

# Response to the public consultation on the approval of level 3 technical qualifications

A framework of technical qualification categories for IfATE approval, and our proposed approach to approving level 3 technical qualifications

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## Foreword

The Institute for Apprenticeships and Technical Education (IfATE) is a leading partner in the improvement of post-16 technical education, including driving up the quality of apprenticeships, rolling out new T Levels and approving Higher Technical Qualifications. Our focus is now turning to technical qualifications at level 3 and below for students in England who are 16 and over. We believe that a strong technical education offer will form the cornerstone for developing the skilled workers needed to achieve future economic growth, playing an essential role in the governments vision to boost growth through increased productivity and labour supply.

The Department for Education (DfE) has set a clear direction for streamlining the range and raising the quality of technical qualifications. We will take responsibility for approving technical qualifications that are based on the needs of employers and present opportunities for people to enter skilled employment or further their careers. Technical qualifications will only be eligible to be considered for funding if they are IfATE approved.

It is essential that employers influence the design of technical qualifications and apprenticeships to ensure these products equip students for the skilled jobs employers offer. Our cornerstone approach to ensuring our products meet employers' needs is through 'occupational standards', which are designed by employers and set out the knowledge, skills and behaviours needed in an occupation. It is the government and IfATE's shared ambition that post-16 technical education and training will be aligned to employer-led occupational standards by 2030 and we are committed to achieving this.

Our recent consultation sought views on our approach to the approval of technical qualifications using the new powers we have been granted through the [Skills and Post-16 Education Act 2022](#). We have worked closely with Ofqual and DfE to ensure our new approval process works alongside Ofqual regulation and DfE funding processes as part of an integrated approvals process.

We also set out ambitious plans to introduce an 'employer strategic steer'. Through this steer, IfATE will bring together a variety of qualitative and quantitative insights, supplying these to awarding bodies to assist them in developing products that are truly demanded by employers. In time, this guidance will become a common reference point for the awarding sector, providing guidance on how best to shape their technical product offers.

Having considered the responses provided by a variety of stakeholders during the consultation period, we have now finalised our intended approach to technical qualification approvals. These responses, and the decisions informed by them, will be addressed in turn within this document, with the outcomes also reflected within our approval criteria.

## Executive summary

With the passing of the Skills and Post-16 Education Act, IfATE will now take the lead in the approval of a broader range of technical qualifications. The powers enable IfATE to play a central role in delivering on the vision of a simplified, streamlined, technical qualification landscape, as set out in the DfE's 2019 [‘case for change’](#).

The proposals set out within our recent technical consultation were formulated with the goal of enabling us to reduce the current complexity of the qualifications landscape at level 3 and below – establishing a clear set of employer recognised options to support students to choose the right qualifications for their future careers and address employer skills needs.

Our intention is to provide a strategic steer to the awarding sector via IfATE issued employer strategic guidance. This guidance will allow us to disseminate key information about employer needs to awarding bodies at the outset of their development cycles. It is expected that this product will be a valuable source of information for awarding bodies, assisting them in shaping their technical education offer, and respondents agreed on the value of this steer.

Some qualifications will need to offer specialist content which builds on core occupations, or will be important across various occupations. We proposed to publish pre-defined lists of such areas to help awarding organisations in developing qualifications and this approach was supported by respondents. We advised consultees on the use of a pre-defined list, to be published by IfATE, which would be used to inform applicants of the specific areas (and associated duties) we would expect them to align their offers to, as well as introducing an exception process. The combination of these two processes will ensure that we maintain consistency amongst offers, to promote clarity, whilst also allowing the market to remain agile to skills needs identified by awarding bodies. We will strive for links to occupational standards whenever possible, even if this means developing a new standard.

Employer demand is paramount in establishing a system in which students can be assured that a technical qualification will deliver the positive employment outcomes they seek. We considered responses and used consultee insights to refine our employer demand test criteria; ensuring that all applicants will have clarity on the criteria they must meet. SMEs were highlighted by consultees as a key group for awarding bodies to source input from, ensuring this group of employer's needs are factored into the development and validation of materials. We agree on the importance of ensuring that the needs of SMEs are properly reflected through reformed technical offers, and we have therefore included additional criteria requiring awarding bodies to rationalise their approach to engagement; including how they have sourced feedback from a representative range of employers. To ensure the criteria offer balance, we have also sought to broaden the evidence base available to awarding bodies, ensuring they can adopt an approach to evidencing demand which is most suitable to their individual circumstances.

Over half of respondents advised they were clear on our intentions for testing the relevance of qualification content. As with the employer demand test, however, we have ensured that feedback from consultees has been factored into further refinement of criteria and we will provide comprehensive guidance for all applicants.

Due to the breadth of occupational areas in scope, and the diversity of assessment approaches that may be most valid across occupations, we laid out in the consultation our preference to allow flexibility for awarding bodies when developing their assessment offer. Broadly, consultees were positive about this approach, with the only clear concerns relating to the clarity of guidance which underpins this flexibility. We have taken on board feedback and have sought to provide additional clarity within our assessment guidance to support applicants in developing their offer. Some respondents asked us what was meant by the term 'high-quality' - we have removed this phrase from materials, with any references to quality now being fully substantiated to provide clarity.

Whilst ensuring quality within products is essential to their success, the ease with which this quality is communicated to the market is, in some cases, equally important. To support communication to the market, we set out three proposals around titling and qualification materials. Having considered responses, we will carry forward our proposals relating to accurate titling and the need for awarding bodies to publish details of their qualifications mapping to occupational standards. We intend to conduct further exploration of how best to leverage the IfATE brand in the promotion of technical qualifications, but do not intend to mandate it within titling at this time.

IfATE is passionate about Equity, Diversity and Inclusion (EDI), alongside sustainability initiatives and the emergence of additional digitalisation of work. These are key areas of focus for IfATE as we look to ensure approved products are future ready. We were pleased to see agreement in responses as to the need, and desire, to embed sustainability and digital into the future technical education curriculum. We will continue to make sustainability and digital frameworks available for use by the market, as well as, in time, releasing our EDI framework to be utilised in the development of technical products.

# 1. Our decisions

QUESTION	DECISION
<p>Question 3.1: What current barriers do employers face when looking to utilise technical qualifications for workforce development and/or recruitment?</p>	<p>We will publish our approval criteria and guidance which will support stakeholders in navigating the landscape. We also intend to undertake additional stakeholder engagements and general communications which will assist employers in understanding the technical education landscape.</p>
<p>Question 3.2: We plan to provide guidance to awarding bodies to help them with the shaping of their development priorities/approaches. This guidance would be developed by employers. Do you agree that this would be helpful?</p>	<p>We will publish strategic guidance which focuses primarily on labour market trends, skills shortages and rising skills demands. We will also seek to include additional information, sourced from employers, which directly relates to aspects of qualification design and presentation.</p>
<p>Question 3.3: What information would it be most useful to include within our employer strategic guidance to inform the development priorities/approaches of awarding bodies?</p>	<p>We will publish strategic guidance which focuses primarily on labour market trends, skills shortages and rising skills demands. We will also seek to include additional information, sourced from employers, which directly relates to aspects of qualification design and presentation.</p>
<p>Question 4.1: Are you clear as to where different types of qualifications will fit within the categories described?</p>	<p>We will publish additional explanations and examples alongside the finalised category framework. This will include clear definitions of each category, alongside its core aim and purpose statements. We will stagger the roll out of categories to ensure awarding bodies can develop familiarity with the criteria and process, prior to expanding our approvals to the full range of technical qualification categories.</p>

