

Pearson response to the BIS consultation on A dual mandate for adult vocational education

Introduction

Pearson welcomes the opportunity to contribute to this consultation on adult vocational education. As the consultation paper points out, whilst adult vocational education is a valuable part of the adult skills system it is often neglected by press and policy makers. It is also neglected in terms of public investment: this year alone adult education faces a 17% cut; 24% when protections are taken into account¹. This consultation provides a valuable opportunity to examine the importance of adult vocational education to individuals, employers and the economy as a whole, to increase its visibility, develop a clearer understanding of its mandate, and to open a conversation about its future.

Over two million people benefit from adult education in England each year². Adult education providers offer a broad and comprehensive range of provision from basic literacy and numeracy and life skills, through to education and skills for progression to further study and higher education, and for entry to a first job or advancement in a professional career. Adult vocational education supports individuals of all ages and abilities to shape and achieve their aspirations by offering unique provision that that gives individuals opportunities not available from schools or universities. It equips employers with the skilled employees they need to develop their business and plays an essential role in the drive to meet the skills needs of the current and future UK workforce³.

Pearson, as the world's leading education company, plays a central role in the development, delivery and assessment of further and higher education. We work closely with colleges, universities, training providers and employers to design and develop qualifications and training that has true value, improves individuals' life chances, and reflect the changing needs of UK business.

¹ Skills Funding Agency Allocations for the Funding Year 2015 to 2016
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/407468/Allocations_for_the_Funding_Year_2015_to_2016.pdf

² Further Education and Skills: Learner Participation, Outcomes and Level of Highest Qualification Held,
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/432351/SFR_commentary_March_2015_Ofqual_Update.pdf

³ BIS (March 2011) 'Further Education boosts economy by £75 billion' <https://www.gov.uk/government/news/further-education-boosts-economy-by-75-billion>

Pearson's approach

This submission considers some of the broad themes raised in the consultation and makes recommendations as to how these might be addressed, namely:

- A dual mandate for adult vocational education
- The role of technology in further education
- Higher level vocational qualifications
- Employer engagement in higher level vocational education
- Funding higher level vocational education and priorities
- Adult further education and 'second chances'
- Adult education at lower levels and programmes of study

A summary of the recommendations can be found on pages 3 and 4.

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Summary of recommendations

Pearson recommends:

A dual mandate for adult vocational education

- BIS works with the DfE to produce a fuller analysis of the nature of the further education system to better recognise its breadth before we can look to address the challenges that face the sector.

The role of technology in further education

- A national strategy is formulated for enhancing learning and assessment through the use of technology.
- Joined-up cross-institutional IT/e-learning/e-assessment strategies are encouraged and partnerships forged between providers to achieve return-on-investment and exchange of good practice.
- BIS continues to provide resources to develop a sustainable IT infrastructure in the FE sector.
- Support is provided for establishing e-learning and e-assessment management structures.
- Schemes are introduced to recognise and reward innovation in the use of educational technology to provide further incentives to providers to adopt these.
- The recognition of 'open badges' and other forms of recognising informal learning is supported and enabled.
- Better regulatory support for the use of e-assessment including clear quality and validity measurement frameworks is developed.

Higher level vocational qualifications

- Higher level vocational education provision is subject to the same quality assurance and approval principles, and regulatory requirements as undergraduate programmes.
- BIS works with the sector to ensure potential applicants for higher level vocational education provision, their parents, their schools, and information, advice and guidance professionals are better informed, not only of the higher level vocational education choices available to them, but of the strengths, currency and high quality of these learning opportunities.
- Work experience is strongly recommended in higher level vocational education provision but not mandated given the practicalities. Work related learning should be mandated in higher level vocational education provision.

Employer engagement in higher level vocational education

- Steps are taken to ensure that any centralisation, in the form of identifying National Colleges/national centres of expertise with regard to occupational skills and sector specific education, does not inhibit creativity and innovation.
- BIS explore the feasibility of setting up structures to support a collective approach in order to support employer engagement with the vocational system.
- The approach currently taken by the DfE and BIS in evidencing employer support for vocational qualifications is reconsidered, and instead, the extent to which a robust process of engaging employers in the design and endorsement of qualifications can be used to evidence employer and industry support is explored.

