

NUS Consultation Response: Building our Industrial Strategy Green Paper

Introduction

1. The National Union of Students (NUS) is a confederation of 600 students' unions, amounting to more than 95 per cent of all higher and further education unions in the UK. Through our member students' unions, we represent the interests of more than seven million students. NUS represents students and students' unions to ensure that education is transformative, skills and learning are accessible and every student in the UK is empowered to achieve their potential.
2. NUS membership includes student representative bodies from around 300 further education, sixth-form and specialist colleges in England, representing the overwhelming majority of learners in further education across the country.
3. In 2014, NUS established the National Society of Apprentices (NSoA), giving a voice to 200,000 apprentices nationally and supporting the development of local apprentice voice structures through the 200 providers and employers currently engaged with the society.
4. NUS welcomes the opportunity to respond to the *Building our Industrial Strategy* green paper. The response primarily focuses on the "Developing Skills" pillar, though it also makes reference to the pillar on "Investing in science, research and innovation."

Executive Summary

5. NUS are responding to this Industrial Strategy on behalf of further education learners and higher education students.
6. This response includes direct feedback from further education learners on some of the key issues in the "Developing Skills" pillar; basic skills, basic skills qualifications, the transition year and the 15 routes. This follows different consultations with learners over the past 18 months
7. NUS broadly welcomes from the Industrial Strategy:
 - The strong focus on developing skills.
 - Financial support for postgraduate research students and further education students in the form of maintenance loans.
 - The concept of a transition year for learners who have left secondary education without basic skills.
 - Clear, high quality routes for technical education, with a focus on excellent teaching and the introduction of high quality work placements within them.
8. However we believe that in order for the Industrial Strategy to be effective the Government must:
 - Invest in increasing the diversity of students entering and remaining in the research and innovation sector.

- Expand the definition of 'basic skills' to accurately reflect what skills learners believe are a necessity.
- Ensure that learner voice is embed into the work around the 15 routes and the transition year by holding consultations with learners and creating learner panels that sit alongside employer panels.
- Create financial parity of esteem with higher education and make maintenance loans available for all technical courses, not just those at Institutes of Technology or National Colleges.
- Ensure that learners have equal access and opportunities within technical education by; financially supporting disadvantage learners and developing proposals that adequately consider the needs of pre-entry, level 1 and level 2 learners within the 15 routes.

Question 2. Are the 10 pillars suggested the right ones to tackle low productivity and unbalanced growth? If not, which areas are missing?

9. NUS believe that the ten pillars cover an important range of areas to tackle low productivity and unbalanced growth. We particularly welcome the focus on developing skills within the Industrial Strategy. For too long Further Education (FE) has been the subject of unprecedented government cuts and fragmented policymaking. However, the recognition set out in the green paper that FE needs both monetary investment and a clear, cohesive strategy that delivers for the individual and the wider economy is welcome.

Question 3. Are the right central government and local institutions in place to deliver an effective Industrial Strategy? If not, how should they be reformed? Are the types of measures to strengthen local institutions set out here and below the right ones?

10. To ensure the Industrial Strategy is as effective as it can be, significant cross-departmental collaboration will be required. We have concerns about the ability of governmental departments to collaborate, due to their often siloed nature.
11. For example, the Government's ambitions for developing skills and encouraging lifelong learning will require substantive, close cross-departmental collaboration, particularly between the Department for Education, the Department for Business, Energy and Industrial Strategy and the Department for Work and Pensions. This interrelationship and developing interdependency will need to be managed effectively in order to adequately deliver the skills section of the strategy.
12. As such, NUS supports **the recommendation for the creation of a joint minister for lifelong learning between the DWP and the DfE, made by the Skills Commission.**¹
13. In addition, both government and local institutions will need to take into account the needs of their key stakeholder, the learners. Whilst we welcome steps to amplify the views of learners through the apprentice panel of the Institute for Apprenticeships (IfA), years of budget reductions and new freedoms have hugely decreased the quality and investment in learner voice within local institutions. As a key method to strengthen local institutions accountability and partnership work, **we would welcome a requirement for institutions to have a learner engagement strategy and invest in student-led voice structures.**

¹ Skills Commission, Spotlight on Older Workers Report, 2017

14. Housing is key to industrial strategy and economic growth, and also requires cross-departmental work. Adequately tackling the poor quality of housing in the UK would have significant benefits for living standards while reducing carbon emissions, reducing excess winter deaths and cold-related NHS referrals, reducing fuel poverty and the impact of cold homes on the physical and mental well-being of those living in them².
15. From a student perspective, our Homes Fit For Study research (2014)³, showed that over 60% of students living in the private rented sector have experienced either damp, mould or condensation in their current property. The research highlighted numerous instances where the quality of rented properties had a significant impact on the health and ability of the student to study. This should be a priority area given that the UK, as one of the most economically developed in Europe, lags so far behind on energy efficiency⁴.
16. **Our broad recommendation is that cross-cutting issues such as housing and education need to be consistently treated in a cross-departmental manner in order to make sure that the Industrial Strategy is effective.**

Question 8. How can we best support the next generation of research leaders and entrepreneurs?

