the questions posed by IfATE on modularity, including how module outcomes could be explained and how modular assessment

should be designed. Questions 12 to 17 of the consultation related to these topics specifically.

There was agreement on the importance of balancing structure with flexibility when defining module outcomes. There was also support for basing module outcomes on knowledge, skills and behaviours, to define what a module enables a student to develop. A review of responses on this topic indicated that more work is required to socialise and build consensus in this area.

Responses to questions of design were supportive of IfATE's non-prescriptive approach. There was general agreement with IfATE's single proposed approval criterion linked to the need for holistic assessment. Overall, ensuring innovative approaches were not stifled by over-prescription was seen as essential to enabling a modular system to succeed.

Section 2.3 covers the questions posed by IfATE on promoting accessibility in the system. Questions 18 to 20 of the consultation related to this topic specifically.

Responses centred around the importance of ensuring that IfATE's approvals consider accessibility and equality, focusing on how IfATE might review the accessibility of qualifications. Respondents stressed the need for approvals to be streamlined and proportionate, ensuring that sufficient qualifications were made available to support students' needs.

The importance of student experience was highlighted, particularly for modular learning, to ensure all students feel a sense of belonging and inclusivity. This was reported as especially important for students with disabilities and other protected characteristics under the Equality Act 2010.

Throughout the consultation and in IfATE's associated engagement events, Careers Education, Information, Advice and Guidance (CEIAG) was raised as an essential element in delivering an effective modular system.

This document is structured as follows:

- Section 1: summarises key decisions
- Section 2: details the consultation responses submitted for each question
- Section 3: summarises the engagement events that took place during the consultation period
- Sections 4 and 5: present IfATE's updated impact assessments
- ANNEX A: provides a breakdown of types of respondent

Key decisions.

QUESTION	IfATE RESPONSE
<p>1. Do you agree that IfATE should define a category of qualifications for approval that deliver occupational entry competence by aligning to an occupational standard at level 6?</p>	<p>Responses to this question showed agreement on the need for this category of qualifications. The category may therefore be specified in a future approval framework.</p>
<p>3. Do you agree that IfATE should define a category of qualifications for approval that deliver additional specialist competence by building on occupational standards at levels 4, 5 and 6?</p>	<p>Responses to this question showed agreement on the need for this category of qualifications. The category may therefore be specified in a future approval framework.</p>
<p>5. Do you agree that IfATE should allow approval of additional specialist qualifications that build on a standard at the level directly below the qualification level? (if yes, please provide details of any areas in which you see this as a particular need)</p>	<p>Responses to this question showed agreement on the need to have this facility within the additional specialist category. It may therefore be included in a future approval framework.</p>
<p>6. Do you agree that IfATE should define a category of qualifications for approval that deliver cross functional and/or progression competence by selectively covering outcomes from one or more occupational standards at levels 4, 5 and 6?</p>	<p>Responses to this question showed agreement on the need for this category of qualifications. The category may therefore be specified in a future approval framework.</p>

QUESTION	IfATE RESPONSE
8. Do you agree that IfATE should define a category of qualifications for approval that deliver occupational entry competence against an occupation at levels 4, 5 and 6 where no occupational standard exists?	Responses to this question showed agreement on the need for this category to enable qualification approvals. This category may therefore be specified in a future approval framework.
12. How can IfATE, through its approvals process and sharing of skills insights, best enable the technical education system to respond to emerging skills needs?	<p>IfATE will continue exploring ways for government to inform stakeholders about new and emerging skills needs. This includes its SkillsCompass work. This work aims to capture, analyse and present a range of data sources, including LMI and fore sighting data, to identify changing labour market demand.</p> <p>Reflecting emerging skills in qualifications will continue to be important within the system, with processes aiming to support this.</p>
13. Do you agree with IfATE's proposed definition of a module outcome?	Due to the nuanced nature of the responses and the clear steer to balance structure and flexibility, further work will be needed to build consensus in this area. Work will be undertaken with DfE, OfS and Ofqual, as well as other appropriate stakeholders, before specifying any expectations in this area.

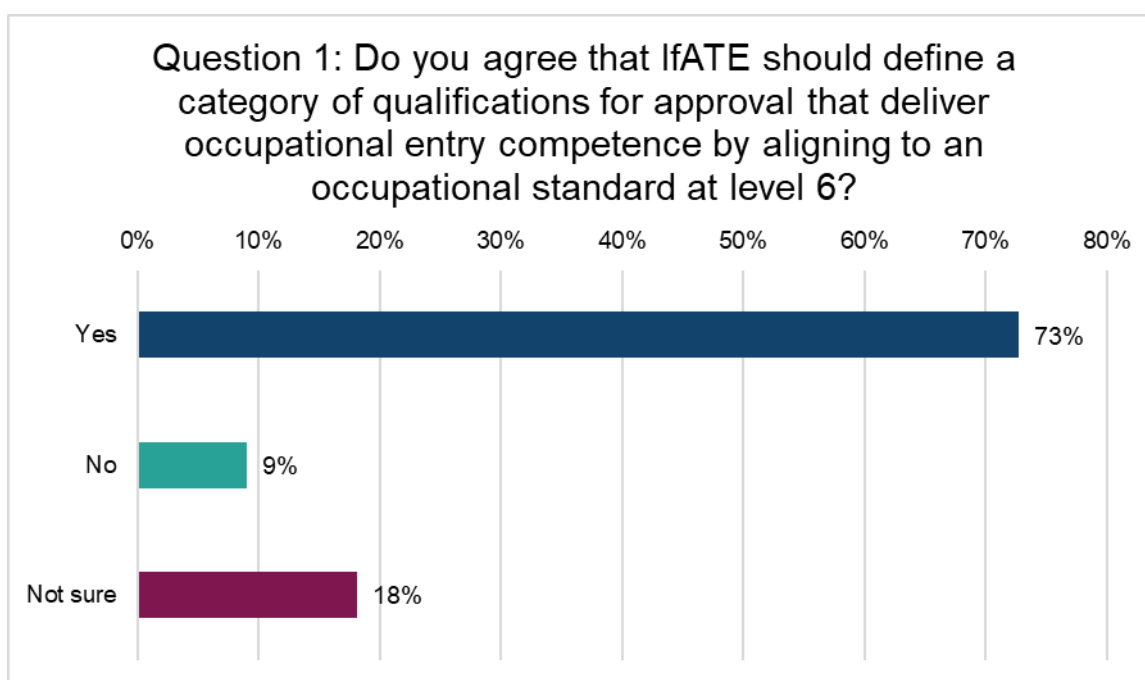
QUESTION	IfATE RESPONSE
<p>16. Do you agree with the design principles for modular qualifications set out by IfATE?</p>	<p>The proposed modular design principles will be refined in response to feedback and are likely to feature within a future approval system.</p> <p>Government organisations will work together to ensure the approval and regulatory system for modular qualifications is coherent and proportionate.</p>
<p>18. What elements could be included in IfATE's approvals process to strengthen requirements relating to accessibility and EDI in qualification materials and assessment?</p>	<p>Future approvals systems will continue to ensure EDI issues are considered in qualification development.</p> <p>The EDI toolkit is currently used in the development of occupational standards to ensure adherence to good EDI practice. Promotion and use of the toolkit is likely to continue.</p> <p>Assessment strategies are likely to continue to form part of approvals submissions. These strategies are required to include information on approaches to accessibility of assessments, including reasonable adjustments.</p>

Consultation responses

Qualification categories

Question 1: Do you agree that IfATE should define a category of qualifications for approval that deliver occupational entry competence by aligning to an occupational standard at level 6?

There was strong agreement from respondents to this question. 73 per cent said that IfATE should define a category for this purpose. Nine per cent disagreed with the proposal. 18 per cent were not sure.



Total number of responses to this question: 22

There was agreement that this category would meet employer need by giving students the chance to build on level 4 and 5 skills. This provides technical progression pathways to level 6. This could help address skills gaps where there are currently only degrees offered at this level. It would enable students to gain relevant qualifications flexibly, throughout their career. This also gives a potential progression route into postgraduate study and level 7 apprenticeships. It would support development of level 7 skills, helping meet the economy's needs at that level.

There was some agreement that alignment with occupational standards would give qualifications relevance and clear purpose. It would also help make outcomes and skills across similar programmes consistent. This would ease movement between them.

Responses highlighted the need for these qualifications to have a clear purpose and role in lifelong learning. This would explain their use in establishing occupational entry competence and enabling progression within a

broad workforce area. It should include being clear how the qualifications link to standards set by Professional, Statutory and Regulatory Bodies (PSRB), including their use in professional recognition. One respondent said it was important to have categories that differentiate qualifications linked to a standard from those that aren't. Defining the purpose of this category as occupational entry would help describe the nature of competence that qualifications approved in the category aim to establish. It would also differentiate their purpose from that of apprenticeships.

IfATE recognises how important it is to explain the purpose of technical qualifications. IfATE believes the use of occupational standards and categories supports this. As part of approval activity, IfATE currently consults PSRBs to ensure qualifications meet their needs, alongside meeting IfATE approval criteria. IfATE also encourages awarding bodies to work with PSRBs in the development of qualification materials. Where qualifications have direct links to PSRB requirements, it is expected that awarding bodies show this in their qualification materials.

IfATE response: Responses to this question showed agreement on the need for this category of qualifications. The category may therefore be specified in a future approval framework.

Question 2: Are there any other elements IfATE should consider when specifying this category, to ensure it delivers its stated intention?

Respondents noted the importance of clear links between proposed level 6 qualifications based on occupational standards and existing level 6 qualifications. This was seen as important to ensure a joined-up approach between 'technical' and 'academic' education. IfATE recognises the importance of level 6 qualifications being clear and easy to use.

One respondent thought it essential to have clearly defined careers pathways linking these qualifications to earlier stage qualifications, education or training. The respondent thought that IfATE should provide clear information on where these qualifications sit within occupational routes and pathways. Another respondent highlighted the need to invest in raising awareness of these qualifications, in the midst of significant recent system reforms. Employers must be able to understand how they compare with other qualifications and what each means for occupational competence. Another highlighted the importance of having distinct propositions for each qualification, so that prospective students can make choices that best suit their needs and circumstances. It should be noted that the [Occupational Maps](#) aim to include information on all approved technical qualifications and their place in the system at levels 4 to 6.

Responses focused on the need to have a clear approvals process. One respondent asked what proportion of an occupational standard a qualification would need to cover to reach "most" of the knowledge, skills and behaviours

(KSBs). Another highlighted the importance of students and employers understanding what a qualification covered. Another respondent commented on the varying minimum size and content requirements across different occupational standards. They felt there should be size guidance, with flexibility allowed where employers support a qualification with a smaller number of credits. To note, there is currently no intention to impose size requirements for any categories. Credit sizes were suggested in the consultation for guidance only. Currently, each submission to IfATE is judged on its merits, with the size of each qualification considered in relation to its stated purpose.

One respondent stated that higher level roles are not only about the technical aspects. They are also about the broader thinking that informs decisions around technical competency. This enables students to explore approaches to technical issues, selecting from a range of solutions. This is evident in the apprenticeship model.

One respondent asked whether “kitemarks” or brands would be used, as with HTQs. They felt that support and branding could promote awareness. Another highlighted the implications of any branding on how categories are interpreted and understood by students, their parents, providers and employers. It should be noted that there are currently no plans to extend kitemarking to include other technical qualification categories.

The topic of competence was also raised by respondents. One talked about the development of competence and how this required workplace assessment, for example, in NVQs. Another highlighted end point assessment as a way to show a candidate is competent. To note, qualifications within this category are described as providing ‘entry competence’, with a need for further learning and/or training to reach competence.

A suggestion was made to reframe the Employer Demand Test as a test of “industry” demand. This would recognise the significance of freelance professionals and broader workplace applications at this level. This is important in sectors like creative, where there is a growing market for technical qualifications. It should be noted that the Employer Demand Test is a legal requirement and forms the basis for technical qualification approval decisions. IfATE currently considers the nature of the relevant industry when assessing employer demand test evidence.