QUESTION	DECISION
<p>Question 4.2: We have set out our proposed approach for pre-defining additional specialist areas demand and cross-cutting functional areas against which awarding bodies can submit qualifications. do you foresee any issues with this approach?</p>	<p>We will publish a list of pre-defined areas and associated duties to inform awarding body developments in additional specialist areas for Cycle 1. For Cycle 2 of the reforms, we will publish further additional specialist areas, alongside cross cutting functional areas.</p>
<p>Question 4.3: Do you see a need for IfATE to introduce an exceptions process to allow awarding bodies to submit proposals for developments in the additional specialist and cross-cutting functional areas?</p>	<p>We will implement an exception process which allows awarding bodies to submit proposals to IfATE for qualification developments in the relevant categories. This will allow the system to be agile in addressing demand and recognises that the pre-defined list will not be exhaustive.</p>
<p>Question 5.1: Do you agree that the evidence requested is sufficient to assure IfATE of employer demand for submitted qualifications?</p>	<p>We will carry forward the principal evidence requirements detailed in the consultation for the Employer Demand Test. We will also ensure that the criteria which is to be met is suitably clear for applicants, including specific requirements relating to employer representation and the need to future proof qualification materials.</p>
<p>Question 5.2: Do you have access to any additional data / evidence which you feel IfATE should consider when assessing the employer demand for submitted qualifications?</p>	<p>The employer demand test will provide flexibility for applicants to provide a mix of qualitative and quantitative evidence. Applicants will be expected to rationalise their evidence submission, explaining to IfATE why they feel their approach to establishing employer demand provides suitable assurance. Applicants can draw on a range of evidence, supporting their direct engagement with reference to employer informed skills plans, such as LSIPs.</p>

QUESTION	DECISION
<p>Question 6.1: Is the proposed process clear for submissions into the employer proposed category?</p>	<p>We will introduce the described process for submissions into the employer proposed category. We believe that, where an occupation meets IfATE’s definition, it is only right that a standard should be developed. As such, where we do not identify a standard to which the proposed qualification may align, we will require the submission and approval of an occupational proposal prior to agreeing to a development in the employer proposed category.</p>
<p>Question 6.2: Are you clear as to our proposed criteria for testing content aligned to KSBs within occupational standards which are published by IfATE?</p>	<p>In line with the principles laid out in the consultation, we will publish criteria for testing content aligned to Knowledge, Skills and Behaviours (KSB) within our employer led occupational standards.</p>
<p>Question 6.3: Are you clear as to our proposed criteria for testing content aligned to pre-defined duties which are published by IfATE?</p>	<p>In line with the principles laid out in the consultation, we will publish criteria for testing content aligned to pre-defined duties.</p>
<p>Question 6.4: Are you clear as to our proposed criteria for testing content which does not align to any outcomes which are published by IfATE?</p>	<p>In line with the principles laid out in the consultation, we will publish criteria for testing ‘additional content’.</p>
<p>Question 7.1: Are the assessment design flexibilities allowed helpful to ensure differences between occupations can be reflected within assessments?</p>	<p>In line with the flexibilities laid out in the consultation, we will publish assessment criteria which allows awarding bodies the flexibility to develop assessments which reflect the needs of different occupations.</p>



QUESTION	DECISION
<p>Question 7.2: Is the guidance provided around assessment design sufficiently clear to facilitate the development of high-quality assessments?</p>	<p>In line with the principles laid out in the consultation, we will publish assessment guidance, alongside our criteria, which provides awarding bodies additional detail on IfATE's expectations for assessments, referencing Ofqual's requirements where appropriate.</p>
<p>Question 8.1: Do you agree with IfATE's proposed requirements relating to the accurate description of content in qualification titles?</p>	<p>In line with the principles laid out in the consultation, we will publish criteria and guidance for awarding bodies to follow when titling their technical qualifications.</p>
<p>Question 8.2: Would it be helpful to employers if the title of a qualification included confirmation of employer endorsement following approval by IfATE?</p>	<p>We will not take forward the requirement for a signal of IfATE approval to feature within technical qualification titles.</p>
<p>Question 8.3: Do you agree that the publication of KSB mapping in occupational entry qualification specifications is beneficial to employers and providers?</p>	<p>In line with the principles laid out in the consultation, we will publish guidance relating to the inclusion of KSB mapping within the specification documents of approved technical qualifications.</p>
<p>Question 9.1: If you are an awarding body, what EDI data do you currently collect for students who undertake your qualifications and would you be prepared, and able, to share it?</p>	<p>We will aim to provide, through our strategic guidance, information on potential sources of concern regarding EDI within route areas. We will not require awarding bodies to submit EDI data as part of our approval process. We will, however, publish further guidance in this area to inform development and delivery decisions.</p>

QUESTION	DECISION
Question 9.2: If you are an awarding body, how do you plan to embed our sustainability and digital skills frameworks in qualifications?	We will require, as part of qualification submissions, that applicants provide details of their approach to embedding sustainability and digital skills into their technical qualification. We will ask awarding bodies to explain this approach as part of the qualification submission form.

## 2. Consultation responses

### Question 3.1: What current barriers do employers face when looking to utilise technical qualifications for workforce development and/or recruitment?

**Consultation response:** Respondents reported that many qualifications lack meaningful practical assessment and are taught in a classroom environment despite the focus being on practical and technical occupations. This feedback reflects positively on the rationale for reform of technical skills and the intention to root technical qualifications in practical experience and assessment.

Efforts to address skills shortages are hampered by the lack of local delivery for key qualifications in certain geographical areas. Accessing funding was reported to be a barrier due to the complexity of the funding system, especially for Small Medium Enterprises (SME). Several comments expressed difficulties navigating a growing number of government reforms and skills programmes. There was a perception that these sometimes felt disjointed.

Employers fed back about the difficulties involved in releasing employees for study and training, especially when the qualifications were too large, too long, or inflexible. Equally, the sheer volume of qualifications available can be confusing and present barriers. The varying quality of technical qualifications, with many lacking proper employer or industry scrutiny, also leads to major barriers for employers. Some respondents raised the issue of older people returning to training and education. Some disagreed with the entry requirements for older people who may not have obtained formal qualifications or those who have developed skills through the workplace since leaving school. Furthermore, there may be some learners who had bad experiences in school who do not want to return to a school-like environment but would like to learn. Respondents also reported that occupational standards are not always as up to date as they need to be, the absence of shorter qualifications available to upskill or reskill learners aged 19 or over, and the pace of delivery being misaligned to business needs.

**IfATE response:** IfATE agrees that the lack of opportunity to gain practical experience and assessment of practice in many current qualifications is a barrier to occupational and workforce development. We note the strong correlation of this feedback with the primary objective of the technical skills reform agenda to make learning in technical areas more practice-based and genuine assessment of practice the norm.

IfATE recognises the need to ensure that the technical qualifications market is clear and accessible to employers. This need has shaped our work to date in creating an approval regime which delivers qualifications with clear aims and purposes that meet the needs of employers.

Placing occupational standards at the centre of the approvals process means employers can be confident that all qualifications approved by IfATE are aligned to their skills needs. Employers should also be assured that approved qualifications have been judged fit for purpose through a rigorous approval process designed around employer evidence/input. This process will act to reduce the variability in qualification quality, reported by some respondents as a major barrier to engagement with the system.

General navigability of the system and wider reform programmes was also raised by several respondents. IfATE is committed to ensuring that the reforms deliver clarity for employers. Guided by that aim, we have engaged widely with employers through our '[Big Conversation](#)'. This initiative ensures we are proactively talking and listening to stakeholders about the work IfATE does and the products we approve. We are also looking to serve employers better through the publication of bespoke information about their role in the post-16 qualification reforms and how, together, we can maximise the positive impact of these changes.

**Decision:** We will publish our approvals criteria, which highlights the central role that employers will play in the validation of qualifications. We will also be publishing criteria and guidance relating to qualification titling and materials which will support stakeholders in navigating the landscape. As detailed in our response, we are also undertaking additional stakeholder engagements and general communications which will assist employers in understanding the technical education landscape.