17. Whilst we welcome financial support for postgraduate research students, **we believe that the next generation of researchers will be better supported by robustly funding the research councils, with particular focus on the subject areas of arts, humanities and social sciences, and diversifying grant-awarding criteria and research objectives.** This is intended to attract a greater diversity of researchers to postgraduate research study, opening up the sector and bringing a plurality of experience.
18. We are particularly concerned by the lack of progression of women and Black researchers within universities, both in terms of entering research degrees and progression through an academic career.⁵ It is well documented, for example, that Black women academics face double barriers to progression and are significantly underrepresented in research and academic staff.⁶
19. We do think there is a need to assess the demographics of students entering funded research programmes and to distribute funding in such a way that challenges existing equity gaps and ensures that the demographics of the research student body and therefore the next generation of academics diversify. We anticipate that a greater number of Black and woman academics entering funded postgraduate research and remaining in the profession will in turn encourage Black and women students to remain in academia, further diversifying the sector and supporting students who are currently under-represented in academia. Black students are also more likely to be from lower socio-economic backgrounds⁷ and the government has pledged that 20% of Black students must

² Verco & Cambridge Econometrics, Building the Future: The economic and fiscal impacts of making homes energy efficient,

³ NUS, Homes Fit for Study, 2014

⁴ Association for the Conservation of Energy, Fact-file: The Cold Man of Europe

⁵ NUS uses the term 'Black' to refer to people of African, Asian, Arab and Caribbean descent.

⁶ <http://www.runnymedetrust.org/blog/the-experiences-of-black-and-minority-ethnic-academics>

⁷ NUS, Race for Equality, 2011.

be in higher education by 2020.⁸ Supporting Black students to reach all levels of academia must therefore be a priority when supporting researchers.

20. **We believe that a greater diversity of students entering research and remaining in the research and innovation sector will greatly benefit UK industry, bringing a plurality of viewpoints and expertise leading to greater innovation, development and informed decision making.** It has been documented organisations led by a diverse, highly-qualified workforce outperform those organisations with all-male boards.⁹
21. We recognise that fostering the next generation of researchers will require more than funding models, it will also require effective support systems. We therefore emphasise the need for institutions to also deliver:
- a. Postgraduate-specific development opportunities and fair access to teaching opportunities
 - b. Postgraduate-specific and culturally competent mental health and welfare support – including that which will alleviate barriers particularly faced by researchers with caring responsibilities, including subsidised and suitable childcare.
22. We welcome the support that universities and colleges provide for young entrepreneurs on campuses across the country – particularly where they connect with local businesses to transfer new ideas, concepts and enthusiasm from campus into practical application. Competitions such as the Mayor's Entrepreneur prize in London offer an excellent way to encourage low-carbon innovation and inspire university and college students to consider how their particular area of expertise could be turned into a low-carbon business. Such programmes to foster innovation and entrepreneurialism should be expanded and adapted to other settings.

Developing Skills

Question 10. What more can we do to improve basic skills? How can we make a success of the new transition year? Should we change the way that those resitting basic qualifications study, to focus more on basic skills excellence?

Improving basic skills

23. The question around improving basic skills and a focus on 'basic skills excellence' naturally lends itself to a discussion about what actually constitutes basic skills. The green paper alludes to the basic skills of English, Maths and digital skills. **NUS, however, believes that a much broader definition is needed.**
24. Indeed, whilst English and Maths are undoubtedly important key skills which should be taught to learners in an appropriate way, any discussion about basic skills must go beyond the skills needed to work effectively and must also consider what a learner needs to know in order to play an active part in society.
25. NUS' belief in an expanded concept of basic skills is based on the feedback of learners from over 120 colleges across the UK. In October 2015, NUS agreed with the Department for Education (DfE) and Department for Business, Innovation and Skills (BIS) to develop and implement a learner voice process for the Area Reviews, which

⁸ Minister for Universities and Science, Higher education: fulfilling our potential *speech*, 2015

⁹ Grant Thornton, International Business Report, 2015.

included holding roundtables with learners. 19 reports in total were compiled following the roundtables, which can be found [here](#).