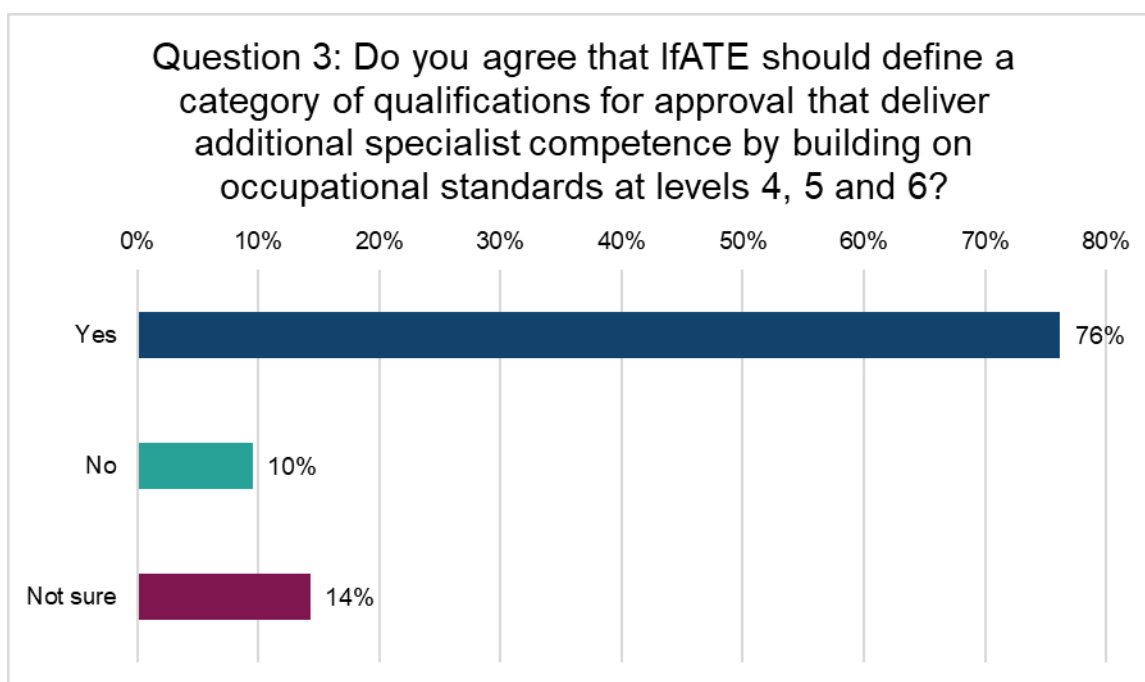
Total number of responses to this question: 16

IfATE response: Where this category is used, comprehensive criteria and guidance would be provided on use of the professional technical qualification category. These will clearly explain its purpose, structure, relationship to occupational standards and requirements for employer demand evidence.

IfATE will continue to promote the [Occupational Maps](#) as a key source of information for understanding, planning and communicating technical education pathways.

Question 3: Do you agree that IfATE should define a category of qualifications for approval that deliver additional specialist competence by building on occupational standards at levels 4, 5 and 6?

There was strong agreement (76 per cent) that IfATE should define an approval category in this area. 10 per cent disagreed with the proposal. 14 per cent were not sure.



Total number of responses to this question: 21

Respondents' support centred on the category's flexibility and how it can build on occupational standards that won't cover all specialist skills. This would give opportunities for people to upskill flexibly and gain competence in specialist areas. One respondent thought it would address role diversity within occupations. Another stated that it would promote wider student participation than current Higher Technical Qualifications (HTQ) alone. There was some agreement that this category would offer flexibility and be responsive to emerging skills needs. An agile approval system would be needed to realise these benefits. IfATE is aware that approvals should be efficient and enable reactive skills solutions.

One respondent pointed to a need for clear progression routes in areas that are very specialist. Good CEIAG was a theme in responses all through the consultation. An aim of the occupational maps is to be a basis for high-quality CEIAG.

One respondent was unsure of the demand for this category, saying that modules of large qualifications would do the same job. IfATE criteria do allow for additional content in HTQs and similar courses. To note, this additional content can be included to target specialist skills and modules of these courses can be made available stand-alone, to meet some emerging skills

needs. IfATE views the Additional Specialist category as providing flexibility to ensure specialist stand-alone qualifications are also available in the system.

One respondent pointed to the need for qualifications to link to professional standards. To note, IfATE currently requires awarding bodies to work with PSRB in the development of qualifications. IfATE also speaks to PSRB as part of its approval activities. Those who disagreed provided no additional explanation.

IfATE response: Responses to this question showed agreement on the need for this category of qualifications. The category may therefore be specified in a future approval framework.

Question 4: Are there any other elements IfATE should consider when specifying this category, to ensure it delivers its stated intention?

Responses to this question centred on: ensuring the category definition and purpose are clear; how qualifications in the category relate to occupational standards; and how approvals work. There was some agreement that defining terms clearly would help students, employers and providers. Respondents pointed to the importance of establishing what would be thought 'specialist'. Respondents asked for clear information on evidence IfATE would need for approval decisions. They also asked for clear information for applicants on showing how a specialist qualification relates to an occupational standard. In addition, respondents thought that the approvals system should consider pre-requisite qualifications and competencies required to gain these qualifications. This would ensure specialist qualifications delivered specialist outcomes, in addition to those that may have been gained through an occupational entry qualification.

The need for standardisation was also raised, including whether IfATE should seek to standardise specialist qualifications in specific skills areas. IfATE's view is that too much prescription can stifle system agility. Any requirements for approval, for example, a qualification's relationship to standards, would be set out in approval criteria.

There was some agreement on the need to ensure appropriate employer input. One respondent questioned how industry demand would be taken account of when deciding the relevance of a set of KSBs to a specialism. Another said that, despite its importance, some industries face difficulties gaining employer support due to the work being mainly freelance. Technical expert input should be encouraged here, to avoid a reliance on employers. As noted earlier, the nature of the industry is considered when applying the employer demand test.

Respondents thought this category could enable students to continue their learning and career progression if they needed to stop an apprenticeship due

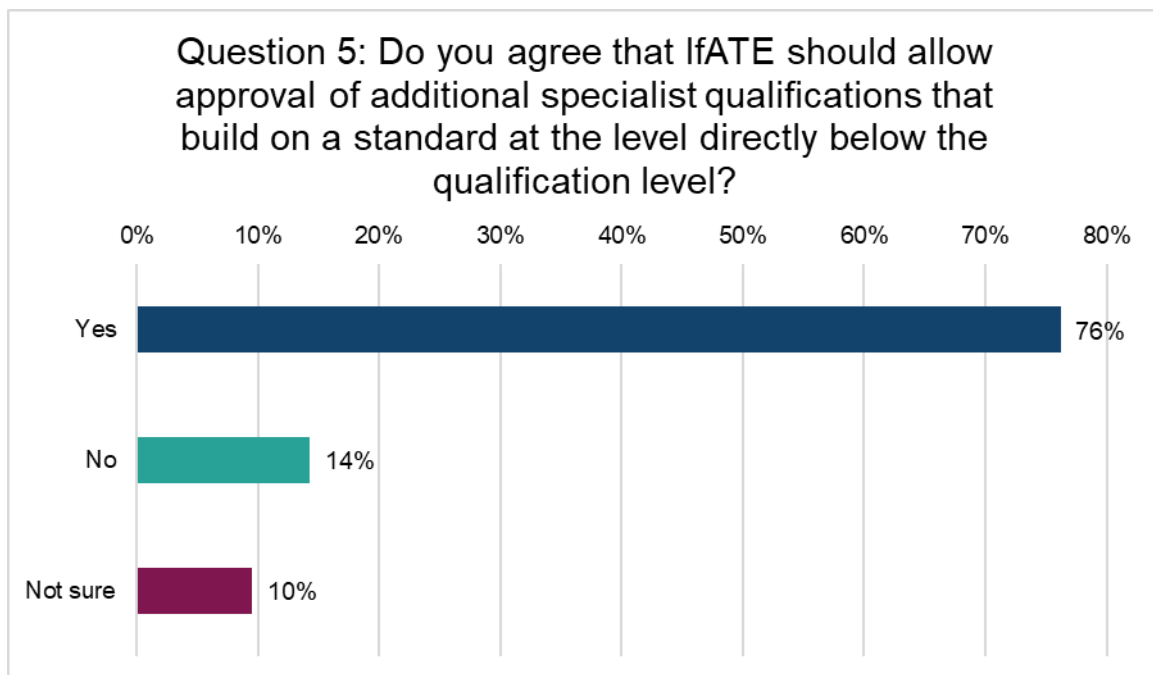
to a change of role or employer. They could do this by taking specialist modules to help them move to another apprenticeship or choose to study modules relevant to their new, more specialist role. A system built on occupational standards will help these moves, whether students are taking a qualification or on an apprenticeship.

Total number of responses to this question: 17

IfATE response: Where this category is used, comprehensive criteria and guidance will be provided on use of the additional specialist qualification category. These will clearly explain its purpose, structure, relationship to occupational standards and requirements for employer demand evidence.

Question 5: Do you agree that IfATE should allow approval of additional specialist qualifications that build on a standard at the level directly below the qualification level? (if yes, please provide details of any areas in which you see this as a particular need).

There was strong agreement (76 per cent) that IfATE should approval of additional specialist qualifications that build on a standard at the level directly below the qualification level. 14 per cent disagreed and 10 per cent were not sure.



Total number of responses to this question: 21

Support for the proposal centred on a belief that specialisms can cross level boundaries. This is necessary to support upwards and sideways career progression within and between roles. Respondents agreed that students should have flexible, funded routes that give learning opportunities for return to a career, upskilling or retraining. This would increase employability by

promoting a continuing professional development (CPD) culture. It would drive workforce improvements and expansion in niche skills areas. One respondent said that this would help meet government strategic sector skills goals.

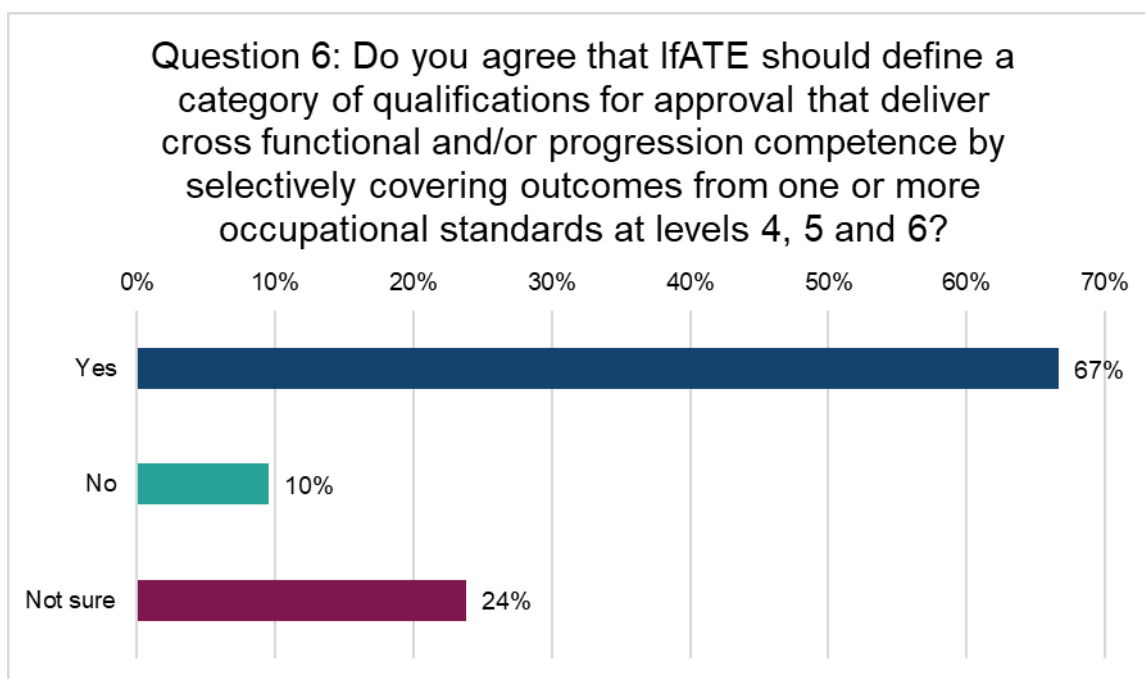
Disagreement centred on a lack of clarity about how this would work in practice and suggests a need to find good working examples.

IfATE response: Responses to this question showed agreement on the need to have this facility within the additional specialist category. It may therefore be included in a future approval framework.

Future of categories would be supported by real workforce examples.

Question 6: Do you agree that IfATE should define a category of qualifications for approval that deliver cross functional and/or progression competence by selectively covering outcomes from one or more occupational standards at levels 4, 5 and 6?

There was considerable agreement (67 per cent) that IfATE should define a category in this area. 10 per cent disagreed and 24 per cent were not sure.



Total number of responses to this question: 21

Agreement centred on the need for multi-disciplinary roles to be addressed in a flexible and agile way. Respondents pointed to the changing nature of roles and the need for pathways to represent workforce trends. This would let people train in ways that suit their situation and workforce requirements. This is important for roles in areas like management, human resources, finance and marketing, which operate across different industries, in both the public and private sector. The progression opportunities would benefit the student and employer. It was generally felt that this category would increase

qualification diversity, allowing approval of those not aligning to a single occupation.

A point was made about future roles, which often emerge in fields with fast-moving technology. A deft response is vital to develop knowledge and skills that enable progression in these areas.

One respondent felt that using several occupational standards would be helpful for small to medium-sized enterprises (SME). The proposed qualifications would be more engaging for SME employees whose responsibilities are often broader than those described in a single occupational standard.

Respondents that disagreed focused on the proposed category title and its purpose, and how qualifications in the category would be developed. One respondent felt the title did not reflect its purpose and there needed to be a distinction between the proposed use here and for other levels. A more general concern centred on the flexibility the category offered, compared to the others. This may cause problems determining the amount qualifications link to occupational standards. Ensuring a fair and consistent approach to this would be important. IfATE is aware that the flexibility of this category means that it needs to be clearly explained.

As with other categories, respondents felt it would be helpful to have more examples of how this would work in practice. This would help to clarify its purpose and gauge demand for it.

IfATE response: Responses to this question showed agreement on the need for this category of qualifications. The category may therefore be specified in a future approval framework.

Any future use of this category for approvals would be supported by published criteria and guidance making submission requirements clear to applicants. This would likely include how applicants ensure the outcomes targeted by the qualification meet the intent of the category.