### **Question 3.2: We plan to provide guidance to awarding bodies to help them with the shaping of their development priorities/approaches. This guidance would be developed by employers. Do you agree that this would be helpful?**

**Consultation response:** 78% of respondents agreed that providing guidance to awarding bodies, developed by employers, would be helpful. Of the 12% who did not see the value, the majority felt there should be further clarity on the selection process for employers and what the guidance would be used for. Although most were supportive of the idea, those who said no voiced the opinion that many of the employers involved would be larger employers who do not have the same priorities, challenges and processes as the SMEs who may also want to utilise the qualifications. They saw a risk that it could have a negative impact on the sector if they did not take on the views of a range of stakeholders.

Employers cited their knowledge of the skillsets required by future employees. They also felt such guidance would help awarding bodies to better understand the operational issues faced by employers.

**IfATE response:** We are pleased to see that 78% of respondents acknowledged the likely benefit of IfATE strategic guidance to the awarding body sector. Using employer links, IfATE is uniquely placed to provide such guidance and we hope that it will be beneficial to awarding bodies in shaping their development priorities.

**Decision:** We will publish strategic guidance for awarding bodies alongside the publication of the approvals criteria for any routes in scope for an upcoming approval cycle. This guidance will provide further clarity to awarding bodies on the skills needs of employers. We will utilise our expanding collection of employer contacts to inform this guidance.

### **Question 3.3: What information would it be most useful to include within our employer strategic guidance to inform the development priorities/approaches of awarding bodies?**

**Consultation response:** Within the employer strategic guidance, respondents felt it would be most useful to include information on labour market trends, skills shortages and rising skills demands, and flexibility in relation to qualification assessment, units, sizes, hours, and levels. Furthermore, guidance on key themes such as sustainability, digital, and net zero would be welcomed, as would information relating to IfATE's priorities, operational issues faced by employers and a quality assurance framework. Awarding bodies felt that it would be beneficial for them to gain early insight into the emerging skills areas where employers are seeking talent. They would also benefit from further information on the issues faced by different sectors within their training and delivery, especially any barriers. This would support awarding bodies to prioritise the development of qualifications. In addition, awarding bodies felt that it should be clear whether the guidance is mandatory or optional to follow. Respondents wanted to see more information on which components of qualifications could be delivered practically in the workplace and which elements require classroom-based learning and assessment. This would make it easier to decide which qualifications would benefit their business. They also wanted to know which KSBs were most relevant and which were to be a priority in course delivery. Reference was also made to a desire to include facts and data surrounding skills gaps so awarding bodies could plan accordingly to train the upcoming workforce.

**IfATE response:** Several responses to this question raised the importance of IfATE using our employer strategic guidance to provide awarding bodies with details of labour market trends, skills shortages and rising skills demands. IfATE is uniquely placed to assist awarding bodies in these areas, harnessing our employer contacts to ensure that we help the sector make informed development decisions. In some cases, this may mean IfATE providing feedback from employers on the number of

qualifications currently available in the market and their demand for more or less options to be made available. Other responses included requests for further guidance around preferred assessment approaches, modularity, and the size/guided learning hours of qualifications. Through our approval criteria, IfATE has provided flexibility to awarding bodies in these areas. It is expected that they will use this flexibility, alongside their expertise and direct employer interactions, to develop qualifications appropriate to individual occupational areas and their customers' specific needs. We will however seek to engage with employers when considering individual applications for approval to understand their preferred qualification characteristics, including the markers of quality they look for when selecting qualifications. We hope, by providing this information, that we can assist awarding bodies in developing the best possible qualification offer.

**Decision:** We will publish strategic guidance which focuses primarily on labour market trends, skills shortages and rising skills demands. We will also seek to include additional information, sourced from employers, which directly relates to aspects of qualification design and presentation. In time, this guidance will also seek to communicate employer views on the sufficiency of the available technical qualification offers within the market.

#### **Question 4.1: Are you clear as to where different types of qualifications will fit within the categories described?**

**Consultation response:** 16% of respondents were very clear as to where the different types of qualifications will fit within the categories, and 40% were somewhat clear. Of the 27% who were somewhat unclear or very unclear, respondents felt that detailed examples would be beneficial as well as a more detailed explanation of the difference between Level 3 occupational entry and Level 3 occupational progression and the students these qualifications are designed for. There were also comments suggesting the need for guidance around what to do if a qualification fits more than one category. Concerns were raised about the categories being open to interpretation and that different awarding bodies could put similar qualifications in different categories.

**IfATE response:** Over half of respondents reported being clear as to where qualifications would fit within the future technical categories. However, we recognise that there is work to be done to ensure categories are sufficiently clear to enable informed choices as to where qualification offers fit in the new landscape. Responses identified a need for additional examples to support understanding, as well as ensuring the differences between each category are sufficiently explained. We have taken on board suggestions through the consultation and will ensure that published materials and support sessions to deliver clarity to the awarding sector. When published, our 'cross cutting function' category will be amended to reflect

ministers' recent decision to also make technical qualifications approved in this category available for public funding for 16-19 students.

**Decision:** We will publish additional explanations and examples alongside the finalised category framework. This will include clear descriptions of each category, alongside its core aim and purpose statements. This will support awarding bodies in identifying in which category to best place their qualification offers. We will stagger the roll out of categories to ensure awarding bodies can develop familiarity with the criteria and process, prior to expanding our approvals to the full range of technical qualification categories. This will include the moving of 'Occupational progression' and 'Employer proposed' categories into Cycle 2 of the reforms. We also intend to implement a registration of interest phase which will allow IfATE to identify any awarding bodies seeking to align their qualification to a category we deem unsuitable and provide advice on how best to align their offer with our technical qualification categories.

#### **Question 4.2: We have set out our proposed approach for pre-defining additional specialist areas and cross-cutting functional areas against which awarding bodies can submit qualifications. do you foresee any issues with this approach?**

**Consultation response:** Of the 37% of respondents who did not foresee issues with the proposed approach, there were comments on how this process will ensure flexibility and how the list will be helpful if there is an exceptions process to allow for niche or developing areas. Almost half (44%) of the respondents foresaw issues with the proposed approach for pre-defining additional specialist areas and cross-cutting functional areas against which awarding bodies can submit qualifications. Some respondents cited the need for flexibility as pre-defining additional specialist areas could lead to delays in creating new qualifications that reflected emerging specialist areas. Further information was required in relation to how the pre-defined duties list will be produced and what measures will be used when assessing qualifications against the list.

**IfATE response:** Some respondents noted potential issues with the proposed approach to pre-defining areas for qualification development. Many responses stated the need for agility within the system as the major concern in this area. IfATE intends to use the pre-defined list to ensure that awarding bodies are aware of specific areas of existing and future skills need, ensuring they can align their qualification offer accordingly. Under each of the identified areas, IfATE will also publish a list of duties an individual in the area would be required to undertake in the workplace. These duties are intended as a framework around which awarding bodies design their offer.



In identifying these areas and duties for our pre-defined list, IfATE have reviewed existing qualification offers and surveyed employers through our various channels. We believe that the issuing of pre-defined areas and duties provides an element of consistency to qualifications within the additional specialist and cross cutting offers, whilst allowing the flexibility for awarding bodies to go beyond the duties we pre-define. The inclusion of an area on the pre-defined list will also exempt an awarding body from submitting a proposal through the exemption process we have decided to implement (see response to question 4.3). IfATE expects this to reduce the burden on awarding bodies, providing assurance as to the areas they might develop qualifications in. Where something does not appear on our pre-defined list, this will not prevent an awarding body submitting an application for approval. However, any such application will first be required to be submitted through our exemption process.