Funding higher level vocational education and priorities

- Higher level vocational education provision is subject to the same funding and student support as undergraduate programmes.

Adult further education and 'second chances'

- The term 'second chance' is not used as it is misleading in many cases and in those cases where it might apply is an unhelpful characterisation.

Adult education at lower levels and programmes of study

- Qualifications should not be dismissed at lower levels. The prospect of achieving a qualification as a stepping stone to further achievements can motivate and engage learners working at all levels and in particular at lower levels. Qualifications signal and recognise an individual's achievement and competence, their capacity and readiness to move on in their learning and in their work, or in some cases, directly into new jobs.

A dual mandate for adult vocational education

The consultation proposes that (section 111):

"The notion of 'further education' as a catch all for non-university, post-school education is outdated, and represents a dangerous conflation of two very different types of training."

Pearson agrees further education covers a wide remit and fully supports the development of a clearer mandate. Further education has suffered from a lack of clarity which has had a negative effect on its importance in the public eye and on its priority for public policy. We do not support the view however that further education falls neatly into the 'dual remit' proposed in the consultation. This simplification hinders rather than helps our understanding of the sector and we therefore have a number of concerns about ascribing this it as having a 'dual mandate'.

- We agree the provision of higher adult vocational education for the workplace is a neglected and sometimes confusing area of the skills landscape and that policymakers are right to focus on it. However, focussing on it to the exclusion of adult vocational education at levels below level 4 clouds our understanding of adult vocational education as a whole, including progression pathways from lower to higher level vocational education and the importance of these for many learners in the adult vocational education system. The middle ground – the provision for those who have the basics but are not quite ready to take up the higher levels – learners with level 2 achievement, perhaps, who need some level 3 before they can take advantage of the higher level provision – isn't addressed and would benefit from further analysis and additional research.
- Other key components are also missing which it would be useful to include in any analysis which aims to develop a full and shared understanding of the purpose and importance of our adult education system. Work-based learning providers are barely referenced, and, although given BIS' remit the consultation will focus on 19+ learning, many institutions offer provision to a wider age-range than 19+. The dual mandate does not take into account academic provision offered in further education yet adult education does not just cover vocational and lower level education. It is also important that provision for 16-19 learners is considered as much of this provision is fully integrated with 19+ provision and the one cannot be understood, or planned for, without taking the other into full consideration.
- Confining our definition of adult education to the two mandates alone will not help if our aim is to understand adult further education, clarify its remit, and set out an ambitious plan for its future. If we try to make plans for adult education based on the dual mandate as defined in this consultation we risk making inappropriate proposals regarding its structure and funding.

Pearson recommends:

- BIS works with the DfE to produce a fuller analysis of the nature of the further education system to better recognise its breadth before we can look to address the challenges that face the sector.

The role of technology in further education

Technology underpins everything Pearson does, from the latest resources for personalised learning to data analysis tools to measure progress and aid teaching. By putting technology at the heart of learning, we aim to support, motivate and inspire every educator and every learner. While Pearson does not believe technology is a silver bullet, we believe that the powerful combination of teacher expertise, supported by technology and useful data, is the most promising route for delivering positive learner outcomes.