Criteria and support materials would make clear how this category differs from those at levels 2 and 3.

Future of categories would be supported by real workforce examples.

Question 7: Are there any other elements IfATE should consider when specifying this category, to ensure it delivers its stated intention?

Responses to this question centred on how the category would work in practice, and students and employers being sufficiently informed to choose between qualifications.

Again, there was some agreement that future roles will blend different functions in the economy. Qualifications would need to mix duties or activities not found in just one occupation. Respondents posed questions such as 'How much coverage of the different standards will be considered sufficient?' and 'Could a qualification cover KSBs from multiple standards at different levels?'. While blending duties gives opportunities for qualification design, it could also cause issues. One respondent noted challenges mixing knowledge and skills from occupational standards at different levels. Another respondent felt the category would better suit closely related occupational standards. It may be complex for occupational standards not part of the same 'family' to be mixed. IfATE recognises the need to be clear on this issue.

One respondent thought it important to have distinct qualification offers. This would help students understand why they should choose one route over another to suit their needs best. Another asked how students and employers would understand how much of a standard a qualification covers. IfATE's view is that awarding bodies should give qualification users clear information about the qualification's intent. They can support this process by publishing the qualification mapping to the KSBs in the relevant occupational standards.

Linked to the issue of competence, respondents pointed to the need for care using outcomes outside their original context. This is likely to happen when mixing standards. It should not affect students' ability to apply skills and knowledge learnt within their own working life. IfATE's view is that qualifications with outcomes from standards in a different context should clearly demonstrate how they meet the qualification's purpose.

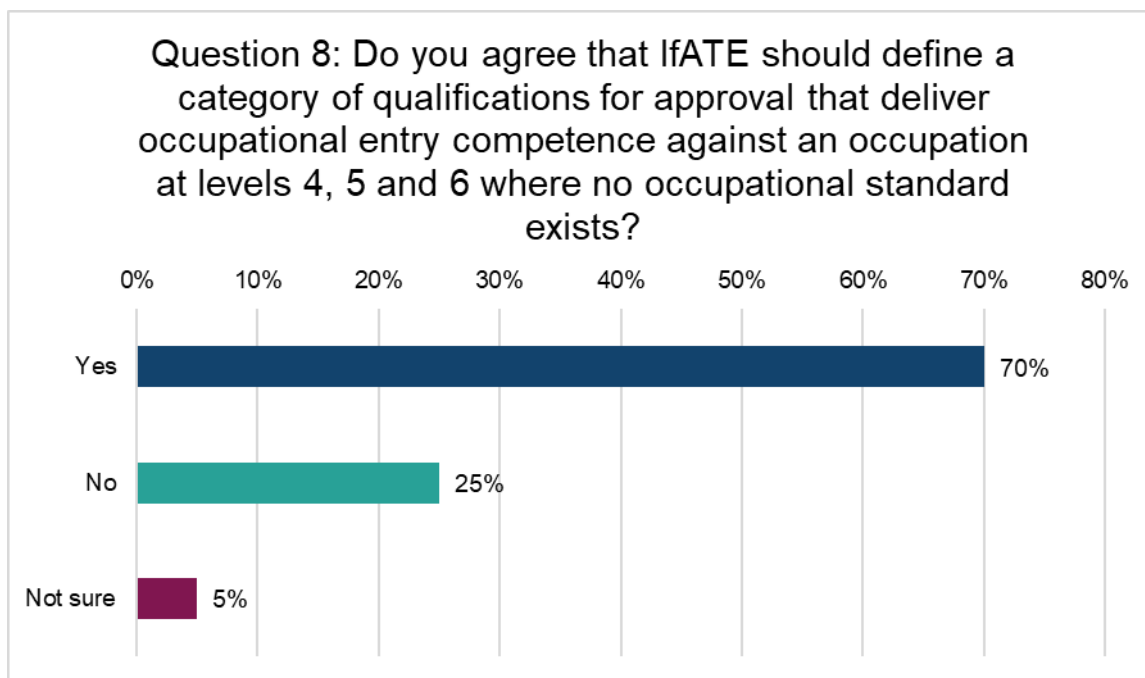
It was felt that this category could provide additional pathways and flexibility for students who may be stopping their apprenticeship to continue learning and complete a qualification. Qualifications in this category would enable apprentices intending to continue learning within their industry to take advantage of a more interdisciplinary and student-centred approach. Examples cited included digital and technology, where occupational progress is not always linear, and the sport industry, where careers can progress across roles within an occupation level.

Total number of responses to this question: 16

IfATE response: Any future use of this category will be supported by comprehensive criteria and guidance. These will clearly explain its purpose, structure, relationship to occupational standards and requirements for employer demand evidence.

Question 8: Do you agree that IfATE should define a category of qualifications for approval that deliver occupational entry competence against an occupation at levels 4, 5 and 6 where no occupational standard exists?

There was strong agreement (70 per cent) that IfATE should define a category of qualifications for occupational entry where no standard exists. 25 per cent disagreed and 5 per cent were not sure.



Total number of responses to this question: 20

Respondents agreed it was important that qualification approval is responsive, to meet employer requirements. This would allow flexibility for emerging occupations or areas where there is an occupation on IfATE's maps, but no standard developed.

Respondents in favour felt that lack of an occupational standard should not prevent development of qualifications. Instead, their development should be allowed, to meet industry needs, which may move ahead of currently available standards. This would enable a broader range of funded qualifications outside those used for apprenticeships. This would be useful when an apprenticeship is not appropriate. One respondent said this category would enable awarding bodies to develop qualifications for industries mainly made up of SMEs, sole-traders and freelance professionals. These would meet needs not covered by occupational standards.

There was some agreement that an occupational standard should be developed as early as possible after a qualification is approved in this category. Qualifications should then be amended to ensure they align. This link to a standard would provide consistency of outcomes.

There was some agreement that determining employer demand should not be based on evidence from one niche area, employer or employer group.

Employer views should be representative, to guard against narrow qualifications that do not serve broader employer and sector needs. Concerns were raised that absence of an occupational standard could lead to a 'short cut' to approval. This could lead to an employer driving development of qualifications to meet their own needs and not those of the wider sector.

Those who disagreed felt that occupational standards should be developed promptly to meet industry needs, questioning the need for this category. They also suggested this category might be complicated, with a burdensome approval process. IfATE agrees that qualifications should usually be approved against an existing occupational standard. The category was proposed for inclusion in the system to ensure responsiveness.

IfATE response: Responses to this question showed agreement on the need for this category to enable qualification approvals. This category may therefore be specified for use in a future approval framework.

The processes for developing occupational standards are kept under review. Programmes such as SkillsCompass intend to improve these by:

- Providing a framework for development of standards.
- Supporting prioritisation of occupational standards updates and development of new ones.
- Supporting planning for the introduction of new skills within products and curriculum.

Question 9: Are there any other elements IfATE should consider when specifying this category, to ensure it delivers its stated intention?

Responses to this question centred on how the relationship between these qualifications and occupational standards would work in practice. Respondents wondered whether standards development could be responsive enough to employer need.

One respondent felt the category's intent to enable the system to meet rapid short-term workforce change could risk students using their LLE on qualifications with limited medium- to long-term use.

Another asked whether there would be a time limit for creating an occupational standard and whether a rationale for the decision would be given.

There was some agreement that the current way of developing occupational standards is resource-intensive for employers. It is less good at reflecting micro-business and SME needs than those of larger employers with more resources. One respondent pointed to difficulties bringing employers together to create standards in areas where the workforce is mainly self-employed. To

note, the approach to developing occupational standards is kept under review. The SkillsCompass project aims to give broader evidence to support standards developments and updates.

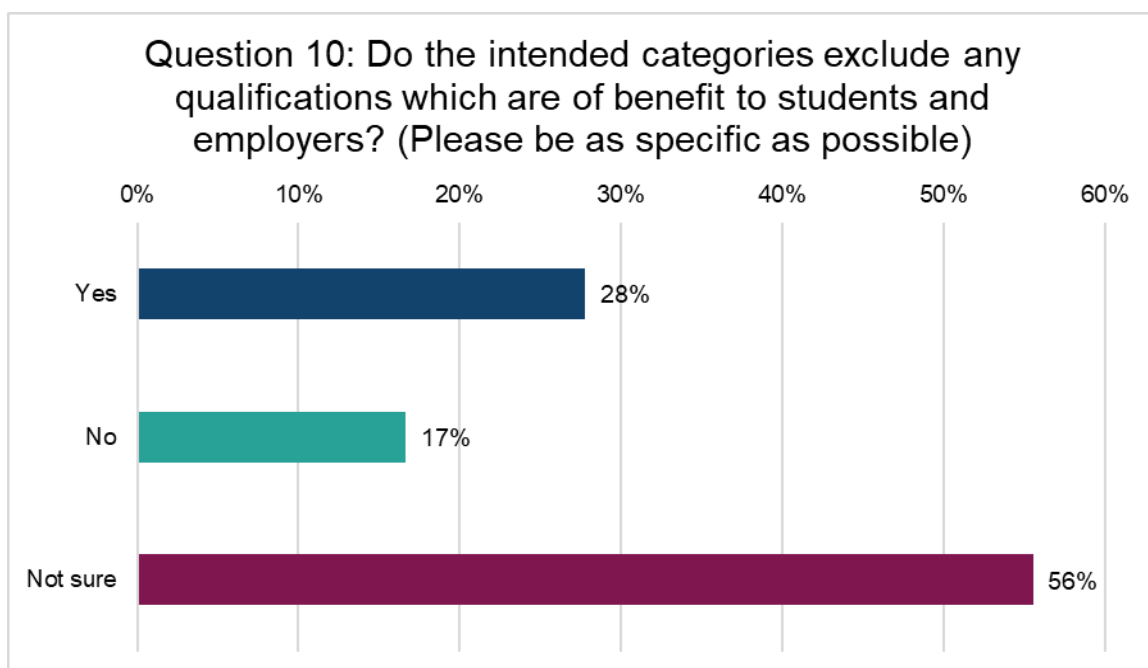
One respondent, whilst seeing the benefits of the category, pointed to more risk for learning providers and students in having qualifications without an occupational standard. They noted the importance of ensuring any qualifications approved in this category were deliverable, assessable and useful to students, without a standard to anchor them. Respondents also pointed to the need for IfATE to consider existing industry standards when deciding whether to approve qualifications. IfATE would need to ensure qualifications did not conflict with existing industry standards. IfATE is aware of this risk, engaging with PSRBs to ensure all approved qualifications meet their requirements.

Total number of responses to this question: 14

IfATE response: IfATE recognises respondents' concerns about qualifications approved without an occupational standard. IfATE's view is that the flexibility this category offers should only be needed in limited circumstances.

Question 10: Do the intended categories exclude any qualifications which are of benefit to students and employers?

56 per cent of respondents were not sure whether the intended categories would exclude any qualifications benefitting students and employers. 17 per cent said they would not exclude any beneficial qualifications. 28 per cent of respondents thought that some qualifications would be excluded.



Total number of responses to this question: 18

Responses varied considerably, with no firm agreement to report in any one

area.

Some respondents thought it desirable to fund level 7 qualifications with LLE. Areas cited included Psychologist, where people enter at post-graduate level 7. They saw benefit in ensuring professional qualifications at level 7 could be approved by IfATE and funded. To note, decisions on what is in scope to be funded through LLE are made by the Department for Education.

One respondent pointed to a potential risk of excluding qualifications suited to learners with Special Educational Needs and Disabilities (SEND). These learners tend to be more heavily impacted on by reforms. They asked whether the qualification range would be reviewed to ensure students weren't excluded from learning due to arbitrary criteria. To note, stakeholders have not yet identified any possible categories-based exclusions of this type of qualification. This will be kept under review throughout the introduction of any approvals process.

One respondent thought the reforms could have unintended consequences for short courses. Because modular qualifications must come from full qualifications aligned to an occupational standard, the proposed system could narrow the range of small standalone qualifications. The intent of the categories is to ensure that smaller technical courses can be approved if they have a defined purpose. Aesthetic beauty qualifications were given as an example of those that might be excluded because they don't fit with occupational standards levels. To note, IfATE believes this issue is addressed by the additional specialist category. It will, however, rely on a related occupational standard being available at the same level or one directly below the proposed qualification.

