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HEFCE - HE in FE Consultation: a response from Edexcel

Details

Name	Ian Fleming
Position	HE Manager
Type of organisation	Awarding Body
Organisation	Edexcel
Address	One90 High Holborn London WC1V 7BH

Introductory Comments

While it is traditional to welcome opportunities to respond to consultations, this particular consultation is especially welcome, for three reasons. Firstly, because of the growing recognition of the importance of Level 4 +provision; secondly, because of the current disjointed state of provision at this level, one aptly described in the opening section of this consultation; thirdly, because of the new imperatives around Level 4 + provision, also signalled in the opening section of this Paper, and including, in particular, the Leitch Review and the Further Education and Training Bill.

Our overall view is, therefore, to welcome this attempt to clarify the nature, purpose and funding of HE in FE, but it is tempered by two concerns.

Firstly, that, despite what might emerge from this consultation, there remains a wider societal issue about how HE in FE is perceived. To some extent this issue is being played out in the current debates around the proposal to grant FE colleges Foundation Degree awarding powers, where appropriate. The worry is that the distinctive role for HE in FE, identified in this consultation, which focuses on meeting local skill needs and widening participation, simply reinforces, rather than challenges, existing presumptions about the worth of such provision. That said, this is not an easy issue and one that either HE or FE on its own can resolve. In our view, the distinctive nature of such provision identified in this Paper is right, but to leave it at that will be insufficient; it will need Government and employers in particular to promote, perhaps as part of the Leitch response, the value and worth of qualifications at this level, so that such distinctive characteristics become valued.

Secondly, and as a follow on, those distinctive characteristics would be enhanced if the two primary forms of qualification at this level, Foundation Degrees and HND/HNCs were encouraged to accommodate, rather than compete. The recent HEFCE Statistical Paper on the first six years of Foundation Degrees indicates that, while the sub degree market is fragile, these two qualifications serve important market needs. It is reassuring that this consultation recognises the value of HND/HNCs as part of the totality of offer at this level and our view, not unnaturally, is that the market is better served by having clearly endorsed choices for learners, rather than allowing for drift and confusion.

Responses to Specific Questions

Consultation Question 1 (30-36) We fully agree that FECs have a distinctive and unique role in the delivery of HE and support a flexible and responsive funding regime. We broadly support the comments on FECs and HE provision and concur with Consultation Question 1. Point 38 (e) does, however, beg the question about how FECs can realistically ensure that their HE offers *"a high quality learning experience, supported by scholarship..."* We would simply add after "learning experience" the phrase 'as recognised through QAA's IQER process' and leave out the rest of the sentence. That is the practical reality rather than the abstract ideal. We also draw attention to the work on the HE Experience in FECs currently being undertaken by the HE Academy.

Consultation Question 2 (39-49) We agree that there is a danger of opportunistic development of HE provision in FECs without a coherent overall strategy. It is a realistic expectation that colleges should develop and publish HE Strategies and we fully support the suggested themes set out in Para 44 (a-f) Our view is that centres should work closely with their awarding HE partners (ie, either Edexcel or HEIs), when developing Strategies. This will build upon the ethos of the new QAA review method for HE in FE, IQER, which is being piloted in 2006/7.

We believe that the concept of a "strategic policy commitment" rather than a detailed business plan is right particularly in the context of a post Leitch shift away from central planning and towards demand led and funded provision. In that regard it would be helpful to include in the features listed some recognition of the importance of employer led funding as indicated in the latest Grant Letter. Given that the Letter is peppered with such phrases as "radical approaches" and "sustained (work based) growth" this is clearly an important policy driver for HE in the future and one in which FE is particularly well equipped to meet.

Consultation Question 3 (52-56) We support the proposed aims and objectives for Centres for HE Excellence in FECs although we believe the first three could be assimilated into one. Also we believe there could be a stronger focus on good practice in teaching, learning and assessment?

Consultation Question 4 (57-61) We agree with the proposals on the criteria for selection of CsfEE. However we do have a couple of concerns. One is that colleges with a substantial amount of non prescribed HE provision will be treated under the selection process? The other is how helpful it is to link invitations to bid to the submission of HE strategies; this would not seem to allow for institutions to develop an expertise over time. Perhaps a proportion of funding for such purposes could be retained for 'late developers'?

Consultation Question 5 (62-78) We fully support the proposal that indirect funding arrangements should be secure for three years; this should provide some stability. We recognise that HEFCE has an interest in moving away from direct funding for FECs and recognise that indirect funding may often be more appropriate in the case of smaller colleges. However, direct funding does enable an FEC to take more independent control of its HE provision, (whilst still within the constraints of HEI validation, where appropriate), and we would prefer not to see an overall increase in indirect funding as a proportion of the total HEFCE funding received by FECs without further consultation.

Consultation Questions 6 and 7 (79-81) The proposal on developing cost data on teaching seems reasonable. We believe that identifying the costs rather than specifying the proportions is the correct way forward but needs clear guidance to avoid undue complexity or the insertion of hidden costs.

Consultation Questions 8 and 9 (82-92) The points raised in Para 84 are significant, although the statement seems to make the assumption that FECs will be driven to use HEI validation arrangements in order to establish HE programmes. This is not, of course, correct in the case of Edexcel approved Higher National programmes (or a considerable potential proportion of non prescribed HE). Equally of course the current FET Bill may lead to some changes in relationships.

We would support the development of Consortium arrangements and fully agree with the comment in Para 88, relating to FEC-HEI relationships, that: *“consortia do not present the potential problem of a differential in power relationships in such sharp contrast as might be the case in a franchise relationship.”*

We therefore welcome the proposal that indirect funding relationships should reflect the arrangements and code of practice for consortia. Our slight concern at this point is how far the emphasis on consortia led provision is appropriate in the light of more competitive demand led provision. In effect is the nature of such provision changing and should not this be recognised in this consultation?

Consultation Questions 10 and 11 (93-97) We welcome the proposal for a formal monitoring process for indirect funding arrangements. As the consultation indicates the most effective mechanism for ensuring compliance is withdrawal of funding. A second will be the fact that a provider with a poor quality profile will not be able to compete effectively for business as one with a strong quality reputation.

Consultation Question 12 (98-103) We agree that there is some confusion among FECs about the applicability of HEFCE special funding initiatives and welcome the proposal to create a fund for large capital projects in FECs.

Consultation Question 13 (104-111) The comments on IQER are noted. We support this new QAA review method and are fully involved with the IQER Pilot in 2006/7, which includes 13 colleges offering Edexcel directly funded HN programmes. We are particularly pleased that HEFCE has decided to facilitate a full evaluation of the pilot before roll out of the method in January 2008.