



A Public Consultation on Level 4 and Level 5 and Higher Education in Further Education:

A Summary of Responses

Contents

Introduction	3
Context	4
Data Summary of Responses	6
Overview	7
Summary of Responses	8
Section One: Purpose and Principles	8
Section Two: Higher Education Qualifications	10
Section Three: Higher Education Delivery by Different Providers	14
Section Four: Foundation Degree	19
Section Five: Higher Education Student Funding	24
Next Steps	27
Focused Conversation on Key Themes	27

Introduction

This document sets out responses to the Department for the Economy's (DfE's) public consultation on level 4 and level 5 and Higher Education in Further Education (HE in FE). The consultation was published on 15th December 2022 and closed on the 9th March 2023. Respondents could provide feedback via the Citizen Space online platform, email or post.

The consultation sought views on level 4 and 5 provision and Higher Education in Further Education (HE in FE) – these are higher education courses and qualifications undertaken by learners aged 18+. This provision is primarily vocational in nature, is offered in a range of subject areas and is delivered mostly by further education colleges in partnership with universities and awarding bodies. Qualifications at this level can lead directly into employment or on to further study, including to undergraduate degrees; they are also used by those already in employment to improve their skills and career prospects.

The consultation document sets out the background to the review and explains what level 4 and 5 qualifications are and what higher education in further education is. The consultation sought views on the purpose and principles of level 4 and 5 provision and higher education in further education and sought views on a number of policy issues as outlined in this document.

The consultation received 36 responses from stakeholders, ranging from further education colleges, higher education institutions and awarding bodies; to parents and school teachers. Responses were also received from an industry body, a local council, a political party and others.

There was broad support for the majority of the proposals contained in the consultation document and further suggestions/refinements were offered by respondents. There were varying views on the approaches in some sections such as **'What qualifications to deliver?'** and **'Who should deliver higher education qualifications?'**.

This document provides an overview of the feedback received, a brief reminder of the proposals and a summary of responses.

Context

HE in FE is the delivery of higher education courses through the further education sector. Further education colleges have been delivering higher education courses in Northern Ireland since the 1980s and are now considered established providers of higher education by the Quality Assurance Agency for Higher Education.

- Most of the higher education delivered in the colleges is at levels 4 and 5 on National Qualification Frameworks though there is also a small amount of provision at level 6 and above. Frameworks define and link the levels and credit values of different qualifications. The current frameworks for Northern Ireland are:
- The Regulated Qualifications Framework (RQF) for general and vocational qualifications regulated by Ofqual in England and the Council for the Curriculum, Examinations and Assessment (CCEA) in Northern Ireland;¹ and
- The Frameworks for Higher Education Qualifications of UK Degree-Awarding Bodies (FHEQ) for qualifications awarded by bodies across the United Kingdom with degree-awarding powers.²

The Department regards all qualifications on the above frameworks at levels 4 and above as higher education for provider funding and administration purposes. A distinction is made between designated and non-designated higher education courses for student support purposes, with students on non-designated courses not eligible for higher education student loans or maintenance support.

Designated higher education qualifications at levels 4 and 5 include Foundation Degrees, Diplomas of Higher Education, Certificates of Higher Education, Higher National Diplomas and Higher National Certificates. Designated higher education qualifications at level 6 are mostly undergraduate degrees. There are also a wide range of non-designated higher education qualifications that lead to diplomas, certificates and awards in a range of vocational areas.

While the Foundation Degree is the Department's preferred higher education qualification at levels 4 and 5 collectively, there are four broad categories of qualification that are delivered:

- a. University awarded qualifications (listed in the FHEQ): including Foundation Degrees, Certificates of Higher Education and Diplomas of Higher Education;
- b. Awarding Body designated qualifications (listed in the RQF): for example Higher National Diplomas (HNDs) and Higher National Certificates (HNCs);
- c. Awarding Body non-designated qualifications (listed in the RQF): professional qualifications such as accountancy, procurement, marketing or HR qualifications; and
- d. Awarding Body non-designated qualifications (listed in the RQF): other qualifications required for a specific vocational or technical pathway (for instance, in areas such as hair and beauty or social care).

1 See [Qualifications Frameworks | CCEA](#)

2 See [Qualifications Frameworks \(qaa.ac.uk\)](#)

All these types of qualifications are currently delivered in Northern Ireland's further education colleges as part of their higher education in further education offering.

Currently there are around 10,000³ students in higher education in further education in Northern Ireland, most of whom are studying at levels 4 and 5 (approximately 90%). Of these students, around 2,800 students are full-time with the rest studying part-time. There are also approximately 2300 Higher Level Apprentices. In 2020/21, there were approximately 2,700 Foundation Degree enrolments in higher education in further education, 68% of which were full-time.

³ See [Further education sector activity in Northern Ireland: 2016/17 to 2020/21 | Department for the Economy \(economy-ni.gov.uk\)](#)