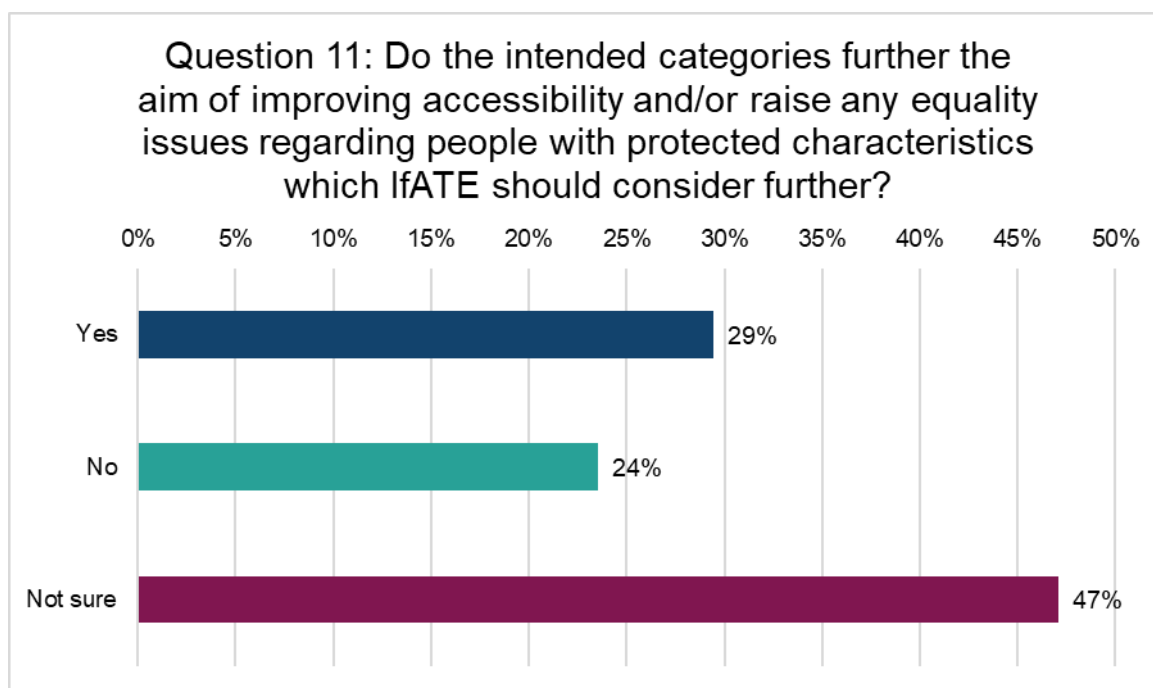
Another respondent thought NVQs might be excluded by the proposed categories. The respondent gave level 3 examples. It should be noted that NVQ qualifications can be submitted for approval at levels 2 to 6, mainly into categories targeting occupational entry competence.

IfATE response: Responses did not highlight any specific qualifications that IfATE believes could not be submitted within a described category. Any approvals activities would aim to support the inclusion of valued qualifications in the system, and this would be monitored in their administration.

Question 11: Do the intended categories further the aim of improving accessibility and/or raise any equality issues regarding people with protected characteristics which IfATE should consider further?

This question was designed to establish views on the likely impact of the proposed categories, both positive and negative. Responses to this question were mixed, with 29 per cent agreeing that the categories further the aim of

accessibility and/or raise equality issues which IfATE should consider further, 24 per cent disagreed and 47 per cent were not sure.



Total number of responses to this question: 17

Responses centred on the need for clear information to support student and employer choice. Good choices would protect students' investment.

Respondents commented that a modular qualification system will be complex, so high-quality CEIAG will be necessary. A more complex system could have more of an effect on disadvantaged groups, students with protected characteristics and SEND students. Prospective students, their trusted influencers (for example, parents or guardians) and employers must have clear qualification routes. It should be noted that the [Occupational Maps](#) will have information on all approved technical qualifications at levels 4 to 6. Data from the Maps is also available to other organisations to support their CEIAG.

The risk was again raised of leaving out qualifications which may be outside proposed categories, but which provide an accessible route to learning for SEND learners. One respondent queried whether qualification provision would be reviewed, to ensure this wasn't causing students to be excluded from learning.

Those who disagreed with this category gave no additional information on their reasons.

IfATE response: Responses did not highlight any specific qualifications that IfATE believes could not be submitted within a described category. Any approvals activities would aim to support the inclusion of valued qualifications in the system, and this would be monitored in their administration.

Modules

Question 12: How can IfATE, through its approvals process and sharing of skills insights, best enable the technical education system to respond to emerging skills needs?

Responses to this question pointed to a need for occupational standards to include emerging and future skills content. They asked for this to be added in a timely way.

Respondents commented on the value of IfATE sharing skills insights from approvals with employers, professional bodies and other representative bodies. This could include raising awareness of approved qualifications and how they link to emerging skills needs. IfATE could also provide data on numbers of people taking the qualifications and where they are located. This would ensure providers are aware of opportunities to meet skills needs in their locality. It is intended that Skills Compass delivers some of the improvements respondents asked for.

The point was made that there should be a focus on adding skills and knowledge which are not part of occupational entry qualifications. One respondent suggested 'micro-credentials' as a way to respond to emerging skills needs, with their lack of inclusion in approvals seen as a problem.

Similar to responses to the additional specialist category questions, respondents stressed the need for approvals to be agile. Approvals processes are continually reviewed with the aim to balance speed with rigour.

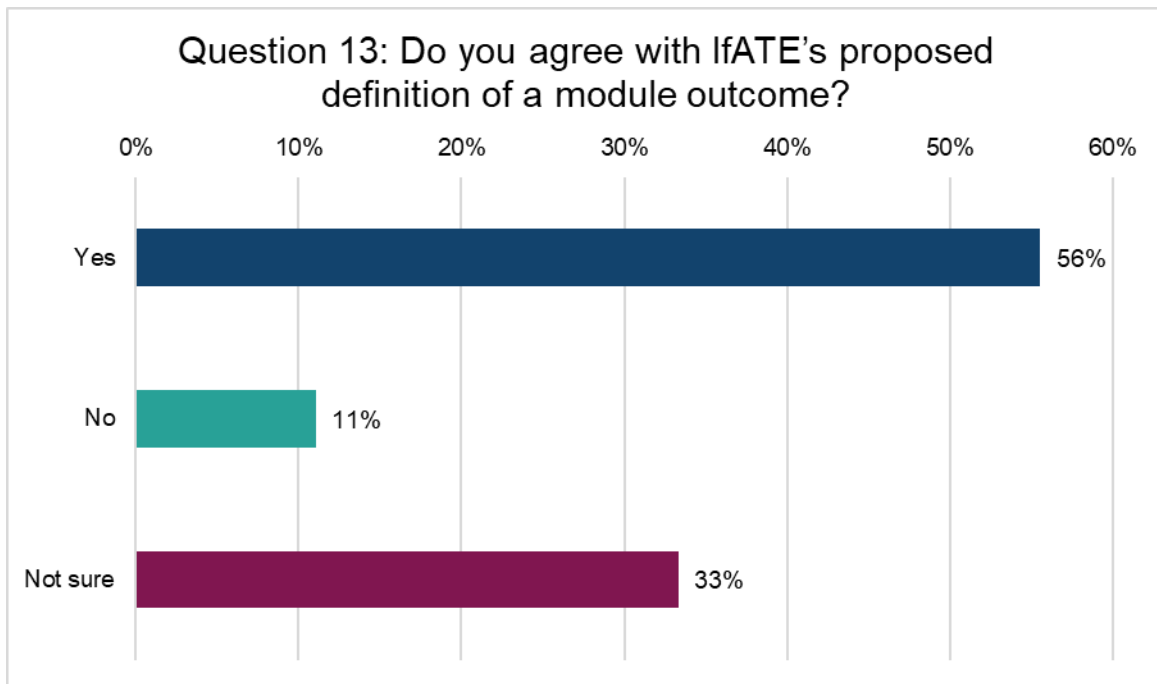
Total number of responses to this question: 17

IfATE response: IfATE will continue exploring ways for government to inform stakeholders about new and emerging skills needs. This includes its SkillsCompass work. This work aims to capture, analyse and present a range of data sources, including LMI and fore sighting data, to identify changing labour market demand.

Reflecting emerging skills in qualifications will continue to be important within the system, with processes aiming to support this.

Question 13: Do you agree with IfATE's proposed definition of a module outcome?

There was broad support for having defined module outcomes and some agreement on IfATE's proposed definition, with over half (56 per cent) of respondents indicating support. However, a large minority (33 per cent) were unsure about the suggested definition, reflecting a nuanced set of views needing further exploration.



Total number of responses to this question: 18

There was considerable agreement on the need to balance structure with flexibility. One respondent commented that module outcomes should be flexible, and broad enough to fit the diverse range of modules on offer. Another suggested it would be prudent to align with Office for Students (OfS) and Ofqual expectations here. One respondent stated that an agreed definition of module outcomes spanning Further and Higher Education would be a “game changer”.

There was support for basing module outcomes on KSBs, rather than or as well as duties. One respondent said the definition of a module outcome should be based on the KSBs it enables someone to develop.

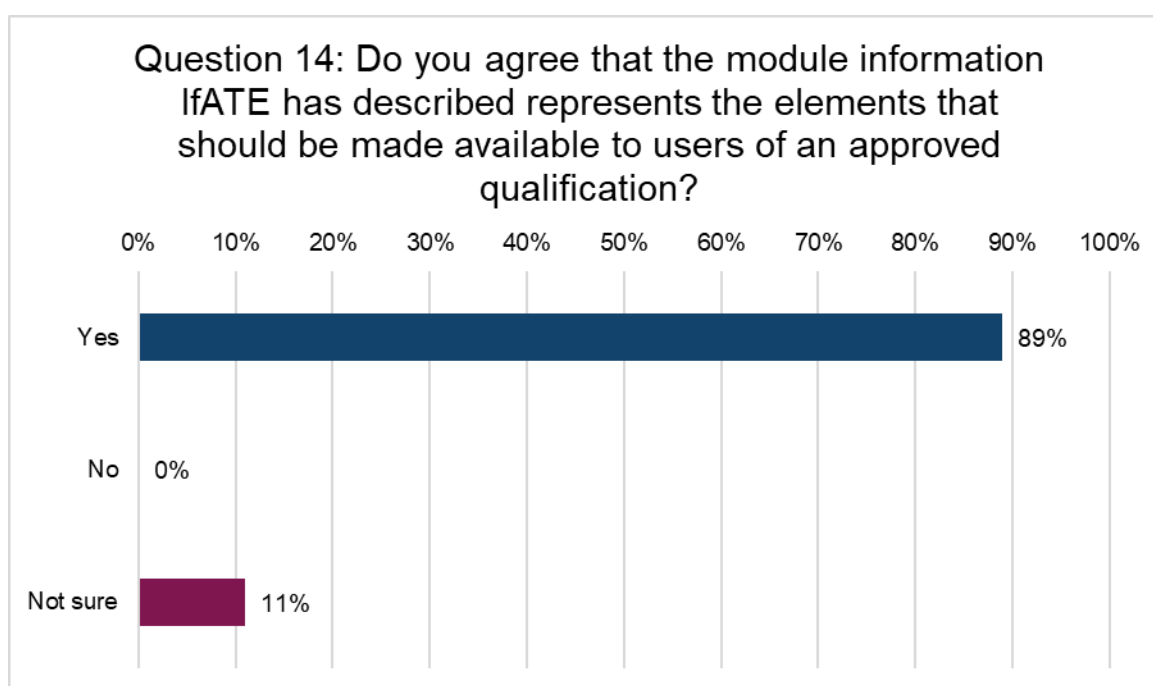
There was considerable agreement that linking module outcomes to duties may be restrictive. Competence-type, duty-based module descriptors could encourage mechanistic learning and assessment approaches. Module content will go beyond duties. This breadth of learning should be recognised and supported. One respondent said emphasis on duties would limit transferability between the Framework for Higher Education Qualifications of Degree-Awarding Bodies in England, Wales and Northern Ireland (FHEQ) and Regulated Qualification Framework (RQF). A related point was made that duties is a term not commonly used by awarding bodies and higher education institutions (HEIs).

IfATE acknowledges that, whilst a need for definition was agreed on, consensus was not reached on the substance.

IfATE response: Due to the nuanced nature of the responses and the clear steer to balance structure and flexibility, further work will be needed to build consensus in this area. Work will be undertaken with DfE, OfS and Ofqual, as well as other appropriate stakeholders, before specifying any expectations in this area.

Question 14: Do you agree that the module information IfATE has described represents the elements that should be made available to users of an approved qualification?

There was strong agreement (89 per cent) that the information set out by IfATE contained the things that should be made available to users of approved qualifications. 11 per cent of respondents were unsure. None disagreed.



Total number of responses to this question: 18

Agreement centred on the importance of clearly describing both the value of a single module and its place in the full qualification, and wider context of the student's learning journey. This includes: how modules can be combined to achieve desired outcomes for the student and employer; the entry requirements for each module; and further study made possible by completing the module.

There was some agreement on the need for flexibility. One respondent commented that information should vary depending on the qualification category, with IfATE considering what may be valuable for each category. Another highlighted the importance of this being guidance rather than a mandatory requirement. Design features should not be imposed where the need is already being met in existing awarding body processes.