**Decision:** We will publish a list of pre-defined areas and associated duties to inform awarding body developments in additional specialist areas for Cycle 1. This will be in addition to the introduction of an exemptions process which will allow awarding bodies to provide proposals for technical qualifications they intend to develop. Qualifications aligned to areas identified on the pre-defined list will not require an exemption request to be submitted prior to submission for approval. For Cycle 2 of the approvals process, we will publish further additional specialist areas, alongside cross cutting function areas.

### **Question 4.3: Do you see a need for IfATE to introduce an exceptions process to allow awarding bodies to submit proposals for developments in the additional specialist and cross-cutting functional areas?**

**Consultation response:** 62% of respondents agreed with the need for IfATE to introduce an exceptions process to allow awarding bodies to submit proposals for developments in the additional specialist and cross-cutting function areas. However, some concerns were raised about the use of the term 'cross-cutting functional areas' due to its perceived lack of currency amongst employers. In addition, concerns were raised about the costs associated with revising qualifications and the burdens that would need to be considered for this approach.

**IfATE response:** The need for an exception process was popular with respondents, with many agreeing there is a need for such a process. Respondents once again tied this back to a need for agility within the system; as well as to allow awarding bodies to suggest additional qualifications for which they have identified demand (but have not been identified on the pre-defined list). We accept that the pre-defined list will not be exhaustive and therefore an exception process will be beneficial to ensure that awarding bodies can bring forward proposals for development. As with the use of the pre-defined list, we expect that the up-front review of awarding body proposals for



the relevant categories will ensure that IfATE can promote consistency among qualification offers, ensuring they are likely to meet the needs of employers. Full details of how the exemption process will be managed, including timescales, will be published alongside our full criteria and guidance for Cycle 1.

**Decision:** We will implement an exception process which we will refer to as ‘the proposal stage’. This ‘proposal stage’ will allow awarding bodies to submit proposals to IfATE for qualification developments in the relevant categories. In submitting a proposal, awarding bodies will be asked to provide key details of the intended development, alongside evidence of employer demand for the proposed qualification. Exact information requirements for the proposal submission will depend upon the category the intended submission will align to.

### **Question 5.1: Do you agree that the evidence requested is sufficient to assure IfATE of employer demand for submitted qualifications?**

**Consultation response:** Nearly half (45%) of respondents agreed that the evidence requested would be sufficient to assure IfATE of employer demand for submitted qualifications. Further guidance and finer details were recommended as being helpful. Of those who disagreed (37%), there were comments about the need for clearer data on labour market intelligence, demand, job roles, and progression.

Employers fed back that there was a need for the system to be forward looking and the challenge of gaining access to smaller employers who are less active in qualification development but are the most in need of upskilling support.

**IfATE response:** IfATE see the evidence requested relating to employer demand and wider employer representation as key to ensuring fit for purpose, future proofed, qualifications and we have ensured both requirements feature heavily within the fully developed employer demand test. We have also taken onboard responses which sought additional information as to the specific asks within the test. To this end we have developed a list of specific questions that any submitted rationale must answer, alongside a detailed list of evidence requirements and supporting guidance. In developing the test, we have continued to consider the burden placed on awarding bodies and have sought to balance this with our need to be suitably assured of the employer demand for a qualification. As a result, we have incorporated into the test the possibility for awarding bodies to utilise elements of desk research and qualification progression data within their wider evidence submission.

**Decision:** We will carry forward the principal evidence requirements detailed in the consultation for the Employer Demand Test. We will also ensure that the criteria which is to be met is suitably clear for applicants, including specific requirements relating to employer representation and the need to future proof qualification materials.

## **Question 5.2: Do you have access to any additional data / evidence which you feel IfATE should consider when assessing the employer demand for submitted qualifications?**

**Consultation response:** Just under half (43%) of respondents provided information on the additional data and evidence they can access that might assist IfATE in assessing employer demand. Comments outlined the benefits of using, for example, survey data, sector skills bodies, professional membership bodies, quantitative labour market data, teaching practitioners and working with combined authorities who are developing Local Skills Improvement Plans. They explained the need for clear guidance on employer evidence, including specific examples of what will be accepted. They suggested that small employer focus group work is too narrow, and that additional evidence could be provided by researchers and professional bodies. Several respondents were concerned that the proposals favour awarding bodies that are larger, with dedicated staff to engage with employers. They questioned whether IfATE will offer support to small awarding bodies to help them identify employers.

**IfATE response:** Respondents cited a wide variety of evidence which they felt would be beneficial for IfATE to consider when assessing the demand for a submitted qualification. We agree that items such as Local Skills Improvement Plans (LSIPs), GLA/MCA reports and qualification progression data can be rich sources of insight into employer demand; and we will therefore make clear that such information can be submitted. As stated in response to Q5.1, we are keen to allow applicants the flexibility to incorporate desk research into their evidence submission. Whilst this desk research will not remove the need for direct employer engagement, applicants can seek to strike a balance between the two. Where a balance is sought, it will be important for applicants to explain through their employer evidence rationale why their bundle of evidence is suitable to assure IfATE of the demand for a submitted qualification. We believe this flexibility will be useful in ensuring that awarding bodies of any size can establish evidence of demand through whichever means are most accessible to them. Whilst we cannot provide an exhaustive list of all desk research that we might consider through the process, we will look to provide guidance alongside our criteria which provides a steer for applicants as to what types of evidence may be best suited to satisfy our requirements.

**Decision:** The employer demand test will provide flexibility for applicants to provide a mix for qualitative and quantitative evidence. Applicants will be expected to rationalise their evidence submission, explaining to IfATE why they feel their approach to establishing employer demand provides suitable assurance. Applicants can draw on a range of evidence, supporting their direct engagement with reference to employer informed skills plans, such as LSIPs. IfATE will render a judgement on the employer demand for a qualification, taking into account the applicant's rationale and accompanying evidence submissions.

## Question 6.1: Is the proposed process clear for submissions into the employer proposed category?

**Consultation response:** Most respondents (57%) agreed that the process for submissions into the employer proposed category is clear. However, they also outlined concerns that the process would be too slow. Many would like estimates of the timeframes for approval within this category. A particular concern was around the length of time it takes for a new standard to be approved and what impact this has on a qualification submitted to this category. There was a general consensus that this could stifle innovation and flexibility for awarding bodies, as well as their ability to be responsive to changing skills needs. There were also concerns around being reliant on employers to submit occupational proposals to IfATE and the impact revisions to standards might pose to qualification development in this space.

**IfATE response:** We are pleased to observe that most respondents indicated they were clear as to the proposed process for approving qualifications in the 'employer proposed' category. We are conscious that respondents once again raised the need for agility in the system and that there were questions as to how long the described process would take. We believe that where there is evidence for the existence of an occupation, IfATE should always have an associated standard on our maps. The establishment of this standard before qualifications are approved against it aims to ensure consistency, however we would not preclude qualifications being developed in tandem with the standard. This approach also ensures that approved qualification materials will not be subject to substantial changes soon after approval (for example, if qualifications were approved pre-standard development, which were then required to align to a standard post-approval). Regarding process timelines, this will be determined on a case-by-case basis, with the volume of revisions or formation and availability of employer groups leading to variabilities in timescales. We are however working on efficiencies within our occupational standard processes which we hope will add agility to the system in future. In these scenarios we will work closely with awarding bodies and give them as much notice as possible about timeframes and ensure we consider the potential impacts in individual cases.

**Decision:** We will introduce the described process for submissions into the employer proposed category. We believe that, where an occupation meets IfATE's definition, it is only right that a standard should be developed. As such, where we do not identify a standard to which the proposed qualification may align, we will require the submission and approval of an [occupational proposal](#) prior to agreeing to a development in the employer proposed category.

## Question 6.2: Are you clear as to our proposed criteria for testing content aligned to KSBs within occupational standards which are published by IfATE?