- Digital technology can play a critical role in enabling people to develop the skills they need to access, sustain and progress in education and employment. It can also provide increased capabilities to those leading vocational institutions as well as to those providing vocational education to improve the delivery of learning and training, including to people who may not have previously been able to access formal education.
- Digital technology can provide novel and innovative approaches to deliver, assess, and manage formal and informal learning, be it at lower levels, or in higher level academic or vocational education, making it more accessible, more responsive to learner needs and employer demands, as well as more portable, to enable providers to retain and recruit more learners.
- Over 50% of students undertake prescribed HE courses at level 4 and above in further education institutions⁴. Blended e-learning and online only provision can contribute to a more flexible and diverse learning environment for these learners. In addition, college location is often cited as the main determining factor for students' choice of study, hence digital learning can open up choices, particularly in the light of plans to centralise and specialise provision and create National Colleges. Flexible online learning should not, of course, be seen as a poor substitute for other forms of learning.
- Despite the increasing expectation of anytime anywhere learning, many learners still prefer to attend traditional lectures complemented by online materials⁵. The model of online only and virtual classroom delivery, as demonstrated by a number of MOOCs, does not suit every learner and cannot be relied on as the sole strategic approach to growth for colleges. Colleges need to consider the extent to which technological innovation needs to be built into e-learning strategies and the role of the teacher/tutor is crucial in the development of blended solutions. Technology is an enabler of learning as opposed to being a panacea; how it can be used to deliver quality learning needs to be clearly understood.
- Considerable gains can be had from using digital technology for measuring performance. It can also be used as an aid to efficient administration and to help check the authenticity of student work.
- Online simulations and the gamification of learning and assessment can offer failsafe environments to learn and develop skills, as well as new ways of measuring problem-solving, enquiry-based learning and other types of skills that traditional forms of assessment are not currently able to assess adequately. Further research is needed into what data to gather, and how to use such data for measuring performance.

⁴ Widening Participation and non-continuation indicators for FE Colleges. HEFCE 2012/20

⁵ <http://www.aoc.co.uk/sites/default/files/Experience%20of%20full%20time%20Students.pdf>

- Learners also contribute to collaborative and participatory online communities, in which they create and publish digital content. As such practices evolve and become more prominent, valuing learners' contributions will become more important. Online 'open badges' are already being used to acknowledge learning achievement, and are emerging as the new standard in communicating learner capabilities to employers.⁶
- Finally, the high expectations placed on 'big data' mean that educational companies such as Pearson must strive to add value in the area of measurement. Our focus should be communicating the most important insights about learning that technology can gather to those who need it most – teachers, senior managers in education, and learners. If we can provide clear, relevant, prioritised and actionable information about learning we can help teachers and learners to make even more difference to the progress those learners make.

Pearson recommends:

- A national strategy is formulated for enhancing learning and assessment through the use of technology.
- Joined-up cross-institutional IT/e-learning/e-assessment strategies are encouraged and partnerships forged between providers to achieve return-on-investment and exchange of good practice.
- BIS continues to provide resources to develop a sustainable IT infrastructure in the FE sector.
- Support is provided for establishing e-learning and e-assessment management structures.
- Schemes are introduced to recognise and reward innovation in the use of educational technology to provide further incentives to providers to adopt these.
- The recognition of 'open badges' and other forms of recognising informal learning is supported and enabled.
- Better regulatory support for the use of e-assessment including clear quality and validity measurement frameworks is developed.

⁶ Acclaim is a Pearson Open Badge platform, which offers institutions an easy way to issue verifiable, web-enabled representations of student learning achievements. Students can share their achievements on LinkedIn, Facebook, Twitter, and other social and professional networking sites, to help better communicate their abilities. Employers can also use Acclaim to verify achievements represented in shared Acclaim badges. (www.youracclaim.com)

Higher level vocational qualifications

There is currently an excellent supply of well-respected higher level vocational education provision available in the UK and in our liaison and consultation providers have reported ambitions to grow this sector of their work, and report their capacity for such growth.

We agree that many providers of vocational learning often have outstanding sector specific strengths in their vocational provision; but their higher level vocational education provision is often small within the organisation, which can make it difficult to invest in employer engagement, qualification design and approval, and to provide the necessary resources to support students. It may be that proposals to empower further education institutions to develop and award higher level vocational qualifications relevant to their sector would allow providers to respond more quickly to local demand and employer requirements than they are currently able; however many providers will not have the capacity to invest in such developments, especially where they have low student numbers on higher level vocational education programmes.

The consultation sets out a vision which includes the ambition that (section 42):

"There will be a parity of esteem between academic higher education and higher level vocational education."