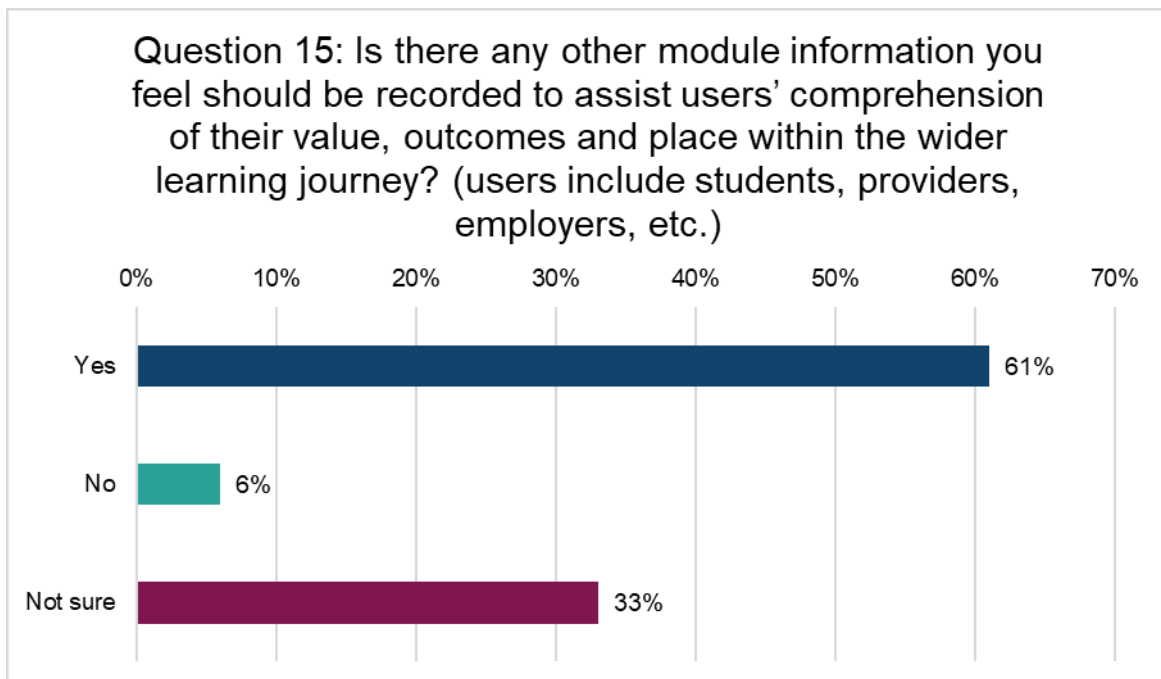
There was some agreement that clearly explaining a module’s place in its wider context might be difficult. The potential for modules to be unique to one organisation could make it difficult to show how modules from different organisations relate. This may impact on the ability to stack modules towards a full qualification. It was felt that aligning to occupational standards might support comparability through a common framework.

IfATE response: As noted above, the introduction of a modular landscape brings both opportunities and complexity. Some of the elements raised above are not in IfATE’s direct remit. Therefore, IfATE will work with relevant government organisations and system stakeholders to share learning from this consultation, to maximise its impact.

IfATE will continue to promote the [occupational maps](#) and the standards contained within them as a common framework on which to develop qualifications and explain the technical education system.

Question 15: Is there any other module information you feel should be recorded to assist users’ comprehension of their value, outcomes and place within the wider learning journey? (users include students, providers, employers, etc.)

There was considerable agreement amongst respondents (61 per cent) that further module information should be recorded to assist users. 33 per cent were unsure. These data reflect the question’s intention to explore and build consensus on the desired level of prescription for module information.



Total number of responses to this question: 18

A common theme in responses to this question was establishing a module's place in the landscape: its purpose, and how it links to workforce roles, occupational standards and other modules.

Information should be given on how modules relate to KSBs in occupational standards and the specific duties they support. This would enable students and employers to select modules that help them upskill and reskill.

Users should be made aware of complementary modules, for example, where knowledge is common to more than one module. They should also be made aware that one module alone may not be enough to gain competence. This may rely on the knowledge and skills covered by complementary modules.

Clear information should be given on differences in module design and outcomes between different qualification types and awarding bodies. Users must be supported to understand how modules can be combined to gain a full qualification and what the restrictions are. Any time limits on module achievement and what happens when a qualification changes over time should be made clear.

IfATE recognises the need for connections between modules to be explained and to identify other elements which might contribute to competence in the workplace. Those delivering approved technical qualifications should consider this in their promotion and materials.

Respondents agreed that clear information on learning journeys was important, along with examples to illustrate them. One respondent suggested providers should be encouraged to give information about whether their modules meet FHEQ learning outcomes, to enable credit transfer to other qualifications. Another said that clear information should be provided on how modules align to industry standards and professional body requirements. This should include information on additional modules needed to meet requirements for professional recognition or accreditation. A further response said it was important to note broader transferable skills developed by a module which benefit both students and employers.

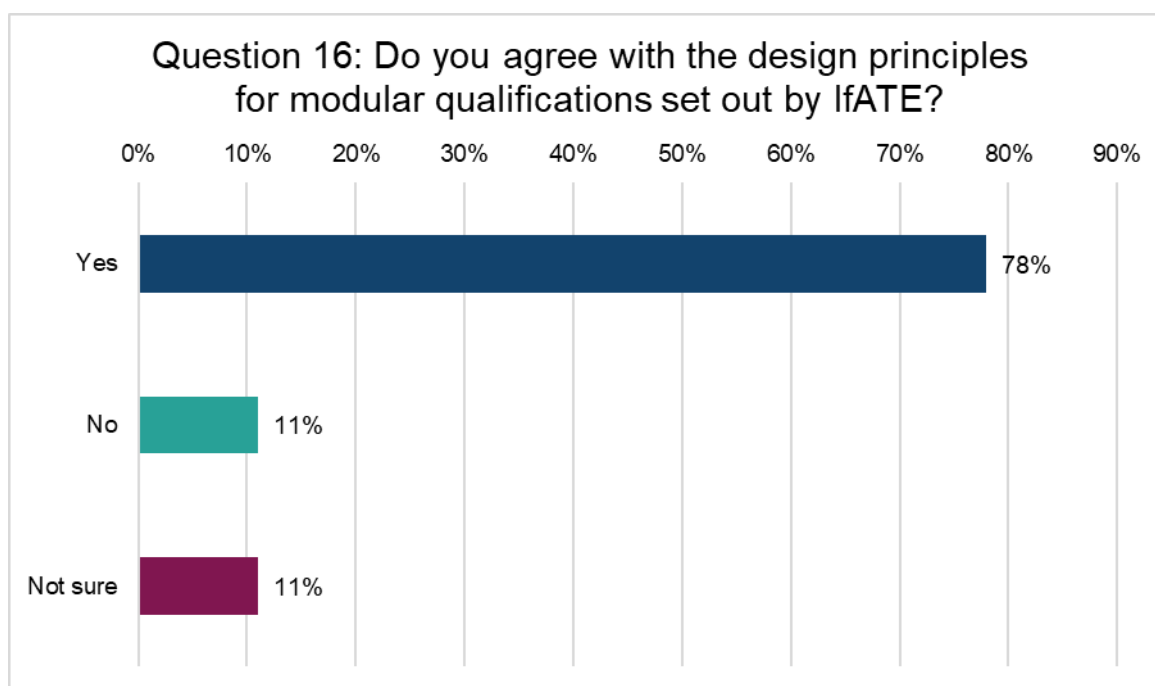
The theme of good CEIAG again came through strongly in responses to this question. Module information should include signposting to relevant support to help users make effective, informed decisions.

IfATE recognises the importance of the points raised in response to this question. It will ensure insights are shared with relevant stakeholders to support the development of an effective modular system.

IfATE response: Learning from this question will support activities noted for Question 14.

Question 16: Do you agree with the design principles for modular qualifications set out by IfATE?

There was strong agreement (78 per cent) on the principles for modular design set out by IfATE. 11 per cent of respondents disagreed. 11 per cent were not sure.



Total number of responses to this question: 18

Respondents felt the principles were clear and based on good practice. There was agreement that it was sensible and logical to provide some structure within a flexible system. This flexibility would enable innovative qualification design to meet student and employer needs.

There was some agreement that regulation should be holistic and not overly burdensome or complex. Regulators should work together on a complementary system that doesn't duplicate or create conflict.

One respondent thought that putting qualification units together to form modules matches higher education practice, increasing parity between the two frameworks (FHEQ and the RQF). Another, although partially agreeing with the principles, thought they may limit awarding bodies' design and certification of qualifications. They felt adding units together to form modules may be more feasible than grouping learning outcomes.

One respondent questioned how the holistic assessment requirement would work when bundling units to make modules. To note, where units are put together to form a module, the module can be assessed at either unit or module level. IfATE's preference for holistic assessment still applies, whether assessment is done at unit or module level.

Responses stated the need for real examples that apply the modular design principles, to aid understanding of what makes a good approval submission.

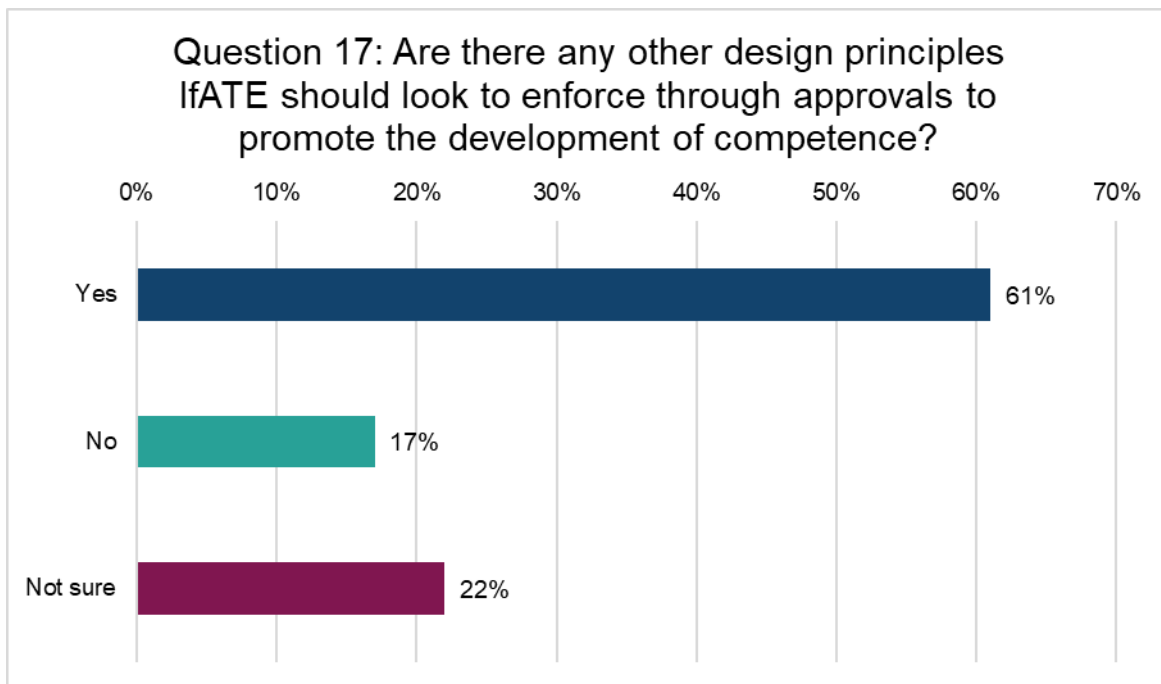
To note, any criteria will intend to make clear any specific design requirements. IfATE hopes less prescriptive requirements will enable awarding bodies to explore innovative modular design.

One respondent raised the broader question of how modularity sat alongside the concept of occupational competence. IfATE thinks it important to be clear what achievement of modules means in terms of a student's development and how this links to the wider learning journey. This is a broader communication point to be considered alongside other views on system accessibility.

IfATE response: The proposed modular design principles will be refined in response to feedback and are likely to feature within a future approval system. Government organisations will work together to ensure the approval and regulatory system for modular qualifications is coherent and proportionate.

Question 17: Are there any other design principles IfATE should look to enforce through approvals to promote the development of competence?

There was considerable agreement (61 per cent) that IfATE should enforce other modular design principles. 17 per cent of respondents thought the principles set out were enough. 22 per cent was not sure.



Total number of responses to this question: 18

Respondents confirmed their agreement with the proposed approach of limited prescription. This would minimise the burden of the approvals process and give providers flexibility to innovate.

Beyond this, responses to the question covered several themes related to competence. One respondent said that skills are gained through repetition over time. Students can only achieve competence if they have the opportunity

for regular, repeated practice. In a short course of study, establishing full occupational competence is rarely possible, but respondents agreed that entry level or basic competence can be achieved.

There was some agreement that assessment strategies were important here and it is right to include them in any approval process. This ensures consistency across qualifications and awarding bodies. One respondent said that flexible and accessible assessment methods, including use of technology, would be important to support a modular system. Another said "workplace" assessment should be the preferred method for assessing practical elements.

Whilst IfATE agrees with most of the points raised, the lack of consensus means that it is unlikely any additional requirements will be set. Applicants should use the most appropriate assessment approach for the outcomes in their qualification.

IfATE response: As there was no consensus on this question, IfATE have no plans to develop additional criteria.

Accessibility

Question 18: What elements could be included in IfATE's approvals process to strengthen requirements relating to accessibility and equity, diversity and inclusion (EDI) in qualification materials and assessment?

Responses centred on ensuring the approval process gives due regard to accessibility and Equity, Diversity and Inclusion (EDI). There was considerable agreement that submissions should contain information on the qualification's EDI and accessibility impact.

Responses directly addressing IfATE approvals agreed on the importance of a clear and transparent EDI and accessibility process. Awarding bodies should be asked to comment on how their programme is accessible to people from a range of socio-economic backgrounds and those with protected characteristics under the Equality Act 2010. This could include qualifications specifically designed for learners with SEND. One respondent suggested an EDI impact statement be provided as part of the submission, setting out the awarding body's approach to EDI and accessibility. This should include how assessments may be adapted in line with Reasonable Adjustments. To note, IfATE does collect this through approval submissions, including detailed information on the assessment of the qualification. Continued collection via approval will ensure awarding bodies consider EDI and accessibility when developing technical qualifications.