Data Summary of Responses

Responses

Total Number of Respondents	Citizen Space Online Platform	Email
36	23	13

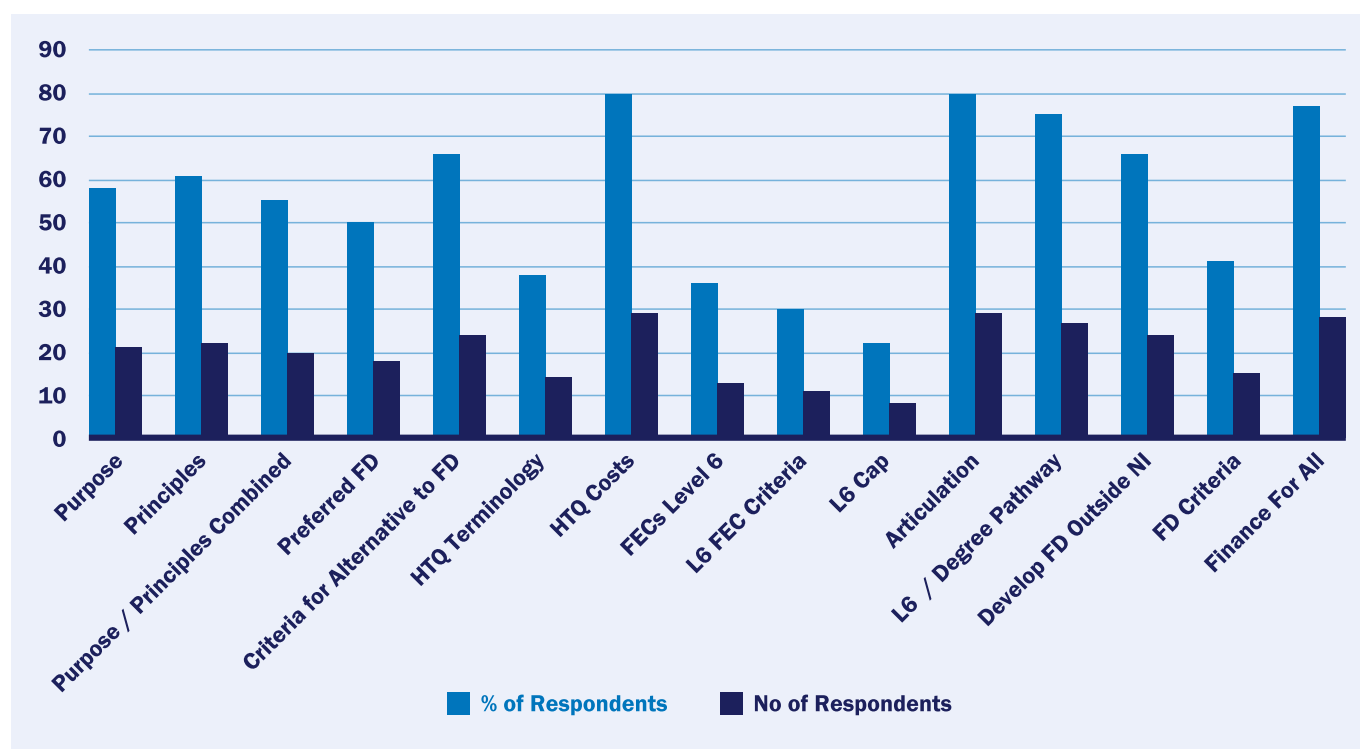
Respondent Profiles

Higher Education Institutions	*Further Education Colleges	Awarding Bodies	Local Council	Political Parties	Teacher/Parent/School	Organisation/Other
5	12	4	1	1	8	5

*Respondent profiles have been grouped here as identified in the response to the consultation.

Organisations	Individuals
28	8

Respondents Who Broadly Agree



Overview

The consultation considered and proposed options across the following 5 areas:

1. Purpose and principles;
2. What qualifications to deliver?;
3. Who should deliver which HE qualifications?;
4. Foundation Degree policy; and
5. Funding for students undertaking level 4 and 5 qualifications.

There was broad agreement on the purpose and principles, Foundation Degree Policy and funding for students undertaking level 4 and 5 qualifications. It is acknowledged that within these areas there is scope for refinement/clarification and further detail would be required on how proposals would be put into practice.

Further consideration may be required in respect of two areas.

In the context of **‘What qualifications to deliver?’** the main area to be further investigated is the Foundation Degree as the preferred qualification as opposed to an overarching designation similar to the approach to Higher Technical Qualifications (HTQs) in England. Further suggestions were also proposed such as, for example, further education colleges having Foundation Degree awarding powers.

In the context of **‘Who should deliver higher education qualifications?’** there were divided opinions on limiting the circumstances in which further education colleges can deliver level 6 qualifications – there were opposing views on this section.

We also recognise that consideration is needed on how current processes may need to be changed to ensure consistent application of the principles, proposals and criteria set out within the consultation. For example, the criteria and evidence required for when a further education college can seek partnerships with universities outside Northern Ireland (Foundation Degree Policy). Additional engagement with stakeholders on the application and implementation of these proposals will be taken forward as required.

Summary of Responses

Section One: Purpose and Principles

The Purpose of Level 4 and 5 Provision and HE in FE:

The overarching purpose of level 4 and 5 provision and higher education in further education is to support a globally competitive, regionally balanced economy where more individuals and businesses can reach their potential.

Purpose 1 – to meet the current and future needs of employers:

- Professional qualifications relating to a specific occupation or career including licence to practice/standard industry requirement for a particular occupation;
- Upskilling and development of existing employees; and
- Strengthening future workforce requirements through the provision of Higher Level Apprenticeships.

Purpose 2 – to meet the needs of learners:

- To provide suitable pathways to higher education qualifications;
- To widen participation in higher education, particularly in creating suitable opportunities for those facing barriers to education, including those from disadvantaged backgrounds;
- To support progression to employment;
- For career transitioning or reskilling; and
- For personal development or interest.