**Consultation response:** Over half of respondents found the proposed criteria provided suitable clarity, with 11% of respondents finding the proposed criteria to be very clear. Almost half (44%) of respondents found our proposed criteria 'somewhat clear'. Many respondents raised concerns about sectors that use National Occupational Standards (NOS) and how this will interact with IfATE occupational standards. This was outlined as a specific issue for those qualifications which are offered across the four nations, as IfATE's occupational standards apply in England only. Several respondents raised concerns about what happens when content in the NOS contradicts knowledge, skills and behaviours (KSBs) or when the sector recognises NOS or professional body standards over IfATE's. Respondents would appreciate clarity on the approach to content which does not map to KSBs and whether there will be flexibility for this. Awarding bodies would like to receive KSB mapping templates from the outset to ensure more effective planning and time management.

**IfATE response:** Over half of respondents advised that they were clear or somewhat clear as to how we will test content aligned to KSBs. The primary question raised by respondents was in relation to the role of National Occupational Standards (NOS) in the forming of qualification content. Whilst alignment to KSBs is the minimum requirement for some technical qualification categories (for example, occupational entry 16-19 and adult) we recognise that NOS may be a useful reference point for content above and beyond the KSBs within IfATE's occupational standards. For all categories, IfATE allow applicants to include additional content which is valuable within the occupation. We would encourage applicants, where KSBs and NOS do not overlap, to embed elements of NOS as additional qualification content where employers have indicated this is desirable. It is, however, important to note that National Occupational Standards are no longer widely used in England, with a decision taken in July 2016 to cease funding them. As a result, where NOS is relied upon, we would expect that awarding bodies be able to indicate clear employer support for the inclusion of this content.

**Decision:** In line with the principles laid out in the consultation, we will publish criteria for testing content aligned to KSBs within our employer led occupational standards. The existence of National Occupational Standards may act as a guide for awarding bodies in developing their offer, however mapping to these standards will not be assessed in the same way as mapping to IfATE owned employer-led occupational standards. Any mapping to NOS will be considered using our additional content criteria.

### **Question 6.3: Are you clear as to our proposed criteria for testing content aligned to pre-defined duties which are published by IfATE?**

**Consultation response:** Over half of respondents found the proposed criteria provided clarity, with just under half (47%) of respondents answering, 'somewhat clear' and 9% answering 'very clear'. 29% of respondents felt we had not yet provided enough detail for them to answer the question more specifically. Primarily, this related to a need for further clarity on how pre-defined duties will be established in the first instance. Several respondents felt that a pre-defined list lacked flexibility which could hamper the timely development of qualifications, and sought assurances that the process will be responsive.

**IfATE response:** Over half of respondents advised that they were clear or somewhat clear as to how we will test content aligned to pre-defined duties. Of those who were unclear, we note that the primary ask was for additional detail as to how this process will be implemented and assurances that it will not inhibit responsiveness. Per our response to Q4.3, we will ensure that awarding bodies are able to propose (via the proposal stage) their own duties within relevant areas, allowing them to shape their qualification offers where they have identified an employer need that has not yet been included on the list. We will also, through our approval process, allow awarding bodies to introduce additional duties (not agreed at the outset of their development) where there is clear evidence of employer demand. Per our response to Q4.2, the intention to align content around pre-defined duties is borne out of a desire to promote consistency in those offers not directly aligned to KSBs within our occupational standards. This aids employer understanding of the baseline competencies being delivered by qualifications within each occupation. Criteria for how content must be aligned to duties, as well as the requirements when introducing additional duties, will be provided within the full criteria for the relevant technical qualification categories.

**Decision:** In line with the principles laid out in the consultation, we will publish criteria for testing content aligned to pre-defined duties. In line with our decision associated with Q4.3 we will ensure there is a mechanism through which awarding bodies might introduce additional qualification areas (and associated duties) into scope for approval. We will also allow, through our application of approval criteria, for awarding bodies to introduce additional duties into the scope of their submitted offer, where they can evidence employer demand for these additions.

### **Question 6.4: Are you clear as to our proposed criteria for testing content which does not align to any outcomes which are published by IfATE?**

**Consultation response:** The most common (40%) response received was 'somewhat clear'. Several respondents felt that the proposed criteria could stifle innovation, especially when a new qualification is needed on the market quickly to respond to skills needs. There were also concerns that it not only increases burden on awarding bodies, but also risks asking too much of employers, whose role is already being greatly expanded. Less than a quarter of respondents felt that this question was difficult to answer because not enough information was provided.

**IfATE response:** Just under half of respondents advised that they were clear or somewhat clear as to how we will test 'additional content' which does not align to any IfATE. Concerns raised in response to this question focused on how this criterion might inhibit agility within the qualification market. Where an awarding body has identified demand for knowledge, skills or behaviour which are in addition to any published by IfATE, we would expect that this has occurred through interaction either directly with employers, or through reviewing desk research informed by employers or industry trends. Per our responses to Q5.1 and Q5.2, we have made efforts to expand the range of evidence awarding bodies may rely on to justify their development decisions (and ultimately validate their submitted qualification). For additional content which directly relates to performance of the target occupation, IfATE see it essential that awarding bodies can evidence clear employer demand for its inclusion. We are however also aware that for some content it may be difficult to establish clear employer demand but may be essential to the overall development of an individual, especially for 16–19-year-olds (for example, additional Maths, English and Digital skills). We will therefore provide flexibility in our criteria to allow the embedding of such content without the need for additional employer evidence to justify its inclusion. Whilst additional evidence may not be required in these instances, IfATE expect to observe that any such content is coherent within the qualification and there is a clear link to utility in the occupation can be observed.



**Decision:** In line with the principles laid out in the consultation, we will publish criteria for testing 'additional content'. We do however acknowledge that some content can be more difficult to validate with employers (for example, the embedding of additional English, Maths and Digital requirements). Taking respondents views into account, we will ensure that our criteria for additional content does not unduly restrict awarding bodies from including content which may be beneficial to students.

## **Question 7.1: Are the assessment design flexibilities allowed helpful to ensure differences between occupations can be reflected within assessments?**

**Consultation response:** Most respondents (58%) answered 'yes' to the question. Overall, flexibilities and modularity were welcomed. Many respondents would like more detail on how modularity will work in practice. Several respondents detailed the need for a consistency of approach with Ofqual to ensure that there are no hidden restrictions to flexibilities. In addition, many reflected on the need for a standardised approach to grading, especially within an occupation to limit confusion amongst stakeholders. Several respondents emphasised the need to consider student manageability, especially for students with special educational needs and disability (SEND), for whom internal assessment or a greater variety of assessment methods may be more appropriate. Colleges and providers should also have an input to ensure that approaches to assessment are practical and deliverable.

**IfATE response:** Nearly 60% of respondents agreed that IfATE's proposed flexibilities would be helpful to ensure differences between occupations could be reflected within assessments. Some respondents sought further clarity on the extent of flexibilities, for example, in instances such as the development/delivery of modular assessment. We will ensure that our criteria suitably lay out any requirements that awarding bodies must meet if they choose to develop modular assessments. Respondents also raised the need for coherence with Ofqual's requirements. There is a need for awarding bodies to comply with [Ofqual's requirements](#) which are being published alongside this consultation response document. It is important to note that IfATE do not intend to specify specific weightings of assessment (be that internal or external assessment). Ofqual also do not propose to set weighting expectations in relation to technical qualifications. Consequently, there are no 'hidden' requirements present within this area. Our requirements also do not preclude awarding bodies from offering on-demand assessments, thus providing the flexibility to respond to specific customer needs in this area. IfATE and Ofqual's requirements have been developed to ensure coherence, removing duplication in the process, and ensuring that awarding bodies need only submit one set of documents to satisfy the need of both organisations.