One awarding body stated that EDI and accessibility are fundamental elements of its qualification design, development and assessment processes. This is also a key regulatory requirement of Ofqual. Having clear guidance or criteria will help ensure any additional expectations are set out, aiding standardisation and transparency. The respondent also stated the importance

of an approvals system for EDI and accessibility being consistent and proportionate.

There was considerable agreement on the importance of good, accessible information, advice and guidance on the approvals process, explained in simple language. One respondent said there should be scope for facilitating the sharing of good practice here.

There was some agreement that EDI and accessibility subject matter experts should be involved in developing occupational standards and qualifications. One respondent suggested a specialist panel to check alignment to EDI requirements during standards development. Another suggested that IfATE's approval process should involve such experts. Whilst IfATE does not employ accessibility and EDI experts, it does currently consider accessibility and EDI when developing occupational standards. Trailblazer groups use IfATE's [EDI toolkit](#) when they develop occupational standards. IfATE also encourages awarding bodies to use this toolkit, alongside their existing processes for meeting EDI regulatory requirements.

Total number of responses to this question: 13

IfATE response: Future approvals systems will continue to ensure EDI issues are considered in qualification development.

The [EDI toolkit](#) is currently used in the development of occupational standards to ensure adherence to good EDI practice. Promotion and use of the toolkit is likely to continue.

Assessment strategies are likely to continue to form part of approvals submissions. These strategies are required to include information on approaches to accessibility of assessments, including reasonable adjustments.

IfATE has not yet been requested to approve qualifications specifically designed for SEND users. Where interest is expressed in such a submission, this will be considered on its merits within future approvals.

Question 19: How do you currently assess accessibility and monitor EDI outcomes within your own training or qualification design and delivery?

Responses showed a range of approaches to assessing accessibility and monitoring EDI outcomes, with different areas of focus depending on the type of organisation responding.

The approaches most commonly described by respondents were to: conduct a prospective EDI/accessibility impact assessment or monitoring exercise; use expert and other insights in the design process; monitor outcomes using a range of methods; and evaluate findings to inform improvements. A common

theme was use of EDI and accessibility experts throughout qualification and curriculum design processes. Prospective approaches included:

- EDI surveys
- use of an Inclusive Curriculum Tool and Accessibility Checklist
- special/expert groups inputting to programs
- monitoring uptake, with subsequent analysis of retention and achievement

Respondents agreed that design should take account of EDI and accessibility. One respondent said inclusive learning is a key part of its course design. Its Course Refinement and Approval Panels validate this. Outcomes are then considered through course monitoring. All courses/course groups have monitoring action plans so they can continuously improve.

Another stated that it quality assures how effectively inclusion and accessibility have been included in design. The same organisation suggested it would be helpful to explore ways for providers to share good practice in inclusive and accessible design of technical education. To note, IfATE does offer advice on this via its published [EDI toolkit](#). Where additional good practice is found during introduction of a modular system, government will seek to promote this.

There was some agreement on the importance of working with centres providing qualifications. One respondent said it works with local and national centres to ensure they can offer employers the best resources to meet current and future workforce needs. Another conducts regular quality assurance visits to delivery centres to check policies and procedures are in place, and actively implemented to support EDI and accessibility. IfATE's thinks it important that awarding bodies work directly with centres to understand and, where appropriate, support issues relating to resources and accessibility.

One respondent suggested student feedback play a role in the approval process. IfATE should consider involving students in approvals, to support assessment of accessibility and EDI and help identify barriers to success. Another respondent pointed to the importance of valuing qualitative approaches to monitoring EDI outcomes alongside more data-driven models. IfATE recognises the need to balance qualitative and quantitative measurements. The oversight system will use both qualitative and quantitative information when assessing qualification performance.

Total number of responses to this question: 11

IfATE response: These suggestions will be considered when devising and delivering any future approvals process.

Question 20: What are the most important elements IfATE should prioritise in the development of an accessible levels 4 to 6 qualification system?

Responses to this question centred on building a system that was flexible and avoided undue rigidity. Good quality, consistent and comprehensive CEIAG was seen as essential to support this, helping users navigate the system. The need to ensure a simple, effective approval system was also noted as key to ensuring the system operates well.

One respondent said many of those engaging in the skills system will be adults who will not have access to the same amount of advice as younger students. Another said knowledge of higher and degree apprenticeships, KSBs, occupational standards and occupational maps is poor in leavers of statutory education. Suggestions to improve this included IfATE working with careers organisations, e.g., Careers Enterprise Council (CEC), to ensure careers specialists are equipped to give advice on technical education.

Some responses commented on IfATE's engagement with stakeholders. Continued employer engagement throughout the design, development and approvals process was seen as important. There was some agreement that IfATE should more actively market the proposed system, raising awareness with employers and students. This was seen as important in ensuring the modular system and LLE are used effectively. IfATE recognises that more work is required to raise awareness of the technical education system with all users.

There was some agreement that the qualifications system should move away from roles only aligned closely to occupations as these were seen as too rigid. One respondent thought that horizontal and individualised career progression should be supported and promoted above traditional definitions of occupational competence. Some current occupational standards were felt not to support inclusivity. To note, IfATE believes aligning technical qualifications to employer specified occupational standards promotes a clear and consistent system for users. The [EDI toolkit](#) is used by trailblazer groups, ensuring EDI is considered when developing standards.

There was some agreement that occupational standards were important in promoting an accessible system. One respondent said that there should be timescales and key milestones for the redevelopment of occupational standards, including a clear process for implementation of review outcomes. This would help qualification users understand the process better and plan more effectively. Currently, IfATE seeks to ensure changes are communicated via its website, including through the [revisions and adjustments report](#).

There was some reference to providers in responses to this question. One respondent highlighted the importance of the system being delivered through local provider networks. One respondent suggested that providers input to creation and approval of new qualifications, to ensure they are accessible to

students. To note, IfATE expects most interactions on design and delivery of qualifications to be directly between awarding bodies and providers.

One respondent noted that the Department for Work and Pensions (DWP) is encouraging employers and education providers to use the [Adjustments Planner](#). They suggested it would be beneficial for IfATE to explore how rollout can be supported. The planner provides a framework for apprentices with disabilities to discuss their support needs with both their employer and education provider.

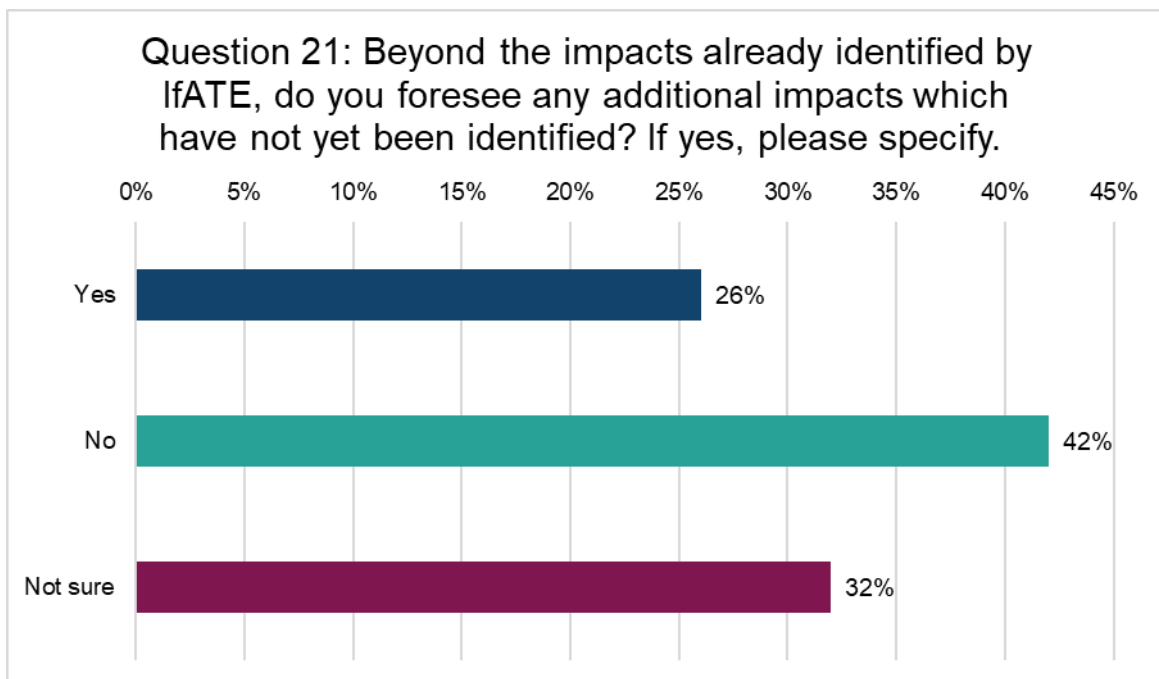
Total number of responses to this question: 11

IfATE response: These suggestions will be considered when devising and delivering any future approvals process. This includes how the outputs of the process are promoted and also any interactions with other stakeholders to ensure the provision of good CEIAG.

Impact assessments

Question 21: Beyond the impacts already identified by IfATE, do you foresee any additional impacts which have not yet been identified? If yes, please specify.

26 per cent of respondents thought there would be additional equality impacts. Most either did not have any additions to highlight (42 per cent) or were unsure whether there would be any further impacts (32 per cent).



Total number of responses to this question: 19

Respondents pointing out potential additional impacts each suggested something different.

One suggested socio-economic issues should be more explicitly considered. This should include an impact assessment of the proposals on a range of people, to inform how those affected by socio-economic issues can be supported and encouraged to study.

Another respondent suggested route panels' profiles should be addressed, where some industries were either over- or under-represented. IfATE has policies for making route panels representative. Employers can apply to be on a relevant panel via the [route panel recruitment process](#).

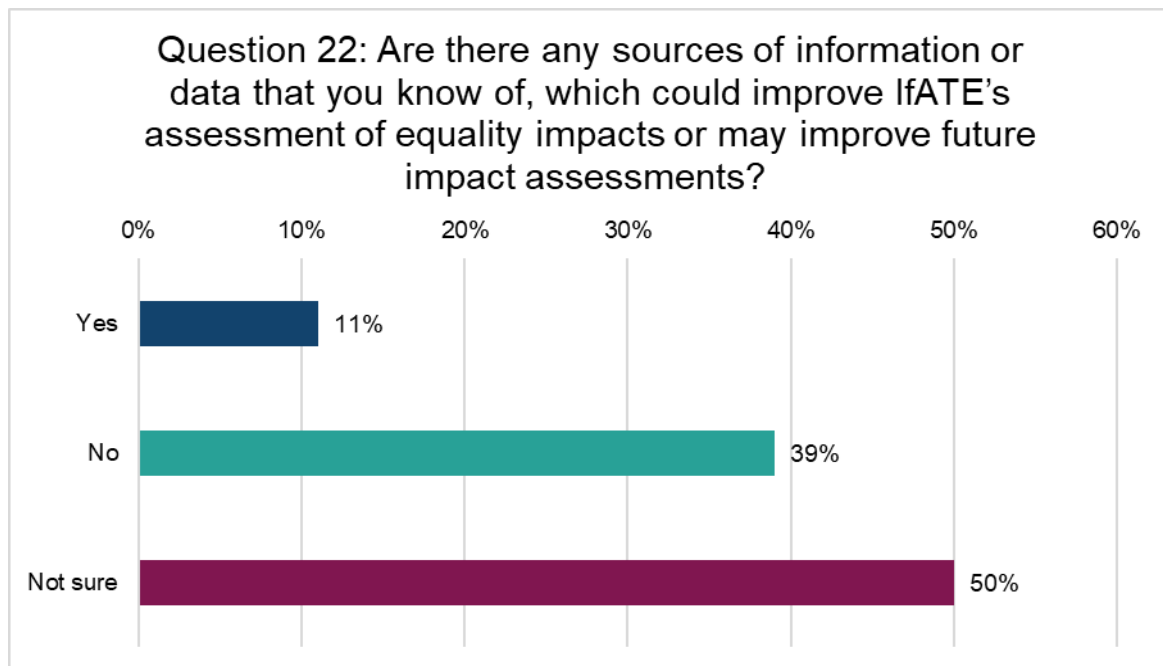
A respondent said the student experience in relation to modular learning was important, specifically how to ensure students feel they belong and are part of a learning community. This can be more challenging in modular delivery and is likely to impact most on SEND students and those with protected characteristics. A further response voiced concern over the potential impact on numbers of people with special educational needs taking up learning.

IfATE response: The impacts suggested by respondents will be considered in ongoing policy and implementation work.

IfATE has updated its own impact assessments accordingly (pp. 44-52).

Question 22: Are there any sources of information or data that you know of, which could improve IfATE's assessment of equality impacts or may improve future impact assessments?

Most respondents to this question either did not have anything to suggest (39 per cent) or were unsure whether there was anything they would suggest (50 per cent). Only 11 per cent of respondents thought further sources of information could improve IfATE's equality impact assessments. This reflects the open nature of the question, to gain insights not covered in previous questions.



Total number of responses to this question: 18

One respondent suggested that dyslexia and autism impact should be considered specifically. Another suggested workforce development plans for priority areas and regional skills needs analysis should be looked at.