And explains that:

"We cannot bring this about by assertion. It can only come about by creating conditions in which parity of esteem is earned."

- We agree that the creation of the conditions on which parity of esteem is earned, rather than assertions of parity, is key to resolving the historical underdevelopment of the higher level vocational sector. Assertions of parity force people to focus on the wrong things. We need to move away from any attempts to compare 'academic' and 'vocational' learning and instead create an environment where both can flourish with clearly defined outcomes.
- To ensure both can flourish, we consider both should be subject to the same quality assurance and approval principles, and regulatory requirements. This will help to dispel any views that academic programmes validated by a university are more demanding and/or hold a higher currency with employers/students/parents than higher level vocational education.
- Potential applicants, their parents, their schools, and information, advice and guidance professionals need to be better informed, not only of the higher level vocational education choices available to them, but of the strengths, currency and high quality of these learning opportunities. We believe there remains a sense in England that higher level vocational education is 'second best'.
- Work related learning is an essential component of higher level vocational education and we strongly recommend work experience be a part of any vocational course. The right work experience can make a difference to an individual's prospects, particularly where employers prefer to recruit people who have had at least one job. However, we recognise that mandating work experience is not practicable in some subjects and/or regions. We would recommend work related learning be mandated rather than work

experience; this may include work experience, but could also include work place simulation, assessments set/reviewed by employers and industry bodies.

Pearson recommends:

- Higher level vocational education provision is subject to the same quality assurance and approval principles, and regulatory requirements as undergraduate programmes.
- BIS works with the sector to ensure potential applicants for higher level vocational education provision, their parents, their schools, and information, advice and guidance professionals are better informed, not only of the higher level vocational education choices available to them, but of the strengths, currency and high quality of these learning opportunities.
- Work experience is strongly recommended in higher level vocational education provision but not mandated given the practicalities. Work related learning should be mandated in higher level vocational education provision.

Employer engagement in higher level vocational education

The role of employers and industry bodies in the development, design and accreditation of higher level vocational education is crucial to its currency. However, engagement with employers and industry bodies has to be implemented in a manner which does not place an onerous bureaucratic burden upon the employer, and does not include their contribution only at the development stage of a qualification but allows for involvement in assessment of outcomes and in periodic review. Many employers are unable to commit to working with a large number and range of providers; additionally some providers may have less well developed networks of employers on which to call.

- Allowing National Colleges and/or national centres of expertise with regard to occupational skills and sector specific education, to lead nationally on employer engagement for a sector, and lead the development and design of appropriate qualifications which are nationally available to other centres, would allow sector employers/professional bodies to more deeply engage, and would support vocational standards nationally. However, steps would need to be taken to ensure that this level of centralisation does not inhibit creativity and innovation.

Such qualifications should also be designed to map to relevant professional body requirements for the sector. In this manner employer skill requirements will be embedded within the qualification; the student would be able to attain dual accreditation - the qualification and professional body recognition – increasing the currency and reputation of that qualification.

- Our research⁷ into the role, purpose and value of vocational education and training (VET) in a range of countries that are regarded as having high performing general education and/or VET systems shows that these countries tend to have a system in which structures are created by central government to enable social partners to work together to develop and/or oversee the content of vocational provision. Employer engagement is a crucial element of this. For example, in Alberta, Canada, provincial industry advisory committees are involved in monitoring standards and supporting employers in the development of training and certification standards for new and emerging occupations; in Austria each apprenticeship has a national training regulation designed by advisory councils comprising the social partners (government, employers and trade unions) setting out the competence-based curriculum to be followed in the company, and in Denmark the governance structure of initial vocational education and training is through a combination of national laws and a social partnership between employers, trade unions and government.
- Our experience of engaging with industry to define and develop vocational qualifications, at any level, has led us to characterise employer engagement as being made up of two distinct parts.
 - Engagement in the design, development and endorsement of qualifications, and
 - Involvement in local delivery and assessment.

Across both areas there are a number of common factors.

⁷ Vocational Education and Qualifications: An International Comparative Review by Professor Lorna Unwin, Chair in Vocational Education, Institute of Education, University of London, unpublished but available on request.