26. At these events, NUS asked learners what outcomes they hoped to receive from their education. Whilst students spoke on a whole range of issues, one response that was consistently fed back was the belief that FE providers and the sector should look to develop the 'whole person' and focus on a whole range of basic skills, including key life skills.
27. Central to this is a belief from students that colleges should offer the opportunity to learn basic life-skills that have not been taught in school, such as cooking, money and financial management and social skills. Students also want their education to provide them with wider, more practical skills for life after college: 'soft skills' to improve employability; political education to become active citizens; practical skills for independent living; and, social and civic skills, including sex and relationship education.
28. As such, any discussion of improving basic skills must be expanded to include a much broader range of skills that also boost productivity and employability, beyond those of Maths, English and digital. The teaching of these skills has to be included within the transition year and 15 routes, as proposed by the Post 16 Skills Plan. Indeed, they could be taught during the 'common core' of all the routes.¹⁰

Resitting basic qualifications

29. However, an immediate step the Government can take to improve basic skills is to change the way those resitting basic qualifications study. In the first instance this means the Government should remove the GCSE Maths and English funding condition in further education. As Ofsted found, general FE colleges have seen an increase of 156% in the number of students studying GCSE English over the last three years and these colleges have struggled to recruit enough teachers in English or mathematics.¹¹
30. The annual report also concluded that "the implementation of the policy is not having the desired impact in practice"¹² and that "too few students achieved passes at a higher grade when retaking GCSE English or mathematics."¹³ This was reflected in the data released in August 2016, which found that since the introduction of this policy, the overall number of GCSE entries among students aged 17 and over increased by about a third; however, the A* - C pass rate in English dropped to 26.9 per cent from 35.1 per cent the previous year, while in maths it went down from 35.8 per cent to 29.5 per cent.
31. Clearly the policy is not working. Students are not improving their literacy or numeracy by having to resit GCSE Maths and English. We know from our experiences with FE learners that having to retake subjects, again and again, that are taught and assessed in ways that are unsuitable for them is demoralising and demotivating: attendance at these lessons is often low.¹⁴ We therefore welcome the announcement that the Government is reviewing the effectiveness of this policy. **We fully endorse Ofsted's recommendation to implement an alternative level 2 qualification as a more appropriate means of improving a student's English and mathematics and ensuring that they are ready for work.**

¹⁰ BIS, Education, Skill and productivity: commissioned research, 2015

¹¹ Ofsted, Annual Report, 2016 pg. 22

¹² IBID, pg. 78

¹³ IBID, pg. 73

¹⁴ IBID, pg. 78

32. Often, the alternative level 2 qualification takes the form of functional skills. Currently, functional skills are the most widely used non-GCSE qualification, representing 7% of all regulated qualifications in England.¹⁵ However, they are not universally popular. Some learners benefit from functional skills (FS), particularly apprentices who value the way they are taught Maths in the context of their apprenticeship. Others, however, dislike the narrow approach of FS. Moreover, functional skills has a serious brand problem, where it is seen to be solely for those who are less “intelligent” or less “academic”. This often means that they are not widely recognised or valued by employers.
33. We therefore look forward to the results of the Education Endowment Foundation’s investigation into what works for teaching and learning in English and Maths for disadvantaged students. We hope that the results will contribute towards the creation of a new qualification that holds the same recognition and prestige as GCSEs, but works to properly support learners of all ages to achieve their basic skills.
34. **NUS also believe that in order to improve basic skills the government must reverse the cuts to ESOL and instead deliver a sustainable public funding settlement for ESOL provision.** In 2008 the Government spent £230 million on ESOL; this had reduced to £90 million in 2015. However, as the Casey Review found, there is a clear link between the level of English spoken and the level of qualifications attained by a non-native English speaker, and also between levels of English and employment rates and labour market capabilities.¹⁶ Investing in ESOL is a low-cost step towards improving basic skills, employability and strong communities.

Transition year

35. *The vital component of ensuring that the transition year is a success is to centre the needs and wants of learners in any discussion or decision that is made about it. In order to succeed the transition year has to truly reflect what learners need. It has to be tailored to them individually and learners have to feel supported and empowered to help shape it. Our experiences with further education learners have demonstrated the importance of learner voice and the need for students to be actively involved in their education. Allowing students to act as co-creators in their transition year is likely to lead to more engaged students; engagement can promote a sense of belonging, which can be critical to student retention and success.*¹⁷
36. **Following initial consultation with learners on the transition year, NUS believe there are some key features that they are clear need to be included in the year:**
- a. Provision for resits
 - b. The opportunity to gain other qualifications
 - c. Work experience
 - d. Community work or Voluntary Work
 - e. Quality, impartial careers information, advice and guidance that is provided by a professional careers advisor.
 - f. Basic Skills training – employability, digital
 - g. Sex and Relationship Education
 - h. Political Education
 - i. Mental health support – confidence building.