We also note that respondents raised SEND students as a particular group to be considered in the assessment space. We agree that it is important that the needs of SEND students are factored into assessment development. All awarding bodies are already required to adhere to [Ofqual general condition D2](#) which requires that any qualifications they make available comply with equalities law and do not disadvantage any student groups who share particular characteristics. Awarding bodies are also required to adhere to [Ofqual general condition G6](#) relating to the requirement to have in place arrangements for reasonable adjustments. We do not feel it necessary to add additional requirements for awarding bodies in this area. Working within these general conditions, we believe that the degree of flexibility allowed through our criteria will ensure that awarding bodies are not constrained from developing their qualification assessments with the needs of this student group in mind.

**Decision:** In line with the flexibilities laid out in the consultation, we will publish assessment criteria which allows awarding bodies the flexibility to develop assessments which reflect the needs of different occupations. We also believe the degree of flexibility allowed through our criteria will ensure that awarding bodies do not experience undue barriers in developing assessments which are suitable (or could be reasonably adjusted to be so) for all student groups.

## Question 7.2: Is the guidance provided around assessment design sufficiently clear to facilitate the development of high-quality assessments?

**Consultation response:** An equal number of respondents (38%, 38%) answered 'yes' and 'no' to this question. Many asked for a clear definition of 'high quality', seeking clarity on what this means in practice. Similarly, respondents questioned the separation of roles between IfATE and Ofqual, outlining how Ofqual through their regulatory function are already assuring quality. They would appreciate clarity on why IfATE is undertaking additional measures in this space and how this intersects with the role of Ofqual. Respondents requested clarity around grading and the definition of terms. Several respondents suggested that IfATE allow the same set of assessment documents be submitted to both IfATE and Ofqual to reduce duplication, or the reworking of the same materials into different submission formats. Others reflected on the need for both college and training provider input to comment more effectively on the manageability and deliverability of these proposals.

**IfATE response:** Respondents provided a diversity of opinion on this topic, with an equal split of agreement and disagreement. Some responses cited a lack of clarity as to how IfATE characterises 'high-quality' in the context of assessment. As IfATE is an employer led organisation, our fundamental requirement is that we observe that



assessments are likely to meet the needs of employers. Therefore, the primary quality judgement we make relates to the capacity of assessments to determine whether a student has met the KSBs for an occupation, therefore enabling employers to recruit effectively. We do however acknowledge that the use of the term 'high-quality' is somewhat ambiguous and will therefore ensure we are more precise within our approval criteria and guidance when discussing matters of 'quality'. Respondents also raised the need for one set of documents to satisfy IfATE's and Ofqual's requirements. We agree this is an important point and have planned in line with this principle. Through the approval process it will be possible for applicants to submit one assessment strategy and one set of sample assessment materials (SAMs) per qualification, with the submitted documents meeting the needs of both IfATE and Ofqual. Where qualifications share an assessment approach, awarding bodies may choose to submit an overarching assessment strategy document which addresses their approach to the development and delivery of a suite of products. We will also ensure that additional detail is provided within our guidance in line with the further clarifications promised in response to Q7.1.

**Decision:** In line with the principles laid out in the consultation, we will publish assessment guidance, alongside our criteria, which provides awarding bodies additional detail on IfATE's expectations for assessments, referencing Ofqual's requirements where appropriate. As set out in our response, awarding bodies will not be required to submit alternative versions of documents to IfATE and Ofqual, with the submission of one set of documents being suitable for the purposes of both organisations' reviews.

### **Question 8.1: Do you agree with IfATE's proposed requirements relating to the accurate description of content in qualification titles?**

**Consultation response:** Most respondents (65%) agreed that our proposed requirements reflected an accurate description of content in qualification titles. Those who agreed felt that this approach would increase clarity in qualification titling. Some respondents commented that the titling as proposed has potential to become unnecessarily bureaucratic and unwieldy. There were calls to address the length of the title under the current proposal, with suggestions to remove the need to include standards within the title. Several respondents requested the inclusion of sizing within the qualification title, to ensure that providers were clear on how the qualification fits within a learner's study programme. Employers mostly commented on the approach being a sensible and pragmatic one.

**IfATE response:** Almost two thirds of respondents (65%) agreed with the IfATE proposed requirements for accurate qualification titling. Of those who did not agree, we note that the major concern raised was in relation to the length of proposed titles.

We believe that reference to competence and occupational standard/job role are essential markers of utility for an employer audience and this was corroborated in responses to the consultation. We therefore maintain that both should feature within qualification titling. We have, however, undertaken work to establish how best to balance this requirement with the need for clarity in titling. To ensure this balance is met, we will publish additional criteria and guidance relating to the proper titling of technical qualifications to ensure that awarding bodies are able to achieve accessibility and consistency within their qualification titles.

**Decision:** In line with the principles laid out in the consultation, we will publish criteria and guidance for awarding bodies to follow when titling their technical qualifications, and where applicable we will refer to Ofqual's requirements on qualification titling as set out in the General Conditions of Recognition.

## Question 8.2: Would it be helpful to employers if the title of a qualification included confirmation of employer endorsement following approval by IfATE?

**Consultation response:** Just over half of respondents (51%) disagreed with the proposal to include confirmation of employer endorsement, by way of reference to IfATE approval, in the title of a qualification. Those that disagreed outlined that should qualifications go through rigorous checks via Ofqual and against IfATE criteria, it would therefore be assumed that qualifications have already attained employer endorsement. Respondents reiterated the need for qualification titles to be concise without unnecessary additional quality marks, which fail to provide a clear purpose. Some respondents suggested that the inclusion of employer endorsement through qualification titles would be appealing for prospective learners. More generally, several respondents expressed a desire better to understand how 'employer endorsement' would be achieved and measured.

Employers mostly welcomed the proposal. However, respondents were unclear on the approach that would be taken to establish 'employer endorsement' with calls to ensure that the stakeholders involved are representative of a diverse range of employers, professional bodies and regulators.

**IfATE response:** Just over half of respondents disagreed with the utility of including a specific marker of IfATE approval within qualification titles. Responses generally indicated that stakeholders were interested in knowing more about how employer endorsement would be established, and the best means of communicating this. Per our response to Q8.1, we feel that competence and occupational standard/job role are the primary pieces of information that a title should communicate. We also acknowledge the need for additional references such as awarding body and level, which are outlined in Ofqual's General Conditions of Recognition. We have therefore

decided not to proceed with the requirement to include reference to IfATE approval within qualification titling. We will, however, continue to explore how the IfATE brand might best be used to promote technical qualifications approved through the post-16 qualification reform process.

**Decision:** We will not take forward the requirement for a signal of employer endorsement (of approval) to feature within technical qualification titles. We believe that, in time, IfATE endorsement will become synonymous with employer endorsement, acting as a mark of quality in the technical qualification space. We will therefore continue to investigate how best to leverage the IfATE brand in the promotion of technical education products.

### **Question 8.3: Do you agree that the publication of KSB mapping in occupational entry qualification specifications is beneficial to employers and providers?**

**Consultation response:** Most respondents (80%) agreed with this proposal. Respondents welcomed the approach taken highlighting that the more KSBs are reiterated, referenced, and consistently referred to, the better users will start to understand them in the technical educational landscape. There were some reservations of including KSB mapping into specifications, as specifications should be succinct and include performance outcomes and an elaboration of learning content. Therefore, including the mapping may result in the specification becoming large and unmanageable. Overall respondents agreed that the approach outlined in the question will allow for transparency and clarity within qualifications.

**IfATE response:** Most respondents agreed with the proposal to include KSB mapping within qualification specifications. We believe the inclusion of this will assist a variety of stakeholder groups in better understanding the value of the qualification, as well as helping to facilitate the recognition of prior learning (RPL). We note some respondents raised the issue of this information complicating the specification document for users. We are happy to allow awarding bodies the flexibility to decide how best to integrate this mapping into their offer to avoid any accessibility issues for qualification users.