The Principles of Level 4 and 5 Provision and HE in FE:

- Further education colleges should continue to provide a broad range of high quality higher education pathways, particularly focusing on identified local need, key strategic clusters and the Level 4 and 5 needs of employers and learners;
- Level 4 and 5 provision and higher education in further education should primarily be professional and technical and linked to the economic and skills need of local business and industry;
- Higher education in further education provision should be agile and responsive to best meet local and more niche higher level qualification needs;
- Level 4 and 5 and higher education in further education provision should promote and support widening participation and lifelong learning;
- Further education colleges should offer higher education progression pathways locally for learners at levels 2 and 3; whether at school, further education college or in an apprenticeship; and
- Value for money, quality, avoidance of duplication and complementarity of provision should always be considered when taking forward any level 4 and 5 and higher education in further education provision. Further education colleges should collaborate across the sector (through curriculum hubs where applicable) and with a range of stakeholders, including universities where relevant, in the design and delivery of provision.

There was 58% agreement on the purpose and 61% agreement on the principles of level 4 and 5 provision and higher education in further education. There was 55% agreement that the purposes and principles combined are appropriate for guiding future policy and delivery of level 4 and 5 provision and HE in FE.

There was broad agreement on our stated principles and purposes for level 4 and 5 provision and higher education in further education. Those who ‘disagreed’ suggested expanding the stated purpose and principles (for example to include Meta Skills), but did not materially disagree with the purpose and principles proposed.

Careful consideration of terminology was highlighted, for example it was suggested that the phrase ‘progression into ‘Higher Education’ devalues the higher education within further education offering and could suggest higher education in further education is not viewed as on a par with higher education in universities.

Some of the respondents felt that the purposes and principles attributed to ‘higher education in further education’ are not at all unique to ‘higher education in further education’ and would be commonplace in universities, for example ‘higher education in higher education’ can also be vocational or technical as the subjects delivered range from Engineering and Surveying to Computing or Accounting.

A number of respondents agreed that the principles and purpose should be kept under periodic review to allow for any future changes in provision.

One respondent believes that current and future planning should consider the needs of the growing Irish language sector in the provision of qualifications. It was suggested that current offerings do not provide adequate routes for Irish speakers seeking employment in the sector and Irish-medium pupils are at a disadvantage with regards to the choice of course and educational pathways they can follow through the medium of Irish.

It was noted that universities award Certificates and Diplomas in Higher Education as exit awards and some respondents would not wish to see this inhibited, should levels 4 and 5 be solely the domain of the further education colleges.

Section Two: Higher Education Qualifications

The Foundation Degree emerged as the Departments 'preferred' qualification at Level 4 and 5 collectively through a number of Departmental strategies and there is currently no guidance or criteria established as to what other qualifications are appropriate or under what circumstances other qualifications can be delivered at level 4 and 5.

The following options are summarised for consideration:

Option 1: Status quo – retain the current position that the Foundation Degree is the 'preferred' qualification at level 4 and 5 collectively;

Option 2: Retain the current position that the Foundation Degree is the 'preferred' qualification at level 4 and 5 collectively but work with providers and validating institutions to ensure the Foundation Degree can be used flexibly to better meet the needs of a wider range of learners and employers and establish clear criteria where alternative qualifications can be delivered;

Option 3: Remove the preference for a particular level 4 or 5 qualification but put in place an overarching approval process using quality criteria, similar to the approach to approving Higher Technical Qualifications in England;

Option 4: Remove any preference for a particular level 4 or 5 qualification and allow providers complete freedom to choose and deliver qualifications they believe best meet the needs of learners and the economy, provided the qualifications are on a National Qualification Framework; and

Option 5: Select an alternative preferred qualification, such as HNC and HNDs or a new suite of level 4 and 5 Diplomas and Certificates, focused on technical skills and designed to meet local need.

There was 50% agreement that options 2 and 3 were the most appropriate for further consideration. 34% of the respondents that disagreed supported other options suggested, whilst others provided variations or alternatives to the options presented.

In support of option 2 (61%) respondents noted the following:

- it was recognised that Foundation Degrees have become more established in the mindset of learners, universities and employers and there is a clear link to university. It was suggested that option 2 is best suited to retain current integration and progression to higher education;
- there was a commitment to the use of Foundation Degrees to support progression to employment or progression to university and working across institutions to ensure that Foundation Degrees offered meet the needs of learners and employers;
- the past performance and positive outcomes associated with the current system was noted; and
- it was noted that option 2 allows for flexibility and the use of other qualifications where Foundation Degrees are not the best option.

In support of option 3 (14%) respondents noted the following:

- it was suggested that option 3 represents a better choice to ensure an appropriate and diverse qualification landscape that can meet the needs of learners and employers;
- depending on a number of overarching factors the model provided at option 3 could lead to greater visibility and awareness of level 4 and 5 pathways with the goal of greater uptake. It should also offer greater flexibility for colleges to respond to employer needs and the needs of the economy;
- option 3 could offer greater opportunity for the delivery of niche or bespoke qualifications which could be widely welcomed by specific industries e.g. the construction industry;
- the appeal of the flexibility and the marketing potential of option 3 was also noted; and
- a variation on option 3 was proposed - where qualifications have been through similar approvals processes in other jurisdictions and passed, they could be fast-tracked for approval.

Challenges provided included:

- being sceptical about the need to introduce a new brand for levels 4 and 5 qualifications, similar to Higher Technical Qualifications in England, given the space is already considered to be complex for students, employers and parents to navigate; and
- the need for any offering similar to Higher Technical Qualifications in England to reflect the local requirements in Northern Ireland, for example a larger number of small to medium sized employers.

There was some support for option 4 as it was proposed that this would allow colleges and employers more flexibility and greater speed of response given the perceived lack of flexibility and long turnaround times inherent in Foundation Degrees.

