

The UK Inter-Professional Group

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Response of UK Inter Professional Group (UKIPG) to the HE Paper '*Students at the Heart of the System*'

The UKIPG acts as a Forum for the major Professional and Regulatory Bodies in the United Kingdom. With 30 bodies in membership, some are statutory bodies; others regulate under a Royal Charter or are representative associations. Many are Competent Authorities for Directive 2005/36/EC. UKIPG is independent of Government and business and funded by its members. UKIPG is an active member of CEPLIS, the *Conseil Europeen des Professions Liberales*, a forum for European professional associations and regulatory bodies. It is, therefore, informed about professional HE in Europe.

The UKIPG thanks BIS for providing this opportunity to respond formally to the White Paper. Accepting that a White Paper is a statement of Government intentions, rather than an open consultation, this response will focus on matters where HE interfaces with the professions and concentrate on practical matters of implementation. Several UKIPG members will also respond independently and with emphasis on issues specific to their sector.

A major function of UKIPG is to facilitate mutual sharing of information, ideas and responses. It has regular meetings of its own education special interest group, which itself has meetings and discussions with bodies such as QAA, HEBRG, HESA, UUK. All member bodies are in touch with HEIs in their professional sector, particularly through their course recognition or accreditation work. There is opportunity for these discussions to take place in a password-protected area on the UKIPG web-site. Formal and informal discussion through all of these channels has led to the development of this response. We look forward to BIS being open to the future use of this resource to ensure effective development of 'professionally-related HE'.

Peter Swindlehurst
UKIPG Secretary

Response of UK Inter Professional Group (UKIPG) to the HE White Paper 'Students at the Heart of the System'

Introduction

1. The UKIPG acts as a Forum for the major Professional and Regulatory Bodies in the United Kingdom. With 30 bodies in membership, some are statutory bodies; others regulate under a Royal Charter or are representative associations. Many are Competent Authorities for Directive 2005/36/EC. UKIPG is independent of Government and business and funded by its members. Further general information can be found on its web-site, although most of the detailed work is password-protected to facilitate free discussion. See: www.ukipg.org.uk.
2. There is a tendency in Government and its agencies to use the umbrella term 'Professional and Statutory Regulatory Bodies' (PSRB) when referring to the generality of our constituency. We accept and live with this nomenclature as long as it is realised that all PSRB are not the same. As the name implies, some regulate under a particular statute or statutory order, and have less freedom of action compared with those which regulate under a Royal Charter or mutual consent. Some are representative bodies of professionals themselves. Most have a very close relationship with the relevant faculty in a HEI, with much mutual understanding and peer review and support; this sometimes leads to a different perspective of PSRB involvement from that of the same HEI's central administration. There is also a productive relationship between PSRBs and QAA in its work on Subject Benchmarks etc.
3. Many bodies have a remit and membership which is either UK-wide or GB-wide. Whilst we understand the political realities of devolution, and that this White Paper is not about them, we find having discussions on both principle and detail '*only about England*' to be rather unsatisfactory. It is a cause of unwelcome additional work and expense, whether in undertaking regulatory duties or promoting UK HE and professional qualifications as a world-wide brand – and that is what many of them are. Another general point is that many professional routes rest primarily on post-graduate programmes either within conventional universities or through other providers. The policy is incomplete until Post Graduate work, and the Research which supports it, becomes an integral part of the picture.
4. Finally, we must always remember that these professional bodies exist primarily '*for the public benefit*' and not to enhance the prospects of individual aspirants, students, practitioners or professional businesses. In their regulatory activity, PSRBs will always see this as their primary purpose, even if it leads to a perceived increase in costs.
5. With these words of general introduction, the remaining response will primarily be ordered in relation to each Chapter of the White Paper, focusing on the implications for the professions and suggesting ways in which collaborative working with the professions can assist with implementation.