**Decision:** In line with the principles laid out in the consultation, we will publish information relating to the inclusion of KSB mapping within the specification documents of approved technical qualifications. Whilst we do not intend to mandate this as part of approval, it is clear from the responses that the publication of this information will be valuable to stakeholders when assessing the value and transferability of technical qualifications, and so we encourage awarding bodies to do so within their approved materials.

## Question 9.1: If you are an awarding body, what EDI data do you currently collect for students who undertake your qualifications and would you be prepared, and able, to share it?

**Consultation response:** Most respondents (56%) answered 'N/A' to this question, with the view that it is not a mandatory requirement to gather EDI data. Those that collected EDI data and were willing to share insights (9%), outlined the data sets that they collated. Those that were not prepared to share EDI intelligence (11%), commented that they were unable to do so predominantly due to data protection implications. There were indications that by working collaboratively to overcome data protection issues, some respondents would be willing to share EDI data with a clear understanding of how the data will be used.

**IfATE response:** We noted that respondents felt unable/unwilling to share Equity, Diversity, and Inclusion (EDI) data with IfATE in relation to the cohorts of students who undertake their technical qualification offers. EDI is a primary concern of IfATE's in ensuring that the products we approve are accessible and provide progression opportunities to all students who take them. We will, in the near future, publish an EDI framework on which we expect our stakeholders to consider in the development of all qualifications. We also aim to provide, through our employer strategic guidance, further information as to potential EDI concerns within route areas, ensuring awarding bodies regard this when developing their qualification offers. We note that responses cited data protection as a potential barrier to sharing cohort EDI data. Whilst we acknowledge this as a possible barrier, we will look to engage the awarding sector in further discussions in this area to explore this matter further.

**Decision:** In the immediate term, we will not look to require the submission of any EDI data as part of our process of approvals. We will however publish further guidance in the form of our EDI framework to inform development and delivery decisions. We will seek to engage the sector in further discussions to better understand concerns relating to the sharing of EDI data.

## Question 9.2: If you are an awarding body, how do you plan to embed our sustainability and digital skills frameworks in qualifications?

**Consultation response:** This question was open response only and 6 respondents provided an answer. Most respondents reported that they currently do, or intend to, embed digital skills frameworks and sustainability in qualification design. Most respondents reported that sustainability and digital skills are fundamental to organisations, therefore incorporating these skills into qualifications is necessary.

Generally, respondents endeavour to consider both the sustainability and digital skills frameworks when developing, reviewing and updating products, to align with government agendas and new and revised occupational standards, at all levels. Some respondents added that they had developed their own approaches to sustainability and digital skills, and where possible they would adhere to IfATE's frameworks.

**IfATE response:** Most respondents expressed that they were comfortable with the prospect of embedding sustainability and digital skills content (based on IfATE's frameworks) into their qualification offers. The embedding of content in these areas is essential to ensure that qualifications meet the skills needs of the future, most notably skills required to achieve net zero. Where applicants have their own processes in place for embedding such content, we are pleased and would want to find out more. We would encourage all applicants to use the information published by IfATE in these areas to ensure that they are maximising the inclusion of this vital content.

**Decision:** We will require, as part of qualification submissions, that applicants provide details of their approach to embedding sustainability and digital skills into their technical qualification. We will ask awarding bodies to explain this approach as part of the qualification submission form.

### **Question 10.1: With reference to the impact assessment published in Annex A, are there any additional steps that could be taken to mitigate any negative impact, resulting from the proposed approach to approvals?**

**Consultation response:** Just over half of respondents answered yes to this question. Additional considerations for the approach to approval included giving due regard to the additional regulatory burden and costs that awarding bodies may experience as a result of the reforms. There was a call for IfATE to consider offering grants to awarding bodies to enable resourcing for additional qualification development. Respondents repeatedly requested collaborative support and guidance from all departments involved in the approval process, to minimise administrative burden. Concerns were raised in respect of IfATE failing to meet the need of adult learners and a request for the inclusion of modularity in design principles. IfATE's internal staff resourcing was also raised on a number of occasions, flagging the need for IfATE to consider this as a risk in slowing/delaying the approval process. Some respondents have suggested that IfATE considers allocating IfATE personnel to each awarding body to ensure there is continuity in communication and a level of accountability. Respondents also called upon IfATE to give consideration to the financial impact that providers will feel as a result of curriculum planning, management, and administration, which are not recognised in

the annex.

Employers asked that IfATE put in measures to ensure that the employer voice is representative of a diverse range of organisations from small, medium and large enterprises.

**IfATE response:** We acknowledge that these reforms place pressure on several groups associated with the development and validation of qualification materials. The reforms have been designed to ensure that requirements are not duplicated between IfATE, Ofqual and, where relevant, DfE. This includes our commitment to ensuring that awarding bodies need only submit one set of documents to meet the review requirements of each organisation. We have explored options to increase flexibility for applicants, ensuring they can utilise their own areas of strength in the collection of employers evidence, rather than taking a one size fits all approach. It is our expectation that these flexibilities will enable applicants to adapt their approaches to the collection of evidence, by increasing the evidence base available to them. This is intended to ensure that applicants unable to engage directly with employers in large numbers (due to capacity and/or cost) have the option to strike a balance in the evidence they collect. We also intend that IfATE resources, such as the employer strategic guidance, will act in such a way as to reduce burden on awarding bodies in identifying employer needs, as well as aiding them in accessing essential sources of information which will assist them in developing their offers.

We also note that respondents raised one such impacted group as being IfATE itself. We have reviewed this and believe we are fully equipped to manage the volume of approvals in a timely manner. We will continue to consider the internal resources required to maintain agility in the system and meet the expectations of our stakeholders. We will also, where reasonable, ensure that awarding bodies have access to a dedicated IfATE representative to assist them during the initial cycles of the reform process.

We note other responses relating to the overall timeline of reforms. We acknowledge the challenge of balancing the many and varied requirements present within the process. For the first two cycles of approvals, route areas and categories will be separated in such a way as to stagger the requirements on awarding bodies. When planning timelines for delivery of approvals, we have also placed an emphasis on ensuring suitable awarding body development and provider readiness time. We will continue to engage directly with our stakeholder groups to understand their concerns and what mitigations can be implemented to address them.



## Question 10.2: With reference to the impact assessment published in Annex B, are there any other potential impacts (positive or negative) that have not been identified?

**Consultation response:** Just under half of the respondents felt that there were no other impacts to consider. Respondents were however unclear on how IfATE intends to keep standards and, as a result, qualifications up to date in the market. Respondents also questioned how the approval process takes account of the future emergence of new skills and how they can be incorporated into qualifications in an efficient and agile manner. There were concerns that failing to meet the emerging needs of employers may lead to the development of unregulated qualifications within the market.

**IfATE response:** Whilst over half of respondents identified no further impacts, several provided comments relating to the maintained currency of occupational standards. IfATE undertakes regular route reviews with the intention of ensuring that standards are updated in line with employer needs. We also, on occasion, undertake ad hoc revisions of standards when the need arises. This ensures that all standards are reflective of current employer needs. As it relates to approved technical qualifications, IfATE, through the Skills Act, also has a statutory duty to review the qualifications which sit within our approval. These reviews allow IfATE to monitor the currency and efficacy of approved qualifications, establishing any requirements for revisions or, in some cases, the removal of IfATE approval. We will soon publish details of the intervals in which such reviews will take place.

Per our responses to Q5.1 and Q6.4, we are also keen to ensure that awarding bodies can embed future skills needs into their qualification materials. This flexibility will ensure that, where employer demand is evident, awarding bodies can suitably integrate emerging skills into their offers. In addition to this, IfATE's dedicated emerging skills team will continue their work to identify areas of future demand within the economy. Insight from this team will inform IfATE's work, including occupational standard updates, our pre-defined lists, and the awarding body strategic guidance that we issue.