Alternative suggestions were also proposed:

- the creation of a new publicly funded Awarding Body that allows a suitable qualification to be developed;
- further education colleges being granted Foundation Degree Awarding Powers (FDAP) allowing colleges greater flexibility when engaging with new partners for example, cross border institutions; and
- modular certification was proposed, allowing for micro credentials to address industry needs for upskill/alternative pathway for those who are in employment but wish to reskill and exit at level 5 into the labour market.

Many respondents felt that the options, like the purpose and principles, should be kept under periodic review to allow for any future changes in the educational landscape.

There was 66% agreement on the criteria proposed for where it may be appropriate to select an alternative qualification to a Foundation Degree, if a Foundation Degree was to remain the 'preferred' qualification.

There was broad agreement on the criteria proposed, those who disagreed were mainly concerned with the local university engagement criteria.

Some of the respondents felt that further education colleges should be able to develop their own provision reflecting the needs of their region economically, regardless of whether local universities are able to develop Foundation Degrees. It was suggested that the current Foundation Degree delivery model does not represent a true partnership because of the level of control it cedes to a university.

Feedback showed the desire for the further education sector to collaborate with higher education institutions across the UK or in the Republic of Ireland as part of a shared island initiative. For example, learners should be given the opportunity to study a Foundation Degree in Northern Ireland with the possibility of articulating onto an undergraduate degree in the Republic of Ireland. Others were of the view that provision outside of Northern Ireland should be only permitted under exceptional circumstances.

Some clarity was sought on the operation and application of the criteria for example what level of qualitative and quantitative detail would be required to demonstrate compliance with the criteria and what measures would be put in place to ensure the criteria is met.

There was 38% agreement to work with England to use the Higher Technical Qualification terminology, if we were to adopt an overarching designation and 80% agreement that an overarching designation with associated quality assurance would create additional costs and time requirements.

The majority of respondents disagree with working with England to use the Higher Technical Qualification terminology if we were to adopt an over-arching designation.

Respondents highlighted the need to focus on the needs of Northern Ireland such as local employer needs, the make-up of the employer base (including a large number of SMEs) and the different landscape in England where HTQs have been adopted.

Rather than the terminology/use of a HTQ brand, issues were raised with the perceived system in England which was noted as very complex and different in terms of scale. The suggestion was that any benefit of an overarching designation and quality assurance process would not be proportionate to the cost given the size of Northern Ireland.

There was broad agreement that an overarching term is helpful and clear when referring to level 4 and 5 qualifications and may enhance the understanding of level 4 and 5 provision. However, many of the respondents felt that the focus should be on local employer needs as the landscape in Northern Ireland is very different to England.

If HTQs were to be adopted, it was suggested to introduce a 'passport' style approval process - if a qualification is already a HTQ the requirement would be to obtain support from local NI employers.

If HTQs were not to be adopted, it was proposed that English standards could be used but equally National Occupational Standards could act as an external reference point and would be desirable in order to support comparability and transfer of skills across nations.

The majority of respondents agreed that an overarching designation with associated quality assurance would create additional costs and time requirements. It was suggested that England had additional new funding in place and it is unclear how such an initiative might be affordable in Northern Ireland.

It was also suggested that costs could be kept to a minimum by diverging from England standards as little as possible, or alternatively developing a publicly owned awarding organisation that allows a suitable qualification to be developed for Northern Ireland.

Section Three: Higher Education Delivery by Different Providers

The current approved policy position is that further education colleges can offer only the first and second years of an undergraduate degree programme except in exceptional circumstances. This focusses provision on level 4 and 5 with level 6 provision only in exceptional circumstances.

The following options are summarised for consideration:

Option 1: Maintain the status quo, which means that further education colleges can only offer Level 6 undergraduate degrees in exceptional circumstances;

Option 2: Restrict HE in FE to levels 4 and 5 only, with no exceptional provision;

Option 3: Continue to limit the circumstances in which the further education colleges can offer level 6 undergraduate degrees but with clear criteria defining the circumstances when level 6 undergraduate degrees can be introduced; and

Option 4: Allow further education colleges complete flexibility in the level of their higher education in further education provision, within the confines of The Further Education (Northern Ireland) Order 1997.

31% of respondents agreed with the preferred option 3 proposal – to continue to limit the circumstances in which the further education colleges can offer level 6 undergraduate degrees but with clear criteria when this could be introduced.

Those who agreed with the preferred option 3 proposal included representation from industry, awarding bodies, universities and some other organisations.

Those who disagreed with the proposed preferred option 3 proposal (53%) were mainly from the further education sector reflecting 14 of the 19 responses who disagreed. Some of those who disagreed pointed to option 1 (maintaining the status quo) or option 2 (restrict HE in FE to levels 4 and 5 only, with no exceptional provision).

In addition to those who agreed or disagreed, another 16% of respondents did not provide a preference explicitly but provided information for consideration.

Some respondents who disagreed pointed to the success of level 6 provision at further education colleges both in terms of attrition rates and outcomes, and believed that the colleges should have the opportunity to gain further autonomy to build on their experience and expertise in this space.

It was suggested that there needs to be more flexibility so that the colleges can be responsive to emerging local and regional demands, and it was suggested that this may be in the form of new provision which provides articulation from level 5.

One college suggested that 'limiting the circumstances' or having criteria which needs to be applied becomes burdensome, time consuming and could become a barrier to level 6 provision.

It was suggested by some colleges that there should be a more encouraging process when delivering level 6 qualifications at colleges, particularly to support employer and economic needs across Northern Ireland in line with the Departmental priorities such as 10x, Widening Participation and Lifelong Learning.

The further education sector pointed to provision at level 6 as supporting access, rural locations, alternative delivery and providing a focus on technical and vocational qualifications that are in subject areas that are clearly in demand in the economy and have strong employer partnerships at their core.