Another suggested the evaluation of the [OfS Short Course Trial](#) would be useful. It could aid understanding of factors affecting uptake of the LLE and inform impact analysis of its accessibility. Employers surveyed for the evaluation report expressed appetite for shorter stackable courses of around 10 credits, as opposed to 30 credits.

Suggestions for specific sources of information for equality impacts included:

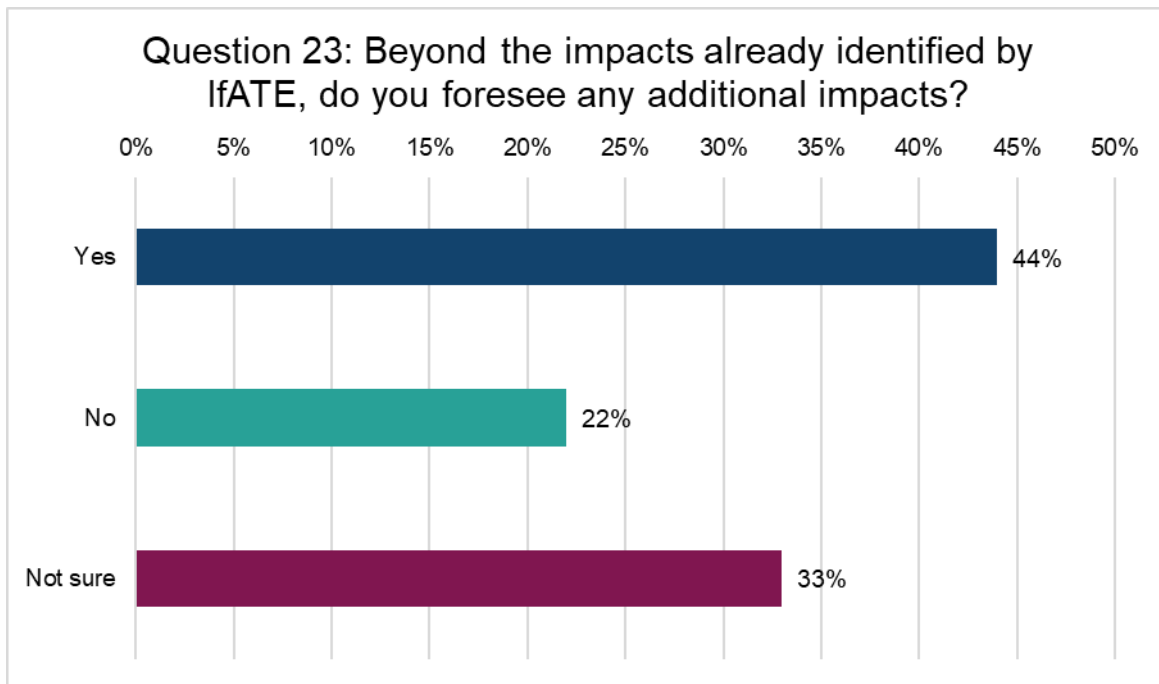
- Social Mobility Foundation
- Apprenticeship Decent Wage Pledge
- Apprenticeship Diversity Champions Network
- End Child Poverty
- Real Living Wage Commission
- Care Leavers Association
- Unlock

IfATE has reviewed the suggested information sources. Because this consultation is about the approval of technical qualifications, the review did not suggest a need to amend the existing equality impact assessment. IfATE will ensure these sources are considered in future work.

IfATE response: The suggested sources of information will be considered when conducting future equality impact assessments.

Question 23: Beyond the impacts already identified by IfATE, do you foresee any additional impacts?

There was some agreement amongst respondents (44 per cent) that further impacts not identified by IfATE in its general impact assessment were possible. 22 per cent of respondents did not think there would be additional impacts and 33 percent were not sure.



Total number of responses to this question: 18

Some respondents noted the need for system stability to improve educational outcomes. Change was seen as particularly unhelpful at a time when stakeholders are struggling due to “years of under-resourcing”. Responses on this theme seemingly applied to all stakeholder groups that have been impacted on.

Some respondents said the approval process needed to be clear. The introduction of additional, more flexible categories might make it harder for awarding bodies to find the appropriate approval route. One response suggested flexibility, allowing awarding bodies to change category and adapt applications during the process. This may be necessary until the system is fully established.

Another respondent said the process at level 2 and 3 was too bureaucratic and burdensome, causing limited availability of qualifications. They felt that creating a similar system for levels 4 to 6 would have the same effect.

One respondent voiced concern that employers could use the LLE to reduce their own training spend. They asked the question ‘where people are in work and seeking to undertake study that would support their progression, could this funding model lead to a situation where employers ask their staff to self-fund qualifications to support upskilling through the LLE?’ They suggested widening the apprenticeship levy to include funding of modules as a way to avoid this. It should be noted that any decisions on how qualifications are funded sit with the Department for Education.

Respondents pointed to a range of potential impacts for qualification development. Some were on the set-up stage (process, system and training), with others on recurring activities (development and awarding). Respondents

also noted that more time would probably be needed to create qualifications delivered and awarded in a modular way. Stakeholder engagement in the process would potentially be more burdensome.

One respondent noted a potential wider, cross-sector impact on areas such as CEIAG services and providers. Understanding of these reforms would need to be built into the technical education landscape. IfATE recognises a modular system will need to be clearly explained and the importance of this to a strong technical education system. Responsible government organisations will collaborate and involve relevant system stakeholders to support this work.

IfATE response: The impacts suggested by respondents will be considered in ongoing policy and implementation work.

IfATE has updated its own impact assessments accordingly (pp. 44-52).

Question 24: What is the likely impact of an increase in modular qualifications on the business models of employers, awarding bodies and providers?

The purpose of this question was to gain insights on the wider impacts of a modular system on organisational practices. The question stimulated a range of responses.

Some said again that modularity will give employers and their employees more flexibility. They felt employers would have easier access to funded learning to develop their workforce and support achievement of organisational goals. Some concern was again raised about increased burden on students taking out loans to support workforce development.

One respondent noted significant potential impact on the operations of universities offering modular learning, related to staffing, systems and processes, and general management and oversight. Another said clarity is needed to plan for introducing modules. It isn't currently clear how or if these students will be recorded separately within data returns such as HESA and how they will be managed within registration conditions. These aspects are important for institutions to manage risks and understand the opportunities open to them. Systems are also being constantly developed and, without clear information, any changes in data architecture could cause problems. Another respondent highlighted a significant potential impact on HEIs because their student record systems are currently designed for course-based structures rather than individual modules. HEIs would need to invest significantly to alter how student records and course development operate. One respondent said credit portability and transfer needed more thought. They felt this would be too complex to develop prior to sufficient numbers of students taking up modular courses.

There was some agreement that increased resource and funding would be needed to design and develop high-quality modular qualifications. Many small

and specialist providers would face significant entry barriers because they lack necessary financial or human resources.

There was some agreement that providers being ready to deliver modular qualifications would be key to their success. Modular delivery will require multiple courses for each subject area, based on intake periods in a year. Another respondent stated that many of its members already offer courses which could, in the proposed system, achieve recognition and funding through the application of credit by an awarding body. This would open them up to a more diverse range of students, widening access to higher and professional technical education through availability of loan funding. In the current system, these courses can only be accessed by students who have finance in place.

There was some agreement that a modular system could cause a change in how students access learning. One respondent pointed to a possible fall in uptake of full qualifications in favour of modular learning. Another thought that, although many students build modules towards a full qualification, not all learners will have the same motivations. Some will not be aiming to achieve full qualifications. Instead, these students would benefit from taking smaller courses developed in response to employer demand. One respondent thought that providers may reduce apprenticeships to enable them to offer modular courses, as more people can access these without needing to be employed.

One respondent felt that the proposed system shows a recognition that a purely occupational model is not suitable for all purposes. This indicates a move towards a skills system that delivers on diverse employer needs. Another said that flexible provision is a pillar of its own place-based and policy-informed approach, collaborating with local businesses to create upskilling opportunities in local communities.

CEIAG was again raised as a key success factor for a modular system. Students should have access to advice on how modules build towards a full qualification so they can make informed choices and not be confused.

On the subject of standardised transcripts, clarity in roles and responsibilities of providers and awarding bodies in providing transcripts would also be necessary. Successful modularised learning will rely on shared understandings and collaborative working between providers and awarding bodies. On the issue of clarity of module purpose, a professional body respondent said it would need to consider how modular qualifications featured in its admissions processes.

Total number of responses to this question: 15

IfATE response: The rich insights gained in response to this question will inform policy development. They will also inform planning for the introduction of a modular technical qualification system at levels 4 to 6.

Engagement events

Communication approach and statistics

Between 16 January and 08 April 2024, IfATE used a range of communication platforms to ensure a broad response to the consultation. This included: targeted communications via social media (LinkedIn and X (Twitter)); creating a dedicated website area; holding stakeholder webinars; sending direct stakeholder emails; speaking at conferences; and writing news articles.

Through targeted engagement, the consultation section of the IfATE website gained over 4800 page views. IfATE also received over 7200 impressions across LinkedIn and X (Twitter), over 94 reactions or likes, 56 shares, and 144 click throughs.

Engagement events

During the consultation period IfATE held eight broad engagement activities covering the following stakeholder groups:

- Federation of Awarding Bodies (FAB): awarding body members
- Association of Colleges (AoC): member FE colleges engaged in HE provision
- Association of Employment and Learning providers (AELP): employment and learning provider network
- Edge Foundation: skills shortage group
- Quality alliance (QA): strategic leads in key organisations
- Energy & Utilities Advisory Panel (EUAP): industry stakeholders
- General IfATE stakeholders: generalised audience of stakeholders engaged in IfATE's work
- Route Panels: IfATE's 15 employer panels

Stakeholder feedback

Feedback at events mirrored the findings from the consultation proper. Key areas of focus for stakeholders included the need:

- to balance rigour and manageability within approvals
- to ensure employer spend on training was not diluted
- for clear careers education, information, advice and guidance to support the use of the system

Stakeholders generally regarded the development of a modular system at levels 4 to 6 to be of benefit to students, with feedback focused on how best

to implement the proposed changes.

Next steps

Feedback from the events has been logged and considered alongside the findings from this consultation. Feedback from events is not logged within the formal consultation response but will be factored into policy development work in this space.

Equality impact assessment (updated).

The Public Sector Equality Duty

Under Section 149(1) of the Equality Act 2010, the Institute for Apprenticeships and Technical Education has a duty to have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it

The relevant 'protected characteristics' for the purpose of each element of the Public Sector Equality Duty (PSED) are:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race (including ethnicity)
- religion or belief
- sex
- sexual orientation

IfATE also needs to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first aim of the duty outlined at a) above applies to this characteristic but that the other aims outlined at b) and c) (advancing equality and fostering good relations) do not apply.

Limitations on assessing impact for certain protected characteristics.

Information on sexual orientation, religion and beliefs, pregnancy and gender re-assignment are not collected as part of the Individualised Learner Record (ILR) required to be submitted to DfE by education and training providers. This means IfATE does not have access to up-to-date data on these characteristics. Therefore, IfATE cannot fully assess whether the proposed approach to approval is likely to have differing impacts on people with different characteristics in these areas.

IfATE is looking, as part of its work on equity, diversity and inclusion (EDI) at how it might better understand the EDI-related impact of technical qualifications on students. This includes what data awarding bodies might collect on any protected characteristics of students enrolled on their

qualifications. To support this, IfATE posed a specific question to awarding bodies within its [level 3 and below consultation](#).

Impacted Groups

The DfE completed an equality impact assessment as part of its consultation in relation to the [lifelong learning entitlement](#). This assessment primarily pointed to the positive impact that the introduction of flexible, modular learning might have on groups previously unable to access learning. This included neutral or beneficial impacts of the measures on individuals across the breadth of protected groups.

As its role primarily relates to qualification approvals, not funding or direct delivery to students, it is not possible for IfATE accurately to quantify potential impact at this point, as the availability of qualifications will be impacted on by:

- provider choice/offer
- student preferences for study (for example, whether to study technical or academic qualifications, or, where possible, a mix of both)
- awarding body choice around which qualifications to submit for approval
- employers' expressed demand for qualifications at the point of submission
- awarding body success in their qualification being approved by IfATE and then by DfE for funding

As recorded within its general impact assessment, the categories specified by IfATE have the potential to exclude qualifications which would otherwise have been submitted for funding. IfATE has designed the categories to avoid this eventuality. To make sure that IfATE does not omit provision from the landscape unduly, this consultation sought views on whether any qualifications which are currently valued in the market would be excluded because of the described categories. Where categories are used, this will be monitored to ensure it does not unintentionally exclude anything from the landscape which may be of value to any protected groups.

In addition, the design of IfATE's approval process ensures that its approval criteria will be applied fairly to all technical qualifications submitted to it for review, regardless of the category being approved. IfATE's criteria have been written so as not to create any specific bias and to avoid negative equality impact. As such, IfATE has not identified any potential impacts on students with protected characteristics from its proposals relating to qualification and assessment design. Under their obligations in the 2010 Equality Act and relevant regulations, awarding bodies must consider the accessibility of their qualifications to students, including those with particular protected

characteristics. As such, awarding bodies will need to be mindful of the impact of their assessment methodology choices on students.