¹⁵ Education and Training Foundation, Making maths and English work for all, 2015

¹⁶ The Casey Review, 2016

¹⁷ NUS, UUK and BIS, Building a Framework for Partnership with Students

Careers and the transition year

37. It is important that the transition year offers students choice and flexibility. It should give them the opportunity to consider a whole range of different careers, jobs, qualifications and routes, both academic and technical.
38. The quality of Careers Information, Advice and Guidance (CIAG) provision learners receive before reaching the age of 16, however, is still very poor and often very biased. A recent report by the Edge Foundation and City & Guilds found that just 1% of students in FE said careers advice at school had been the most important factor in their choice to study in the sector,¹⁸ whilst research undertaken by the AoC found that 70% of learners turn to their parents for careers advice.¹⁹
39. As such, the transition year, alongside the long awaited careers strategy, should look to change this. Indeed, we broadly welcome the purpose of the transition year to take a detailed look at careers.
40. However, we would strongly caution against structuring the transition year around “developing achievable career plans and the skills needed for them”. Research conducted by NUS found that 68 per cent of students think that 16 is too early to be making choices which will define their future career path and so the transition year should aim to broaden opportunities and choices for learners, not look to narrow their skill set at such a young age.²⁰
41. Moreover, given that the world of work is changing rapidly and we are seeing an incredible rise in flexible arrangements and tech-based work, it seems counterintuitive and regressive to look to develop skills for one particular type of career. Rather, the transition year should seek to code within the curriculum of the year the broader definition of basic skills discussed earlier and integrate it into the teaching of the year.

The aims of the transition year and youth work

42. It is clear that the ambitions of the transition year – those of citizenship, resilience, health, employment and personal development – speak directly to the youth work profession and sector. As such, **NUS believes that a key component of ensuring the transition year is a success is for the Government to encourage and support youth services to play an important role in the year.**
43. Youth work is a sector that is often undervalued and underfunded, but it is an incredibly important one. Youth work has enormous behavioural, academic, psychological and economic benefits and this has been demonstrated in a report by UNITE. UNITE found that one of the benefits of youth work in college was to improve and extend opportunities for learning for all students, as well as providing more specific support for those young people struggling in formal education.²¹ A report by the Joseph Rowntree Foundation recommended that “The Youth Service must be included in re-engaging young people encountering significant problems in education, as a response to the preventing or mitigating social exclusion.”²²

¹⁸ Edge Foundation and City & Guilds, Longitudinal Study of Learners in Vocational Education Wave 1 Report, 2016

¹⁹ NUS, When IAG Grow Up, 2014

²⁰ NUS, When IAG Grow Up, 2014

²¹ UNITE, The benefits of youth work, 2010

²² IBID

44. The youth work sector clearly has an important role to play in the transition year. For it to do so requires substantial investment from the Government, but the impact that youth work has on learners clearly aligns with the ambition of the transition year to ensure that “no-one drops out of education at the age of 16.”²³ **We recommend that any youth work that is commissioned must be carried out or supported by qualified practitioners.**

Funding for the transition year

45. In order for the transition year to be a success it is clear that there will need to be adequate funding in place to support students. Currently students in Ireland have the option to undertake a transition year. Research by the Irish Second-Level Students’ Union found that the majority of students surveyed found the year to be expensive.²⁴ Students in Ireland are asked to contribute towards the transition year and this varied from school to school from €150 to €900, with the average being €300. However, students found that although their school had declared that the contribution fund would include trip expenses and all other expenses covered for the year, they were often – sometimes on a weekly basis – asked to contribute more money.²⁵
46. **NUS strongly believe that this contribution model should not be adopted in England.** Whilst it is not yet clear who the transition year is intended for, the green paper makes vague reference to students who have “substantial basic skills gaps and are not ready for more advance study and employment” and also to students who need help “developing the skills to make them more employable.” It is likely that these lower level-students will have experienced socio-economic or other disadvantages. As such, they are likely to need financial support to properly engage in the year. **We recommend the Government introduces financial grants to support these learners and does not consider asking them to financially support a year that is designed to support them.**

Concerns with the year

47. Certainly, whilst we are broadly supportive of the principle of a transition year, especially if the above was integrated into it, there is still too little information about it. **As such, we believe that the Government must consider and answer these key questions in order to have any chance of making it a success.**
- Who will provide, monitor and fund the transition year? Are the Government expecting schools, colleges, careers services, other government or local authority bodies or a combination of them to do so?
 - Who is the transition year intended for? The green paper makes vague reference to students who have “substantial basic skills gaps and are not ready for more advance study and employment” but also to students who need help “developing the skills to make them more employable.” If the transition year is intended to solely support lower-level students, who have potentially experienced socio-economic or other disadvantages, then the branding of the year will be crucial, so as not to inadvertently disadvantage learners.