However, there were some conflicting responses supporting, for example, the preference to restrict higher education in further education to levels 4 and 5 only, with no exceptional provision (option 2). Those proposing this approach were from a higher education institution but did recognise that there may be very limited circumstances in which the further education colleges continue to offer existing level 6 undergraduate degrees which have been historically run in the colleges.

A number of the respondents from the higher education intuitions were of the view that new level 6 qualifications should only be offered in the colleges in exceptional circumstances and that it was important to retain this requirement to promote collaboration between the colleges and universities rather than creating competition. It was noted that genuine and timely engagement would ensure significant differentiation with existing or planned level 6 provision.

It was also felt by some in the higher education intuitions that extending the level 6 provision currently available in further education colleges could lead to duplication to provision.

In addition, it was suggested that there was an implication that universities were remote and the provision of level 6 in a further education college is required to support access to HE. However it was noted, for example, Ulster University, has a regional campus distribution.

Section Three: Higher Education Delivery by Different Providers

Proposed criteria for the delivery of level 6 undergraduate degree provision going forward:

- There must be clear and sustainable demand at local or regional level, linked to priorities set in the 10X economic vision or identified in the Northern Ireland Skills Barometer;
- There must be evidence of strong support from local or regional employers and evidence of likely sustainable demand from potential students;
- There must be engagement with Northern Ireland universities and university colleges to ensure there is significant differentiation with existing or planned level 6 undergraduate degree provision in local universities or university colleges – or agreement from those institutions to the new provision. A conclusion to the engagement and agreement liaison, where relevant, should be facilitated by the universities and university colleges within a timescale of six weeks;
- Additional provision should be endorsed by the relevant further education Curriculum Hub where one exists and any relevant Professional or Regulatory Bodies;
- Provision should be part-time unless a particularly strong case is made for why full-time provision is necessary and relevant;
- Provision should contribute to widening access to higher education and meeting rural needs; and
- Further education colleges should demonstrate sufficient expertise of teaching staff, in line with relevant agreed policies.

There was 30% agreement with the proposed criteria for the delivery of level 6 undergraduate degree provision.

Industry bodies, awarding bodies, school representatives, a college and some other organisations agreed with the proposed criteria.

Most of the respondents disagreed with the proposed criteria for the delivery of level 6 undergraduate degree provision (51%) but to varying degrees and for different reasons. Some respondents advised that they did not fully agree with the criteria or were in broad agreement however, it could be refined to be more clear. While a small number disagreed with having any criteria for level 6 provision within a further education setting at all (preferring full freedom for further education colleges or alternative options such as no further education provision as highlighted previously).

The majority of the further education sector did not fully agree with the criteria and, for example, highlighted the need for flexibility so that colleges can be responsive to emerging local and regional demands. The preference was put forward to have further education colleges deliver through to level 6 where the local conditions require it with suggestions that there is evidence of success reflected in terms of attrition rates and outcomes where level 6's have been delivered in a college setting.

One of the colleges expressed concerns about the requirement for endorsement from the relevant further education Curriculum Hub where one exists, as not all industry areas have an associated Curriculum Hub. There were also concerns that some Curriculum Hubs are further developed than others in their ability to endorse curriculum.

Another college felt that some of the criteria proposed appeared to lean towards a university theme and more balance was required, it was suggested that the current level 6 provision is considered to be urban centric and is difficult to access as people must travel to either Derry, Belfast, or Coleraine. The college also suggested that the only criteria required should be that level 6 provision is aligned to the economic strategy of 10x and has relevance to employer need for upskilling or re-skilling.

Concerns were raised with restricting level 6 provision within a further education college to part time only as this seemed to suggest that only part time learners participate in HE in FE. It was also suggested this could limit the interest of learners who may wish to progress from level 5 to level 6 on a full time basis and this could push students to look to alternatives in other nations.

One respondent agreed with the requirement that “further education colleges should demonstrate sufficient expertise of teaching staff, in line with relevant agreed policies”, however felt this was best assessed by the validating institution, rather than the Department.

Some respondents pointed to the requirement for DfE to approve new level 6 provision and suggested that adherence to this was sometimes being overlooked and highlighted that agreement from the Department must be sought in all cases. It was also suggested that Departmental agreement would ensure that universities did not have a “veto on level 6 delivery in a college”, as the Department making the ultimate decision would be taking the views of universities and university colleges into account.

Clarification was requested in respect of the application of the criteria – for example, if just one of the criteria needed to be met, all of the criteria needed to be met or if there would be weighting applied. Further detail was requested on how this would work in practice, for example what qualitative and quantitative evidence for each criterion would be required and what monitoring/sampling mechanism to be included to ensure adherence.

It was suggested that lead in times could be considered again as the turnaround requirement of six weeks could be challenging. However, other responses agreed with the timescale of six weeks to conclusion appropriate.

62% disagreed with a cap on level 6 provision in further education colleges.

There was a high level of support for not capping level 6 provision at the colleges from the further education sector. Some respondents from the university setting also reflected this position plus others including an awarding body. Those who agreed with setting a cap on level 6 provision in further education colleges were mainly from the university sector and others such as an awarding body that suggested a cap would be required if, for example, the criteria for level 6 provision was removed.

Many respondents from the further education sector felt that any student who completes level 5 provision should be able to progress to level 6 within the college and that level 6 provision in further education colleges is appropriate as they have the industry knowledge and relevant experience to deliver high quality provision. It was suggested that a 'number' would remove flexibility and the focus of HE in FE should be on level 4 and 5 with some level 6 which may be necessary, particularly in specialist or emerging areas.