- Research into industry needs, and an ability to engage and support local delivery.
- The use of, and alignment to, industry standards (both national occupational standards and professional body standards).
- A continuous cycle of communication to raise understanding and awareness of the employers not involved directly in the design and endorsement of the qualifications.
- The impact on the learner and their employability.

Pearson requires a level of engagement over and above government and regulatory requirements. In following these principles we engage employers in a number of phases of work, before a qualification goes live. This approach is fundamental to ensuring qualifications are of high value, are endorsed, and support learners to progress in to, or in, work.

- Research needs to inform a qualification design brief, with individual employers and groups of employers and representative bodies.
- Formal review of structures and content at a number of predetermined stages, as qualifications are developed.
- Production of specific guidance on assessments (tasks and project briefs) that may form part of the qualification to ensure industry relevance.
- Endorsement of qualifications as being fit-for-purpose and appropriate on completion of qualification development.

For Pearson, employer involvement in local delivery and assessment is also key and one which is largely overlooked in this consultation. The extent to which a qualification's structure and content can facilitate local employer and college partnerships in the delivery, and potentially assessment of the qualification, needs to be identified. In defining what local involvement might include, we would look at the role of high quality work experience or, where this isn't practicable, work related learning; the potential for employers to assist in class based delivery; and the potential for employers to offer their facilities to allow students to learn in the work environment. This is as applicable to higher level as it is to lower level vocational qualifications, and critical in developing learners' industry experience and employability.

- We would caution against prescribing certain methods of evidencing employer endorsement. The DfE and BIS currently require employer letters of support as evidence that vocational qualifications are fit for purpose and necessary for a sector. There is a real danger that the provision of letters of support could become superficial and prove to be a burden on the employers providing them if this requirement is extended to higher level vocational qualifications.

Pearson recommends:

- Steps are taken to ensure that any centralisation, in the form of identifying National Colleges/national centres of expertise with regard to occupational skills and sector specific education, does not inhibit creativity and innovation.
- BIS explore the feasibility of setting up structures to support a collective approach in order to support employer engagement with the vocational system.
- The approach currently taken by the DfE and BIS in evidencing employer support for vocational qualifications is reconsidered, and instead, the extent to which a robust process of engaging employers in the design and endorsement of qualifications can be used to evidence employer and industry support is explored.

Funding higher level vocational education and priorities

Discussions about funding are inevitably discussions about priorities, and as the consultation points out (sections 80 and 81):

"Over the last decade higher level vocational qualifications have not been seen as a priority for funding, in part because of the original introduction of Public Sector Agreement targets at levels 2 and 3 and the adult entitlement which supported the full funding of qualifications at levels 2 and 3.

In short, therefore, public funding for the higher level vocational courses available in further education colleges has been squeezed out by funding both higher and lower level provision."

We need to be clear about our priorities for funding, and about where the funding for different qualification types comes from. We would agree with the statement in the consultation that (section 83):

"England has two national funding systems for adult education, and whilst there is excellent higher vocational education provision in both, for neither of them is it their main, nor core, business."

This is particularly important in the light of the skills shortage and questions over what our skills base will look like, and how we need it to look, in 10 years' time. Funding for higher level adult vocational education faces the following challenges:

- The budget for adult education is neglected in terms of public investment: this year alone adult education faces a 17% cut; 24% when protections are taken into account⁸. The difficulty for FE is that expansion of higher level vocational education, even where they have the will and the expertise to expand, is problematic within these budget constraints.
- Resources for higher education are far larger than for adult vocational education in further education. The Hefce recurrent grant for teaching and estimated fee income from students will be £8.9bn in 2014-15 and potentially £9.8bn in 2015-16⁹. This is three times the adult education budget for teaching which, when including the budget for 24+ advanced learning loans, comes to £3bn for 2015-16¹⁰.
- Furthermore, funding for higher level vocational education falls between two stools. Hefce loan fund prescribed HE which includes sub-degree level qualifications such as Higher Nationals but does not fund other professional and technical qualifications at levels 5 and above which are the responsibility of the Skills Funding Agency. The Skills