As detailed in our response to Q10.1, we are also exploring means of designing flexibility into the approvals regime more generally.

### 3. Engagement events

#### Communication approach and statistics

Between 4 July and 10 August 2022, we used a range of communication platforms to ensure a broad response to the consultation. This included making targeted communications via social media (LinkedIn and Twitter), a dedicated website area, stakeholder webinars, direct stakeholder emails and guides, conferences, and news articles. Communications were tailored to stakeholders with a direct interest in the consultation including employers, awarding bodies, education providers, students, professional bodies, charities, DfE and Ofqual. Through using targeted engagement, the consultation section of our website gained over 3,500 page views. Of these page views, almost 1,500 were unique. We also received over 14,000 impressions across LinkedIn and Twitter, over 100 reactions or likes, more than 60 shares, and over 300 click throughs.

#### Engagement events

A series of webinars took place during the consultation period to support stakeholders with details of the proposed reforms for the approval of technical qualifications. These webinars attracted 150+ attendees. The first series of webinars, delivered jointly by IfATE and Ofqual, provided stakeholders with clarification of the roles of each organisation within the approval process. The second series of webinars were delivered solely by IfATE. They targeted employers, awarding bodies, education providers and professional bodies. IfATE webinars provided tailored content to introduce the purpose of the consultation including the context of the reforms and the proposed approval process for the submission of new and reformed qualifications at level 3 and below.

Table 1: Stakeholder types who attended the webinars

STAKEHOLDER TYPE	PERCENTAGE OF ATTENDEES
Awarding body	18%
Employer	25%
Training provider	32%
Professional or regulatory body	6%



Other	19%
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In addition, we held three employer focus group sessions during the period. Each of the three sessions comprised of a mix of employers and employer representatives from different routes and sectors. Across each session, attendees had varying degrees of experience in developing qualifications with awarding bodies.

## Stakeholder feedback

Stakeholder engagement provided a wealth of valuable feedback which will be considered across the development of the approval process. Feedback was largely positive, supporting the need for a simplified qualifications landscape: *“Employers need a clear understanding of the qualifications that are available and their value to their organisation”*. Employer representative bodies were similarly positive, with feedback supporting our approaches to titling proposals: *“The approach is a sensible and pragmatic one to ensure clarity and understanding for stakeholders”*. Stakeholders also noted the ease of engagement with our consultation, with dedicated communications for stakeholders and the implementation of tailored guides with specific content for each stakeholder for example, the employer guide.

From webinars and focused discussions with provider representatives, the general feedback was directed towards the rigidity of the new system being described in the consultation document, the timescales for implementation, and the lack of certainty regarding the degree of change to the system. Feedback from employers attending webinars indicated the need for IfATE to engage more broadly with professional bodies and to build on discussions with stakeholders to demonstrate the action made based on the feedback provided.

The discussions held during the employer focus groups suggest that employers do not feel as involved as they could be in changes to level 3 and below reforms and find it difficult to keep up to speed with the changes in the technical educational landscape which will impact them significantly in the future. Linked to communication was the need to ensure that, when engaging with employers, they represent a breadth of IfATE products including Apprenticeships, T Levels, HTQs and level 3 and below technical qualifications. Throughout engagement with employers, it was noticeable that there was confusion on IfATE roles and responsibilities. There was, however, positive feedback about the prospect of IfATE branding, although further details were needed about what IfATE approved would mean for an employer, provider, awarding body or professional, statutory and regulatory bodies. Whilst engaging with employers, the suggestion was also made for IfATE to improve and expand its relationships with professional, statutory and regulatory bodies.

Employers and awarding bodies welcome employer-led guidance and employer

engagement in shaping the design of qualifications. Feedback indicated that a joined-up approach between employers and awarding bodies as well as early collaboration with education providers *“would be of benefit to shape the ‘deliverability’ of courses and ensure they are at the correct level and have clear career/ progression opportunities.”*

IfATE also received positive feedback in support of developing qualifications around occupational standards, with discussions indicating that this approach would enhance understanding of what knowledge, skills and behaviours have been gained by the student in the achievement of the qualification. The majority of stakeholders also felt that the criteria for testing content developed around the knowledge, skills and behaviours within these occupational standards was very clear or somewhat clear.

## Next steps

We have used the feedback generated through the consultation and engagement activities to inform our decisions about the approval process and criteria and to tailor future communications with stakeholders. Building on the success of bespoke guides for awarding bodies and employers, we will also seek to develop tailored communications for providers. We will also explore opportunities for closer working with providers through the development of a provider insight panel. The panel will aim to create an opportunity for providers to feedback on key considerations in relation to how reforms are implemented at delivery level. Any provider with an interest in understanding more about this panel and how it will be implemented should contact the Post 16 Team by emailing [IfATE.POST16@education.gov.uk](mailto:IfATE.POST16@education.gov.uk).

In response to feedback regarding the need for broader engagement with professional bodies, we are currently identifying and building new partnerships through which to engage with these reforms. We will ensure that employers are sought from a range of diverse sectors and that micro employers and small to medium sized enterprises (SMEs) are equally as engaged as large employers in our future work. We are committed to implementing an approval process that is agile, rigorous, streamlined and coherent.

We are grateful for the time taken by those who responded to consultation or attended a webinar, meeting, or focus group with us.

## ANNEX A. Breakdown of responses

The consultation generated 51 responses, primarily via the online questionnaire, with one respondent emailing in a response instead. Respondents included a range of individuals and organisations, and participation in the consultation was on a self-selecting basis. A breakdown of respondents by sub-group is presented in table 1.

In responding to the online questionnaire, respondents were asked “Which of the below best describes your viewpoint in this consultation?”. Respondents could select one answer only. In view of the relatively small numbers in certain groups and the self-selecting nature of the responses, we have been cautious in interpreting these results as wholly representative.

Table 1: Stakeholder types who responded to the consultation

STAKEHOLDER TYPE	PERCENTAGE OF RESPONDENTS
Awarding body	29%
Employer	20%
Further Education College	8%
Headteacher / Principal	2%
Charitable Organisation	8%
Student	2%
Teacher / Lecturer	2%
Non-departmental Public Body	2%
Other	27%

If ‘Employer’ was selected, the respondent was asked two further questions relating to the route/s they work in and whether they are part of any IfATE groups. The

results were as follows.

Table 1: Routes worked in by employers who responded to the consultation

ROUTE	PERCENTAGE OF RESPONDENTS
Construction and the built environment	30%
Engineering and manufacturing	30%
Hair and beauty	10%
Catering and hospitality	10%
Health and science	10%
Business and administration; Digital; Legal, finance and accounting; Sales, marketing and procurement; and Transport and Logistics	10%

Respondents were also asked whether their viewpoint was representative of their organisation, them as an individual, or other. Of the 42 respondents who answered this question 88% were responding with a viewpoint that was representative of their organisation and 12% were responding as an individual. 61% of respondents had engaged with IfATE’s approval process previously.

Table 1: Previous engagement with IfATE’s approval process

YES, FOR HIGHER TECHNICAL QUALIFICATIONS	YES FOR T LEVEL PROGRAMMES	YES FOR BOTH	NO
5%	28%	28%	39%

Respondents were not required to answer each question, meaning that sometimes the percentages do not necessarily reflect the views of all respondents to the consultation. The percentage breakdown based on responses is demonstrated within the tables as and when required.



Institute for Apprenticeships  
& Technical Education

Institute for Apprenticeships and Technical Education

Sanctuary Buildings,  
Great Smith Street,  
London, SW1P 3BT

5 Quinton Rd, Coventry  
CV1 2WT