It was suggested by one respondent that agreement on the development and delivery of level 6 provision should be sufficient to manage the proportion of full-time level 6 provision offered and that part-time provision should not be considered for capping. Another respondent added if level 6 delivery in the colleges is exceptional and this is adhered to then a cap is not necessary.

One awarding body suggested that any cap should be on an individual case by case basis and blanket policies would stifle creativity.

One respondent suggested if a greater demand exists for level 6 in a college than level 5, it is difficult to justify why it is better to force level 5 provision on students and employers if the demand isn't there. The respondent did not agree that a perceived oversupply of degree level graduates in areas that are in high demand in the economy is a bad thing as this can stimulate additional economic activity, as opposed to just being a supply of skills levels that the Department and economists perceive employers need.

Some respondents were unsure whether some form of cap should be applied to each college to avoid oversupply and encourage further education providers to focus on the local supply of level 4 and 5 provision. Another response felt that a cap would be a matter for policy makers and funders.

A number of respondents, including one college, were in favour of setting a cap on level 6 provision suggesting a cap:

- for each further education college would ensure they are responsive to local industry demand;
- should be in place for both part-time and full-time provision across higher education institutions;
- is required if any criteria for level 6 provision was to be removed; and
- at further education college level would mitigate competition between further education and higher education, which could be reviewed on an ongoing basis dependent on demand.

One university emphasised their preference to restrict HE in FE to levels 4 and 5 only, with no exceptional provision, believing a university is better placed to meet the learning outcomes of level 6 provision regardless of the mode of delivery and location of the programme.

Section Four: Foundation Degree

A key work strand of the Review of level 4 and 5 Provision and HE in FE was on the Department's policies in relation to the Foundation Degree. In relation to the Foundation Degree, we wish to consider the following:

- should the Department have a policy on the articulation model used for the Foundation Degree? and
- what validation and partnership arrangements should be mandated by the Department, if any?

The following articulation options considered by the Department are:

- **Option 1:** To request a blanket one year top up articulation model across all Foundation Degrees, this is what is known as the 2+1 model;
- **Option 2:** The 'status quo' option – to leave the current Validation and Articulation Framework as it is; and
- **Option 3:** To amend the current Articulation Framework to elevate the 2+1 model as the preferred articulation model but to recognise there will be circumstances where this is not appropriate or possible and so the existing position that there can be no blanket model is retained. Articulation routes should be based on evidence and focussed on ensuring students can succeed – they may therefore need to reflect individual circumstances such as performance in the Foundation Degree. The approach to articulation should also be a consideration in decisions on who further education colleges partner with to deliver Foundation Degrees .

The following validation and partnership options are therefore put forward:

- **Option 1:** That the current policy remains in place that Foundation Degrees should be validated by a local university, unless unable or unwilling to do so;
- **Option 2:** That the current policy remains in place but greater flexibility to work with validating partners outside Northern Ireland is offered in specific circumstances (for instance, where it is the clearly stated preference of a local business with significant ongoing demand for these skills or where it is necessary to meet Departmental policy requirements);
- **Option 3:** That the current policy is removed and a further education college or group of colleges can seek a partnership with an institution outside of Northern Ireland in any circumstance; and
- **Option 4:** That the current policy is removed but that certain requirements are put in place (so that in seeking a partnership outside Northern Ireland, further education colleges must demonstrate arrangements would not present significant articulation barriers, for instance, or must collaborate with other further education colleges in doing so).

Key areas noted in the consultation responses include:

- 80% of respondents agreed that there should be no single model of articulation; and
- 75% of respondents agreed that with the underlying principle that Foundation Degree students can complete the level 6 qualification in a timeframe similar to a student undertaking the straight undergraduate degree pathways unless there is clear evidence that individual students or cohort of students are unlikely to succeed even despite appropriate support.

The proposals put forward on Foundation Degree Policy received broad support from respondents. There was broad agreement from respondents that there should be no single model of articulation. The further education sector suggested this would enable colleges to partner with technical specialists in particular areas and have flexibility to respond to the needs of industry.

Colleges noted a preference for having Foundation Degree Awarding Powers and suggested this should be considered in the context of a future delivery model for further education. A political party suggested that the potential benefits of the colleges having degree awarding powers should be explored pointing to the south of Ireland where universities and institutes of technology are both under the umbrella of higher education, due to the fact that institutes of technology also have degree awarding powers.

The 2+1 model was preferred by most respondents however, there was recognition that there will be circumstances where this is not appropriate or possible. Many respondents suggested that it should not take longer for a Foundation Degree student to complete a level 6 qualification when compared with a student undertaking a straight level 6 undergraduate pathway, unless there is clear evidence that the student would not be successful even with appropriate additional support.

Some respondents from the further education colleges suggested that as well as the timeframe, the number of credits a student needs to complete for a Foundation Degree and top up needs to be considered. It was suggested that currently students are being asked to complete a greater number of credits when coming through a Foundation Degree pathway than a straight Honours Degree pathway which is unfair for the Foundation Degree student.

One respondent suggested that it may be wrong to focus on a timeframe at all and it might be more beneficial to focus on delivering the outcome. Other responses also suggested the focus should be on the learner and their degree outcome/reaching their optimal graduate outcome regardless of the point or place of entry.

It was suggested by some respondents that a Foundation Degree route to level 6 requires more credits than in the rest of the UK and that a 2+2 model of articulation could force students to top up qualifications in other nations contributing to 'brain drain'.