²³ Barnardos, Not Present Not Correct, 2010

²⁴ Irish Second-Level Students’ Union, Transition Year: Exploring the student experience, 2010

²⁵ IBID

- c. What are the success measures of the transition year? Will students need to “pass” the year in order to move onto one of the 15 routes or skilled employment? Will students receive any qualifications at the end? What happens if they are unable to move beyond a level 2? **NUS would recommend that the year is learning led and as such students shouldn’t need to “pass” to move onto level 3. However, learners should be given the option to acquire other qualifications, if they so wish.**
- d. How will the transition year affect student status and funding? If a student is within the “transition year” for longer, but progresses onto one of the 15 routes, will they then be liable to pay for their final year of technical education, as per the current funding model?

48. There is clearly much more work to be done around the transition year and as such NUS would recommend the Government commissions additional work into the design and content of the year. Central to this should be further consultation with learners who would be likely to undertake a transition year, as well as consulting with specialist further education providers. Any additional work should be completed before the first routes are introduced in September 2019.

11. Do you agree with the different elements of the vision for the new technical education system set out here?

2a. Clear, high quality routes for technical education

- 49. We broadly agree with the need for clear, high quality routes for technical education as laid out in the strategy and the principles of the Post 16 Skills plan. However, we have some concerns about the 15 core technical routes and their application.
- 50. The 15 routes do not currently consider substantial and prolonged provision for learners at pre-entry level, level 1 and 2. Moreover, learners with special educational needs or learners who are taught in specialist provision are seemingly not considered at all. Whilst the transition year appears to recognise that not every learner will be able to enter one of the routes at level 3 immediately after school, it does suggest that at some stage every learner will be able to. We know that this is not the case: in the UK in 2015 there were 212,000 young people studying at level 2 with a further 65,000 studying at level 1 or below.²⁶ **These students deserve a quality, comprehensive education too and as such we would recommend the Government, in consultation with specialist providers, develop proposals that considers the provision of pre entry, levels 1 and 2 for these learners.**
- 51. The 15 routes miss out entire sectors that are not defined as “academic” or “technical”, most notably retail and performing arts. Currently, these sectors fall under an Applied General Qualification. Whilst we welcome the announcement that the Government will retain AGs, ensuring learners have access to the broadest possible choice of courses, we are disappointed that these sectors will not have their own technical route.
- 52. Similar concerns around choice for students are raised when one considers the assertion in the Skills Plan that “it will be for local areas to decide which routes they should focus on in order to meet the demands of the local economy.”²⁷ This appears

²⁶ NCFE and the Campaign for Learning, Why should it work this time?, 2017

²⁷ Post-16 Skills Plan, 2016. Pg. 33

to be in the interests of employers and the local economy. It is clearly not in the best interests of students as their choices will be severely limited; the concerns highlighted previously in this response about the lack of student demand at specialist UTCs ought to be considered here. Moreover, studies have shown that students are more likely to leave college early if they are placed on the wrong course and limiting the options available to students would potentially see a rise in the number of course drop outs as a result.²⁸

53. We agree that a “high performing technical education system needs a clear, simple framework of high standard qualifications”, **but we believe that the Government’s current proposals to reform technical qualifications could have a seriously adverse effect on quality.** The Skills Plan makes reference to a licensing approach whereby “Any technical education qualification at levels 2 and 3 should be offered and awarded by a single body or consortium, under a licence covering a fixed period of time following an open competition.” This approach, however, was rejected for the academic route in 2012 by the Education Select Committee, who saw that a single board would lead to a “a lack of incentive to innovate, the risk of higher fees and of reduced quality of service.”²⁹ **NUS strongly recommend the Government abandon this proposal.**

Accessibility of the 15 routes

54. The assertion in the strategy that students will be able to progress on “the routes either through an apprenticeship or college-based provision” has the potential to create a two tiered system in further education where learners from more deprived backgrounds are forced to take up a paid apprenticeship, whilst those with more financial capital are able to undertake an unpaid college course.
55. We know that further education learners are more likely to come from lower socio-economic backgrounds. One report found that in the last ten years, the proportion of learners participating in FE and skills has increased in the most deprived areas.³⁰ There is then, perhaps, a strong possibility that many learners would opt for an apprenticeship over a college course; the option of earning a small wage seemingly a more attractive offer than getting into debt. Whilst apprenticeships are an important part of social mobility, they cannot be the only option for students from low socio-economic backgrounds. That is not social justice. Further education courses themselves are an important part of social mobility and an education has to be broader than preparing someone for work. If the Government is truly committed to a social mobility agenda then serious consideration needs to be given to the financial support package of learners who are studying at college – and, indeed, on apprenticeships. Learners should not be financially penalised for undertaking a college course and they should be able to choose the route that is most right for them and their future aspirations, not their bank balance.