As part of its efforts effectively to discharge the public sector equality duty, and in some respects to build upon it, IfATE asks, within all its approval activities, for awarding bodies to explain how equity, diversity and inclusion (EDI) considerations impacted their design and delivery decisions. Through this activity, IfATE is placing EDI as a focus within its submission process, requiring that awarding bodies explain their approach to meeting their responsibilities to students with protected characteristics. This is currently a requirement linked to IfATE's [equity, diversity and inclusion strategy](#).

Overall, the current approach to approval ensures that IfATE-approved qualifications are fit for purpose and of high quality for delivery to students, including those with protected characteristics. This best practice will inform future approvals in this space.

Additions to equality impact assessment:

Most feedback received on this topic focused on ensuring students were not disadvantaged at the point of qualification delivery. Whilst the delivery of curriculum is outside of the remit of IfATE's approval work, it will consider how best to ensure that issues reported via this consultation are shared with stakeholders in the sector. This is with the aim of enabling all students to benefit from the flexibilities offered within a modular system.

A limited amount of feedback pointed to the likelihood of useful qualifications being excluded from the system, especially those designed for SEND students. To date, IfATE has not been advised that approval requirements restrict the submissions of such qualifications; and IfATE does not view its proposed approach as specifically blocking the submission of such qualifications. The approach to approvals will, however, be reviewed if such a situation were to arise.

Generally, responses indicated the categories proposed were likely to allow the approval of a suitable range of technical qualifications. Government will work to ensure that the range of technical qualifications made available meets the needs of all users of the system.

General impact assessment (updated)

Employers

Whilst a primary function of IfATE is to empower employers, placing them at the heart of the development of the skills system, this role does place additional burden on this stakeholder group. The application of the employer demand test within the approval of technical qualifications requires awarding bodies to engage directly with employers in the development and validation of technical qualifications. Naturally, this requirement for increased engagement with employers has an impact on the volume and nature of requests they might receive from the awarding sector to input into design and validation activities. In response to this, the employer demand test is kept under review to ensure it does not place undue burden on applicants.

The changes described in this consultation place no additional requirements on the trailblazer groups who work with IfATE to develop occupational standards. These employers have played a central role in developing the occupational standards against which technical qualifications must map. Approval of technical qualifications will continue to provide employers with a clear, recognisable and high-quality qualifications market.

IfATE is, however, alert to the increasing demands it may place on other member employers, such as route panel members – as it seeks to engage them in relation to even more technical qualifications. IfATE is reviewing its approaches to employer engagement. IfATE will continue to work with its employers to ensure it is able to maximise the expertise they bring, without them being over-burdened by expanded responsibility. As with its general application of the employer demand test, IfATE's process for using route panels' expertise within approvals is kept under regular review to ensure it is maximising the added value from these activities.

The final identified impact for employers is the need to ensure that all employers understand the future technical qualifications landscape being created. To support understanding, IfATE will not only be required to work directly with employers, but also with the wider awarding and provider sectors to ensure that pertinent qualification information is communicated clearly and accurately.

Overall, it is expected that the net effect on employers will be a positive one, with the skills system resulting from the activity being one which better represents their needs, is more reflexive to changes in the economy, and can be more clearly understood and navigated.

Awarding bodies

IfATE has made every effort to ensure that the categories and associated requirements proposed for levels 4 to 6 provision mirror, as closely as

possible, those set at level 3 and below. The majority of Ofqual regulated awarding bodies operating at level 4 and above also operates at level 3 and below; therefore, IfATE believe this consistency between levels will limit the impact of awarding bodies needing to adjust to the new landscape.

IfATE is, however, conscious that the proposed approval categories and associated requirements represent a change from those previously in place for qualifications wishing to attract public funding at levels 4 to 6. The primary change is the increased requirement for awarding bodies to work with employers in the development and validation of their qualification materials. This engagement represents an additional time, resource and, in some cases, monetary commitment from awarding bodies in the development of technical qualifications. In response to this, IfATE keeps under review its application of the employer demand test to ensure it does not place undue burden on applicants. It is also expected that processes and relationships developed by awarding bodies as part of the preceding reform activities (T levels, Higher Technical Qualifications, Level 3 and below reforms) can be used to satisfy this process, thus limiting the impact further.

An additional impact of the DfE's intended reforms is the increased emphasis on modularity and modular assessment. Some awarding bodies already deliver modular provision, for example, the 'HNFlex' model. However, for some, this will represent a change in how qualifications might routinely be awarded, i.e., more claims for module certification rather than qualification certification. In response to the requirements set by IfATE within its approvals process, it is likely that awarding bodies will be required to modify elements of both their qualification design and quality assurance of qualification delivery. It is expected that awarding bodies and the provider sector collaborate to agree ways in which modular learning can be best delivered and awarded; ensuring this operates effectively as both a student-centric and commercial model.

The categories specified by IfATE may also have the potential to exclude qualifications which would otherwise have been submitted for funding. To counter this, the consultation is seeking views on whether any qualifications which are currently valued in the market would be excluded because of the described categories. IfATE will use this intelligence to ensure that its specifying of categories does not unintentionally exclude anything from the landscape which may be of value to students and employers. Ultimately, it is expected that the advent of the LLE, alongside the increase in flexible provision, will represent an opportunity for awarding bodies to deliver a more flexible offer to students. The increased emphasis on employer engagement ensures that this offer is built around the needs of industry, acting to ensure that students are being delivered modules and qualifications which prepare them to enter and progress within the workforce.

Education and training providers

The categories specified by IfATE may also have the potential to exclude qualifications which would otherwise have been used by education and training providers. To counter this, the consultation is seeking views on whether any qualifications which are currently valued in the market would be excluded because of the described categories. Any future approvals process will seek to ensure it does not unduly exclude qualifications from the landscape which may be of value to students and employers. Outside of unintended omissions, the proposed categories in this space seek to ensure that the selection of available qualifications in future will be only those that are of high quality and reflect the needs of employers.

An additional impact of the intended DfE reforms is the increased emphasis on modular delivery and assessment. Many providers will be well versed in delivering qualifications in a modular format. For some, this will represent a change in how qualifications might routinely be delivered and how curriculums may need to be arranged (i.e., students rolling on and off programmes). Where necessary, providers will be required to modify elements of both their curriculum design and delivery to accommodate the intended changes. It is expected that provider and awarding body sectors collaborate to agree ways in which modular learning can be best delivered and awarded, ensuring this operates effectively as both a student centric and commercial model.

Clear communication of module/qualification outcomes and accessible course materials will be central to assisting providers who choose to move to a more modular delivery system at levels 4 to 6. It is for this reason that IfATE poses questions in both these areas within this consultation, with gathered intelligence to inform its approvals process. Setting clear expectations as part of approvals allows the approvals body to steer the awarding sector in developing provision which maximises the flexibilities afforded through the LLE, whilst ensuring technical qualifications still deliver the workplace competencies for which they are valued in the system.

Students

The Department for Education completed an equality impact assessment as part of its consultation in relation to the [lifelong learning entitlement](#). This assessment primarily pointed to the positive impact that the introduction of flexible, modular, learning might have on groups previously unable to access learning. This included neutral or beneficial impacts of the measures on individuals across the spectrum of protected characteristics. Approval of flexible technical qualifications will assist the Department in realising these benefits for students.

As with other impacted on groups, the categories set out by IfATE may also have the potential to exclude qualifications which would otherwise have been popular with students. To counter this, the consultation is seeking views on whether any qualifications which are currently valued in the market would be

excluded because of the described categories. Any future approvals process will seek to ensure it does not unduly exclude qualifications from the landscape which may be of value to students and employers.

In their totality, IfATE's proposed categories are designed to ensure that students are being delivered learning which is set against employer-led standards and validated by employers as fit for purpose. Additional information sought within this consultation seeks to ensure that approved technical qualifications outcomes are clearly articulated and delivered in a flexible but effective manner; with the result being an enhanced technical qualification offer at levels 4 to 6.

Professional, statutory, and regulatory bodies

As with all current approvals, IfATE is keen to ensure that statutory and professional bodies endorse the products it approves. To facilitate this endorsement, IfATE set as a requirement of submission that the awarding body has sought to engage any known bodies as part of its design and validation activities. For statutory bodies, this is a mandatory requirement of approval. To strengthen these checks, IfATE contacts relevant bodies during the act of approval, checking their endorsement of the qualifications it approves.

Like employers, these additional actions may be seen to produce increased time and resource burden on these bodies due to the number of engagements required. It is however expected that these engagements will not be much more than those which would ordinarily be required to ensure that technical qualifications suitably reflect the needs of these bodies and their membership.

The categories specified by IfATE may also have the potential to exclude qualifications which would otherwise have been deemed as valued by these bodies. To counter this, the consultation is seeking views on whether any qualifications which are currently valued in the market would be excluded because of the described categories. Any future approvals process will seek to ensure it does not unduly exclude qualifications from the landscape which may be of value to students and employers.

Additions to general impact assessment

Having reviewed feedback from across the consultation, IfATE has identified the following additional areas to reflect within the impact assessment. These areas may apply to one or more of the stakeholder groups listed above. IfATE will consider these additional impacts in the implementation of work in this space.

Change fatigue

IfATE recognises that recent reform has caused a substantial amount of change within the system. Every effort has been made to ensure the

proposals at levels 4 to 6 as far as possible reflect changes made at levels 3 and below. IfATE believe that achieving alignment across the technical qualification offer will, in time, lead to a stronger, simplified technical education system.

Employer fatigue

IfATE noted this impact within its initial impact assessment but acknowledge this as a persistently reported impact of the reforms. IfATE believes employer input is essential to the process of developing and approving high-quality technical qualifications. As included in its impact assessment, application of the employer demand test is kept under review, to ensure submission requirements are proportionate to the assurances sought.

The need for clarity within the approval process

IfATE acknowledges the need for clarity within approvals work. Approvals ensure only high-quality, employer recognised qualifications are approved as 'technical qualifications'. In doing this, there will likely be a reduction in the number of qualifications which meet the quality requirement. Any requirements for approval will be set out explicitly, prior to submissions. Whilst maintaining the central aim to safeguard the quality of technical qualifications, approvals work aims to reduce unnecessary bureaucracy and burden, with improvements made to processes that are based on stakeholder feedback.

A drop in employer funded training

Both through the consultation and consultation events, IfATE heard concerns about employers seeing the LLE as a reason to reduce their own training spend.

IfATE acknowledges concerns relating to employer spend on training. Whilst the LLE is an exciting new funding offer, it does not and should not replace employer investment in training. Whilst qualifications and modules approved as 'technical qualifications' will be made available within the LLE, this is not the only means of funding them. IfATE's message to employers is that greater availability of modules serves to provide them greater options for upskilling their workforce. Employers should still, where possible, seek to fund such training on behalf of their employees and not pass the cost on to individuals. This messaging will be made clear during the development of the modular system.

Development, submission and maintenance related costs

Some further points were made by respondents in relation to the burden placed on awarding bodies within the process. Many of these were covered in IfATE's initial impact assessment. However, some provided additions, or additional detail on specific impacts.

IfATE appreciates respondents' concerns in this space. The adoption of any new approach to design and awarding can come with additional costs. For HTQs, qualifications are expected to adopt a modular format, with non-modular formats permitted by exception. It should be noted that IfATE does not mandate within the suggested categories the need to make submitted qualifications modular.

Some reported cost impacts were for the initial set up stage only (process, system and training), with others being recurring costs (development and awarding). Initial costs to start delivering modular provision are unavoidable, given the change to the delivery system. Regarding ongoing costs, approvals processes are kept under review with the aim to reduce unnecessary bureaucracy and burden. Improvements made to processes are based on stakeholder feedback.

ANNEX A: Breakdown of responses

The consultation generated 24 responses, primarily via the online questionnaire, with five respondents emailing a response instead. Respondents included employers, awarding bodies and representative bodies. Participation in the consultation was on a self-selecting basis.

Representative bodies included those responsible for representing multiple viewpoints. One such body has a community of up to 180,000 professional members.

Responses were also received from bodies representing FE, HE, and awarding body interests. These included:

- Association of Colleges (AoC), whose members make up over 90 per cent of the sector (source: [AoC website](#))
- Independent Higher Education (IHE), which represents over 80 providers of higher education, professional training and pathways in the UK (source: [IHE website](#))
- Federation of Awarding Bodies (FAB), which represents over 120 UK awarding bodies (source: [membership list](#), [FAB website](#))

(figures correct as of October 2024)

Table 1: Stakeholder types which responded to the consultation via the online questionnaire.

STAKEHOLDER TYPE	NUMBER OF RESPONDENTS	PERCENTAGE OF RESPONDENTS
Awarding body	2	11%
Awarding body / Professional body	1	6%
College, training provider or university	2	11%
Employer	2	11%
Employer / Awarding body	1	6%
Professional body	1	6%
Other	9	50%
Total	18	100%

(Calculations exclude one blank response. Responses have been manually adjusted to account for a questioning error that was rectified after two responses were received.)

Respondent types that were specified by those opting for 'other':

- Care Association
- Consultant
- Mayoral Combined Authority
- Qualification developer
- Representative body
- Sector trade body / membership organisation
- Tutor

Respondents were not required to answer each question. This means that the percentages stated in the response sections only relate to those opting to answer that specific question.



IfATE Institute for
Apprenticeships
and Technical Education

Shaping skills training