One university suggested when comparing the timeframe of different pathways it was important to recognise the difference between credit and content – for example while a student may have the required credits they may not have studied a particular subject or subtopic that is relied upon in the level 6 degree. Another university suggested the need for a consortium approach in developing Foundation Degrees to support curriculum mapping and ensure student progression is not hindered.

One awarding body felt very strongly that the 2+1 model of articulation proposed in option 3 should be taken forward suggesting the study time and cost implications can be discouraging to learners when considering studying at level 4 and 5. Some processes for supporting students were suggested such as ensuring admission criteria to level 6 is clear and visible and the creation of more generic ‘top-up’ or bridging programmes within higher education institutions to support progression from level 4 and 5.

A number of respondents agreed that in some circumstances it may not be possible to implement a 2+1 model of articulation due to the degree requirements (e.g. professional body accreditation requirements). A number of responses suggested the need to consider the requirements of Professional, Statutory and Regulatory Bodies who may not recognise a 2+1 articulation arrangement, and may therefore not award professional accreditation.

It was suggested that often learners from a Foundation Degree route prefer a vocational learning style and that the difference in teaching environments between further education and higher education could be very challenging for some students. Some respondents, for example from the further education sector, suggested that students with the appropriate support and bridging arrangements could articulate onto level 6 at a university setting. Respondents from higher education intuitions suggested that this was already in place and gaps in learning can be supplemented by the use of optional modules delivered by the colleges/higher education institutions to ensure that the 2+1 articulation can be supported.

The views from higher education institutions ranged from a willingness to explore further expansion of 2+1 arrangements to preferring a single model of articulation being the 2+2 model.

One university was concerned with the emergence of both a 2+1 and a 2+2 model in the same field (from different higher education institutions) with different levels of professional accreditation – it was suggested that this could be confusing for students and possibly detrimental. The university also suggested that in order to complete the content equivalent to the second year of a degree, under the 2+1 model, could mean the Foundation Degree 12 week placement module and a work placement preparation module would need to be removed or become optional. This could disadvantage those who wish to take up employment after the Foundation Degree rather than progress to university.

Finally, some respondents suggested further clarification was needed on what would determine exceptional circumstances and another felt that the only exceptional circumstance should be where there is a professional body requirement.

Section Four: Foundation Degree

Validation and partnership arrangements – preferred option

Greater flexibility in validation arrangements may help further education colleges better respond to employer need and remove some barriers to entry – but could create other barriers, particularly in relation to articulation. In balancing these our proposed recommended option is option 4:

Further education colleges can seek partnerships with universities outside of Northern Ireland. However, this is subject to:

- compliance with relevant Departmental policies;
- evidence that articulation arrangements would not present a significant barrier for students wishing to articulate;
- collaboration to ensure new provision is only developed once and is used across all further education colleges; and
- confirmation that the arrangements would not be significantly more expensive for students or the Department.

- 66% of respondents agreed with the proposed option that Foundation Degrees should be able to be developed with universities outside Northern Ireland subject to the proposed criteria; and
- 41% of respondents agreed with the proposed criteria for when a further education college can seek partnerships with universities outside Northern Ireland.

The majority of respondents agreed that Foundation Degrees should be able to be developed with universities outside Northern Ireland subject to the proposed criteria. Those who disagreed were mainly from higher education intuitions.

Most of the respondents acknowledged that there may be instances where it may be preferable for colleges to work with higher education providers in the rest of the UK or Republic of Ireland however, it was also suggested that an awareness of the local offering is important and should be considered in the first instance.

It was proposed by some in higher education intuitions that colleges should only consider partnering with universities outside Northern Ireland if there is no option to partner with higher education institutions within Northern Ireland. Linked to this was a concern that there may be a lack of awareness of local offerings and the willingness to develop a local offering if the opportunity was raised.

Some further education colleges suggested that colleges should be permitted to deliver level 6 where there is employer need and/or a skill deficit and also where colleges are developing partnerships with cross border institutions.

Two responses asked for clarification on what 'outside Northern Ireland' meant, for example did this include other jurisdictions outside of the UK and, if so, the implications for quality assurance, student financing and the ability of those institutions to meet local need would be factors to consider.

One of the universities suggested that remote providers of Foundation Degrees in Northern Ireland was in direct conflict with the purpose and principle that providers are in the locality of demand. Local university engagement should continue as the preferred *modus operandi*. Another university was concerned that higher education institutions outside Northern Ireland may lack awareness of local sectoral requirements, have limited local subject expertise to design tailored programmes and have no commitment to the wider objectives of the Northern Ireland Tertiary Education Sector to build local economic capacity.

One respondent, who agreed with the proposed option, suggested that this strengthens the argument that colleges should be allowed to deliver level 6 provision. It was proposed that rather than have a university based outside of Northern Ireland validate a Foundation Degree where the articulation route lies outside of Northern Ireland, it would be better for the full degree programme to be delivered through the College.

In terms of the criteria, while 41% disagreed, there was general agreement by many on what was proposed. However, there were suggestions that the criteria could be expanded and additional information and clarification was requested, from some respondents, in terms of what evidence would be required to demonstrate compliance.

Those from the further education sector suggested that the collaboration criterion required built in flexibility as while this would work for common Foundation Degrees it would not work for all areas. It was suggested that specialist areas or those seeking to meet local business or niche business needs would require a module/specialist options. Another respondent suggested this criterion could pose issues with validation as it is not as straight forward as being able to validate one programme at one college which could then be delivered at any other college. Most universities need to approve a college through an institutional approval process to enable them to deliver their programmes before validating individual programmes.

There was also a suggestion from a college that there should be no criteria and that colleges should be permitted to collaborate and validate programmes on an all Island of Ireland and UK wide basis.