Employers within the 15 routes

56. We are concerned about the power given to employers within the routes, particularly with regards to their role in designing the curriculum. We would strongly advise against the approach suggested in the Institute for Apprenticeships draft operation plan that implied qualifications would be designed “by considering what is needed to move into skilled employment and then working backwards to develop the qualifications which lead to this point.” We are convinced that this is a highly

²⁸ Martinez, Improving student retention and achievement, 1998

²⁹ Education Select Committee, The administration of examination for 15-19 year olds, 2012

³⁰ BIS, The contribution of Further Education and Skill to Social Mobility, 2015

inappropriate and dangerous method of developing qualifications, not least because in the current economic and technological climate the needs of employers are constantly changing, which could render qualifications quickly outdated.

57. **With this in mind NUS strongly recommend the creation of learner panels that sit alongside the employer panels to co-lead on the design of standards and assessment plans.** We would also expect clear reassurances that standards and assessment plans will be developed with experts in qualifications and teaching who understand the needs of learners, and not just employers.

Work Placements

58. We strongly welcome the introduction of high quality, 12 week work placements for learners in a technical education route. Work placements are a vital component of good career guidance and experience of the workplace is one of the Gatsby Benchmarks, which we endorse. Recent undertaken by NUS on learner's experiences of work experience also found that 79% agreed or strongly agreed that their work experience was a worthwhile thing to have done and 72% were proud of what they had achieved on their work experience.³¹
59. However, steps must be taken to ensure the high quality provision of work placements that relate to a student's course. As such, we would expect the common principles of high quality work experience, as defined by the DfE in the Departmental advice on Post-16 work experience to be made a statutory requirement of any work placement.³²
60. Furthermore, funding must be in place to support learners who may have financial difficulties in terms of getting to and from their work place. Our research found that 61% of learners did not receive any financial support during their work placement.³³ No student should have to make a decision on where they would like to undertake their work placement because of financial reasons and in each instance this would greatly disadvantage poorer students. **As such, we recommend that grants are available to learners to support their travel costs to and from work placements.**
61. Moreover, we recognise there are likely to be substantial issues for colleges in terms of the delivery of the placements. As such the Government must work to ensure that the emphasis for the provision of work placements is on the employer, not the college. It must also ensure that adequate funding is provided for the extra college staff time that will be required to administer the work placements.

2b. High Quality Technical Education providers with excellent teaching

62. We welcome the focus in the strategy on high quality technical education providers with high quality teaching, particularly the assertion of the need for "excellent teachers who have a strong industry background and high-level specialist and technical knowledge". At the area review roundtables that NUS ran with student representatives from over 120 FE colleges, the dual specialism of technical teachers was consistently referred to by learners as being an important component of high-quality education.

³¹ NUS, Work Experience Research, forthcoming

³² DfE, Post-16 work experience as a part of 16 to 19 study programmed and traineeships: departmental advice, 2015

³³ NUS, Work Experience Research, unpublished.

63. At these roundtables we also discovered that for learners high quality education goes beyond typical measures of success as seen by regulators and funders. Indeed, success can be understood in terms of students' integration into a community, increased self-confidence, understanding of wider society and basic 'human-skills'. Learners expect their education to continue to build and champion the development of wider skills beyond the industry or course in which they study.
64. As such, any discussion of quality must ensure that the voice of learners is given equal, if not more, weight than the voice of employers. **We strongly recommend that learner panels are established that sit alongside the employer panels and co-lead on the design of standards and assessment plans. We would also recommend the Government ensures that all providers develop a strategic learner engagement strategy, which outlines how the education provision at the institution is developed in partnership with learners, ensuring it meets their needs.**

2c. Higher level technical education and new Institutes of Technology in all areas.

Institutes of Technology

65. At this stage we are unable to offer our full support for the creation of Institutes of Technology. Whilst we believe the focus on improving Higher Level Technical Education is timely and welcome, the limited information available on Institutes of Technology is a cause for concern.
66. The Government has promised to set aside £170 million of capital funding for Institutes of Technology. **We believe that this money would be much better invested into the provision of technical education at every FE provider and not just a prestigious few.** This is particularly important when considering that it has yet to be established who will actually study at Institutes of Technology. Indeed, there are serious questions and concerns around the demand for, and viability of, Institutes of Technology.
67. Institutes of Technology are designed to provide specialist provision for higher level technical education at levels 4 – 5. Advance Learner Loans and the introduction of maintenance loans at Institutes of Technology have created a system of financial support comparable to that in Higher Education, signalling the Government's intent to make higher level technical education more accessible, a notion which we would welcome. The key issue here is that it is very unclear as to who exactly Institutes of Technology are intended for.