⁸ Skills Funding Agency Allocations for the Funding Year 2015 to 2016

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/407468/Allocations_for_the_Funding_Year_2015_to_2016.pdf

⁹ Funding for higher education in England for 2015-16: HEFCE grant letter from BIS,

<http://www.hefce.ac.uk/media/hefce/content/news/News/2015/Higher%20education%20funding%20letter%202015-16.pdf>

¹⁰ Skills Funding Agency (SFA) Priorities and Funding for the 2015 to 2016 financial year,

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/406881/Vince_Cable_and_Nick_Boles_to_Peter_Lauener_-_Skills_Funding_Agency.pdf

Funding Agency on the other hand does not fund, or loan fund, provision above level 5. The different funding mechanisms also means that higher-level apprentices often need to access two different funding systems

We need to ensure responsibility for funding higher level vocational education is clear. With limited budgets, and competing and crucial lower level priorities, it is unlikely the Skills Funding Agency is in a position to give higher level vocational education the focus it needs. Hefce however manages the far larger higher education budget and their focus is on higher level skills.

The consultation sets out an aim that (section 42):

"There will be a parity of esteem between academic higher education and higher level vocational education."

And explains that:

"We cannot bring this about by assertion. It can only come about by creating conditions in which parity of esteem is earned."

To meet this vision of parity of esteem between academic higher education and higher level vocational education, we consider that both should be subject to the same funding mechanisms and provide the same level of student support. We do not support the differential funding model for university based higher education from levels 4 to 6 and higher level vocational education in further education at the same levels; it only serves to reduce opportunities in widening access to higher level vocational education and compound the view that higher level vocational education is not equivalent in standard and reputation to degree level programmes delivered in universities.

Having one body with an overview of the whole of our higher level education system would result in a far more structured approach. It would also put higher level vocational provision on the same footing as higher level academic education by giving students access to the same level of support.

Pearson recommends:

- Higher level vocational education provision is subject to the same funding and student support as undergraduate programmes.

Adult further education and 'second chances'

We are concerned about the use of the term 'second chance' to describe any provision in further education. The term does not reflect the complexity and range of provision offered and more importantly, even for those learners coming back into education after underachieving at school, the term is a misleading one. It suggests learners are being given a second chance whilst for many, after an unsuccessful time at school, their time in adult further education could reasonably be described as their first chance. Furthermore, it is couched in negative terms. Even for those it does accurately capture, it focuses on 'deficit' rather than on the positive nature of the education it offers, and the opportunities for progression and improvement of life chances it provides.

Pearson recommends:

- The term 'second chance' is not used as it is misleading in many cases and in those cases where it might apply is an unhelpful characterisation.

Programmes of study

The consultation suggests that at lower levels providers need greater flexibility about how to structure provision to deliver good outcomes for learners, and that this may not necessarily need to include qualifications. We support this flexibility but are keen to caution against dismissing qualifications at this level completely. Qualifications are important in many respects as they:

- Act as the gateway to jobs in certain sectors.
- Provide confirmation of achievement to employers and providers.
- Motivate learners who might otherwise not be in learning.

The BIS report on motivation and barriers to learning for young people (18-24) not in education, employment or training¹¹ found that qualifications were consistently one of the three main motivations to engage in education and training. Gaining a qualification was perceived to be both a gateway to employment and a measure of personal development.

Pearson recommends:

- Qualifications should not be dismissed at lower levels. The prospect of achieving a qualification as a stepping stone to further achievements can motivate and engage learners working at all levels and in particular at lower levels. Qualifications signal and recognise an individual's achievement and competence, their capacity and readiness to move on in their learning and in their work, or in some cases, directly into new jobs.

¹¹ BIS Research Paper Number 87, Motivation and barriers to learning for young people not in education, employment or training, February 2013,

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/70141/bis-13-548-motivation-and-barriers-to-learning-for-young-people-not-in-education-employment-or-training.pdf