Some respondents from higher education intuitions suggested that clarification was required on the evidence required to demonstrate compliance with the criteria. One respondent advised they were unsure how the criteria could be met – for example if articulation was to a university in England then that would be a barrier given higher university fees – this would be significantly more expensive for the student when compared to articulation in Northern Ireland.

Finally, one of the universities suggested that an additional criterion to be added - the reason for why a partnership with a local institution is not being pursued.

Section Five: Higher Education Student Funding

Student support funding for level 4 and 5 qualifications

There are four options regarding student support funding for level 4 and 5 qualifications on which we are seeking views:

- **Option 1:** Continuing with the existing approach, with a limited number of qualifications supported by access to higher education student finance support at levels 4 and 5;
- **Option 2:** Opening higher education student finance support to all qualifications on the Regulated Qualifications Framework (in addition to existing qualifications);
- **Option 3:** Opening higher education student finance support to qualifications on the Regulated Qualifications Framework (other than a HNC/D, which are already eligible) which have been subjected to a separate quality assurance process; and
- **Option 4:** Opening higher education student finance support to qualifications on the Regulated Qualifications Framework which have been subjected to a separate quality assurance process (other than a HNC/D) until such a process can be fully integrated into the regulatory process.

There was 77% agreement with the recommended option 4.

There was agreement on the recommended option 4 with only one respondent not agreeing with this option and the rest not have an opinion or they didn't provide a response (19%).

One college disagreed and had a preference for option 2 - opening higher education student finance support to all qualifications on the Regulated Qualifications Framework (in addition to existing qualifications).

The higher education intuitions were supportive of this option. One response suggested option 4 provides an opportunity to enable all learners to access higher education but still provides an opportunity to further consider potential costs and to determine an appropriate mechanism to ensure the quality of any qualifications supported. Another response put forward said, if a range of qualifications are to be offered, then this option is appropriate as students should not be disadvantaged in terms of access to funding depending on which study pathway they select as most suitable for themselves.

Some of those who agreed with the recommended option also suggested some additional considerations, for example, one response sought to ensure that option 4 also protected HNC/D funding. Other responses sought clarification on why an additional quality assurance process was required if the qualification was already on RQF. Another response also suggested that it should be made clear here that the preferred qualification remains the Foundation Degree (if that is the outcome of the consultation).

Clarification was also sought by one response on the general phrase “**use of employer support**” as a quality support mechanism in the consultation document and would wish to see specific as well as qualitative evidence for this option:

“The Review of Level 4 and 5 and HE in FE, which has informed this consultation, recommended a wider approach to funding combined with a mechanism to ensure the quality of any qualifications supported with access to higher education student finance support. That quality assurance mechanism could be the same as that used if option 3 in Section Two is adopted. If that option is not taken forward, then similar options are open to us (assessment against relevant standards or employer support). There could also be a criteria based assessment undertaken by the Department or a partner organisation on the Department’s behalf. Any such process would bring additional costs for the Department and would need to be considered in light of other budget pressures.”

As well as comments on the criteria, a number of responses provided more general considerations as outlined below.

Some responses from the further education sector suggested that increasing the number of qualifications that fit the criteria would likely see an increase in the number of learners who qualify for student support and felt that this would be important in terms of widening access and participation. Further, it was suggested that this approach could address skills needed within certain sectors where existing employees who needed to upskill to level 4 and 5 would be more likely to undertake vocationally- specific HE qualifications (rather than a typical Foundation Degree programme). Another response suggested that funding needs to be aligned to economic need and flexibility needs to be inbuilt. With another agreeing that funding should be used to address the shortfall of those with level 4 and 5 qualifications. The response suggested that DfE could consider extending the Advanced Learner Loans used in England to the Northern Ireland landscape.

One respondent from the further education sector suggested that DfE generates a list of approved higher education qualifications that will attract financial support.

One response suggested that the funding for level 4 and 5 should be provided from the resources allocated to higher education in further education and should not impact on higher education in further education. The response went on to suggest that more information was required on the criteria for funding eligibility for example if the qualifications to be funded would only be those which are relevant to 10x.

One response wanted to highlight the importance to them of providing better support for part-time education students. It was suggested that a higher proportion of higher education students are studying at college on a part time basis. In order to support this, part time HE in FE students would benefit from more attractive student finance system and would provide a greater incentive for level 4 and 5 qualifications. Examples of support were suggested as more generous maintenance support and access to the childcare grant.

One response suggested a more diverse system of qualifications would come at additional costs for example in terms of oversight. The response also suggested there would be a risk of displacement, that alternative qualifications could risk the viability of Foundation Degrees as the preferred level 4/level 5 route. Additionally, the response advised that higher education institutions who validate Foundation Degrees rely on progression and articulation to their top-up programmes of higher education in higher education Maximum Student Number Allocations planning. Without a progression pipeline from a Foundation Degree, the costs of validating and quality assuring programmes may be too great given the relatively large number of courses with relatively small numbers of students on each.

Finally, it was suggested by a political party that all education should be free and publicly funded. It was suggested that students paying equivalent fees to those studying degrees at university should be entitled to the same level of financial support for example loans and grants to help with tuition fees and living costs.

Next Steps

Focused Conversation on Key Themes

- The Higher Education in Further Education and Widening Participation branch in DfE are grateful for the many responses to the consultation received.
- We note broad agreement for most of the principles and approaches put forward and have given careful consideration to all of the comments and suggestions.
- Some areas of feedback fall outside of the scope of this consultation but will be shared to inform other projects and initiatives in the Department as appropriate.
- We recognise that further consideration is needed in some areas, and we will continue our engagement with stakeholders.