Viability of student demand

68. Within the context of the reforms proposed in the Post-16 Skills Plan, Institutes of Technology appear to be a bit of anomaly. For many students aged 18/19 who have just finished one of the 15 routes, progression onto a STEM subject at a sub-degree level is not likely to be in their best interests. The proposed bridging provision allows them to continue to degree level with their qualification and in both case each option would require the student to take on debt to help with their living costs. At this stage, it is hard to see why many young people would chose to invest in a sub-degree level qualification at an IoT.
69. Whilst Institutes of Technology are intended to be in every region, there is no guarantee that a student's local IoT will run the subject they want to study.

Certainly, whilst the regional economic focus appears to solve an employer's problems, it does not necessarily follow that there will be the demand from students. It is therefore likely that for a considerably large proportion of students in the local area, the Institute of Technology will not provide the course they want to study. As such, they may have to move to study at another IoT or HEI if they can afford to, or they will look at Higher Level Provision in another college.

70. Indeed, the importance of planning around the demand from learners, not just employers, can be demonstrated by the repeated failures of University Technical Colleges (UTCs). University Technical Colleges, like IoTs, are focused on providing specialist technical education. However, University Technical Colleges have consistently struggled to recruit students; a government report from 2015 found that not a single UTC was running at full capacity.³⁴
71. Given the above there is little reason to believe that a young, socially mobile student studying a STEM, or other technical subject would move from their local area and take on debt to cover their living costs to study at a sub-degree level, when they could as easily enter a HEI and gain a degree instead. Our research shows that graduates of Science, Technology, Engineering and Maths (STEM) subjects are statistically more likely to have chosen their subject in order to get a well-paid job likely than in other subjects. It therefore follows that these students would favour a STEM degree, over a STEM level 4 or 5.³⁵ Human capital theory suggests that an individual may accept the direct and indirect opportunity costs of further or higher education if they perceive the benefits will exceed those costs in the long run.³⁶ For these students, the benefits of studying at an Institute of Technology do not outweigh the costs.
72. If, however, Institutes of Technology are intended for students from more disadvantaged backgrounds then there are several important things to consider. Firstly, there is a significant body of work demonstrating that students from poorer backgrounds are more debt averse.³⁷ This debt aversion could articulate with other factors to reduce the potential uptake of courses at Institutes of Technology from this cohort. Indeed providing support only via loans may increase participation as compared to no support at all; but we would expect that participation could be increased still further if grant funding was provided in addition to loans, and indeed research from the Institute for Education has shown that providing grants in higher education had a positive impact on participation, with a £1,000 increase in grants increasing participation by 3.95%.³⁸
73. As before, it is likely that a regional Institute of Technology will not offer the course a student might like to take up. However, we know that students from poorer backgrounds employ various strategies to reduce their debts, including studying from home – making a move to another region to study at an Institute very unlikely.³⁹ Similarly, some students will be unable to move away to take up these courses because of family or caring responsibilities, disability or other reasons.

³⁴ House of Commons Briefing Paper, University Technical Colleges, 2017

³⁵ NUS, Debt in the First Degree, 2015

³⁶ Becker, Human Capital Theory

³⁷ Patiniotis & Holdsworth, 'Seize That Chance!' Leaving Home and Transitions to Higher Education, 2007

³⁸ Dearden, Money for nothing: Estimating the impact of student aid on participation in higher education, 2014

³⁹ Patiniotis & Holdsworth, 'Seize That Chance!' Leaving Home and Transitions to Higher Education, 2007

74. Therefore, it is very concerning that the introduction of maintenance loans will only be available for those studying at Institutes of Technology. The current proposals around maintenance loans run the risk of creating a two-tiered system that replicates similar access issues to those currently in Higher Education. Poorer, more disadvantaged students will be unable to access the courses they want to study at 'prestigious' institutions and could potentially be locked out of Higher Level Technical Education altogether. As such, **NUS would strongly recommend maintenance loans are available at higher level technical for all courses and qualifications delivered across the sector. NUS also believe that all FE qualifications should be supported adequately and the Government should consider how it can support FE learners across all levels of education.**
75. Another anomaly that the Government has to consider with regards to higher level technical education is that students from disadvantaged backgrounds may well receive more financial support if they attend an HEI.
76. We know that if a student does not have sufficient financial resources in the here and now to pay for course and living costs, this will prevent them taking up a course. As such, Higher Level Technical Education learners must have the same access to funding support as those studying at Higher Education – both in terms of the amount of their maintenance loan but also access to other forms of financial support. As it currently stands students in Higher Education are also able to access a number of supplementary support for dependants (the Adult Dependant's Grant, the Childcare Grant and the Parents' Learning Allowance) and if they are disabled (the Disabled Students' Allowance). Those aged up to 20 can receive Care to Learn support for childcare costs and this should remain the case, **but given that the financial barriers for other learners with adult or child dependants and those of any age who are disabled, it will be absolutely critical to ensure equality of access to these grants.**
77. Finally, if the Institutes of Technology are not meant for young people, but instead for adults in work then there are similar concerns around the demand and viability of IoTs. As a report by the Campaign for Learning and NCFE states, part-time sub-degree provision is 'precisely the area where there has been the most dramatic and sustained fall in HE enrolments in recent years. Qualification reform and the involvement of employers through the development of Foundation Degrees has done little to stem the fall in such provision in HEIs and, despite increasing policy support, the delivery of such work in FE colleges has failed to increase.'⁴⁰

2d. Ensuring Technical Education routes are demanding

78. We welcome the announcement made by the Chancellor of the Exchequer in the Spring Budget that Further Education would receive an investment of £500 million per year in 2020 for an extra 900 hours of teaching. We are however concerned about the impact this may have on teaching staff and quality, so we look forward to the response from organisations such as UCU and Unison.
79. We are also concerned by some of the language used within the green paper to describe further education, particularly the assertion that "technical education for those not pursuing the academic path has fallen behind". Whilst we recognise, and welcome, the Government's ambition to achieve parity of esteem between technical and academic education, we would strongly warn against the temptation to compare the provision, assessment and outcomes of the two. We agree that it is vital that

⁴⁰ NCFE and the Campaign for Learning, Why should it work this time?, 2017, pg. 16

technical education is seen as a respected alternative to an academic route. However, there has to be a recognition that technical education provides learners with different skills, knowledge and attributes to academic education – the two are not comparable, nor should they be.

80. A BIS report from 2015 concluded that there are “strong and consistent economic and non-economic benefits associated with undertaking further education and skills”, highlighting that whilst “learners economic outcomes improve as a result of learning”, the analysis “suggests that non-economic benefits are significant and in excess of the economic (and more quantifiable) benefits.”⁴¹ These elements are what the core of this ambition has to be centred on: improving the awareness of the benefits of technical education and emphasising the intrinsic value it already holds to the economy, to the individual and to society itself. It cannot be focused on changing technical education so that it fits society’s perception of what ‘prestigious’ education should and shouldn’t look like.
81. We would be incredibly concerned if the ambition of achieving parity of esteem with academic routes means that particular groups of learners are inadvertently excluded from partaking and achieving in technical education.
82. Moreover, the language of ensuring that the routes are “demanding” and challenging not only does a disservice to current learners in further education, it also runs the serious risk of excluding SEND learners, as well as lower achieving learners. We would like to see clear and unambiguous reassurances that the reforms to technical education will adequately consider the impact on these learners.

12. How can we make the application process for further education colleges and apprenticeships clearer and simple, drawing lesson from the higher education sector?

83. **NUS believes that quality, impartial IAG has to be a central component of any new application process for FE students.** We recognise that the Minister will be releasing a careers strategy imminently, but it is vital that the strategy is not seen as separate to this process. Clear and concise IAG must be in place: both before learners apply and at every step of the application process. Without better supporting students to consider all options before and during the point of application, there is a risk that little will change: students will just keep applying for what they did beforehand and the number of students dropping out of courses will not decrease.
84. **We strongly believe that any application process must not include a cost for students. Currently students applying for further education do not need to pay for their application and we would strongly recommend that this continues.**
85. **We also believe that any application process should not include a ‘clearing process’, like there currently is in Higher Education.** We know that for students applying to university ‘clearing’ can be chaotic, stressful and hard to navigate. It is not always conducive to making the right decision about where to study and it is not something that should be included within this process. We also would have big questions about how it would work in practice as FE students, by their very nature, are most likely to apply for courses and colleges that are local to them. It is not as simple as going to another college they had not necessarily considered in a place they are not from.

⁴¹ BIS, The contribution of Further Education and Skills to Social Mobility, 2015

86. We look forward to our continued work with the DfE to ensure that any future FE application process works in the best interests of further education students and apprentices.

12. How can we enable and encourage people to retrain and upskill throughout their working lives, particularly in places where industries are changing or declining?

87. NUS believe that in order to encourage people to retrain and upskill throughout their working lives, the following principles must be considered:

- a. Financial security
- b. Job security
- c. Training should be offered when employed
- d. Training should be tailored towards individual needs
- e. Cost shouldn't be a barrier – people should receive financial support to undertake the training.

88. NUS support the recommendations to encourage people to retrain and upskill throughout their working lives made by the Skills Commission in their report "Spotlight: Older Workers." We also look forward to the responses from organisations like the Learning and Work Institute.

Contact

NUS would be happy to discuss any aspect of this consultation further. In the first instance please contact:

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