Chapter 1 – Sustainable and Fair Funding

6. For the purposes of this response from the professions collectively, we will start with the premise that future funding will essentially be based on:
 - Students paying more eventually, so that they become more obviously influential customers of the HEIs;
 - Government paying less in the long-term, but having to fund greater loans initially;
 - Fees in the range of £6,000 - £9000.
 - Student fees – from loans – funding most teaching;
 - HEFCE core funding that will specifically support:
 - Those subjects which are inherently expensive to support and teach properly, because of their need for laboratories, workshops, plant etc
 - Strategic and vulnerable subjects;
 - Widening participation.
7. The proposal to provide loans to cover all undergraduate students, irrespective of mode of learning, is very welcome, as is the intention to bring the higher echelons of FE into the system (albeit a year later). For too long, we have had the rhetoric about the importance of FE, of progression routes, of work-based learning, and of access, yet have treated such students as less deserving of support than direct-entry school leavers.
8. Prior to the 1960s, the normal route for entry to many of what are now seen as 'graduate entry professions' was a work-based route associated with extended part-time FE and then HE education, leading either to success in professional body examinations or to other non-degree HE qualifications, some established particularly for the purpose as far back as the 1920's (such as the Joint Committee Higher Nationals in Engineering). Post-Robins, this began to change; a change which was accelerated by the introduction of CNAAs degrees, the 1992 Act, and then an almost default position of going on to HE 'to do something' as a normal part of growing up. Professional body positions changed accordingly, to accept 'accredited degrees' as the normal entry route for many professions or 'a good degree' as starting point for entry to professional training in others. This may now begin to change back a little, with aspirants to both HE and the professions comparing the relative costs and benefits of an initial work-based progression route, with part-time or distance learning, to direct entry to an undergraduate degree. At the 'Professions for Good' launch at ICAEW on 18th July, the HE Minister made specific reference to non-graduate entry routes to professions, and some were subsequently illustrated (perhaps to show how non-traditional entrants had benefitted). These routes do exist in many areas; professional bodies will need to see that they are now administratively efficient, and all in education, business, industry and the professions will need to ensure that they are sufficiently well publicised.
9. There is work for Government, for Schools, FE and HE, and the professions to do in this area to make the approach coherent and consistent, and particularly to recover some of the already lost ground. There are many

graduates of various disciplines not gainfully employed at an appropriate level, because their studies were neither vocationally relevant nor complemented by work-based skills development. They already have student loan debts. The new flexible HE and Skills agenda needs to be able to support these people into relevant learning, development and work, particularly in strategic and vulnerable areas. The funding, support and admission rules need to be sufficiently flexible and adaptable to facilitate this 'after graduation learning' which is not necessarily at a Post-Graduate (ie FHEQ level 7) level. This funding issue needs to be considered in the overall Post Graduate 'Smith Review', as does the affordability of Post-Graduate courses generally, where these are the normal routes to professional qualification in many areas (some statutorily regulated (eg by HPC) or others by Royal Charter). Funding by commercial or career development loans may be an actual or perceived difficulty, as the net levels of student debt are inevitably increased and lenders criteria remain 'hardened' in the recessionary financial climate. The fairly benign 'market reaction' to the first tranche of student fees (leading to the Langlands study) cannot simply be extrapolated, because the debts will now be so much higher, job prospects less certain, and an expectation of a long period of negligible economic growth.

10. Those professions which rely upon the 'expensive' courses (ie those which require laboratories, workshops, specialist plant like wind tunnels, access to professionally supervised work placements etc), and those whose discipline is based on 'strategic and vulnerable subjects', will welcome a commitment for them to be specifically and additionally supported by HEFCE 'core funding'. Equally, they will be concerned about the evidence base on which the judgements will be based by HEFCE, and the expertise of those making the judgements. There may also be a need for sharing and rationalising facilities into fewer and better centres of excellence, to ensure that world class facilities can be both available and have maximum utilisation. The evidence that professional accreditation teams (which include academic and industry-based members) gather during the accreditation of courses for professional recognition must be treated as a valuable and reliable source of evidence to be used by HEFCE in making these decisions. UKIPG would welcome the opportunity to discuss how best this resource could become part of the system, alongside that of relevant industrial organisations. It cannot and must not be seen simply as an administrative exercise in equitably sharing limited resources across a full range of providers. It is more strategic than that.

Chapter 2 – Well-informed Students Driving Teaching Excellence

11. The thrust of the funding policy is that aspiring students will be well informed customers of HE. For some, this will undoubtedly be the case – especially the more mature and work-experienced aspirants. For many, it will still seem to be an extension of schoolwork – with detachment from parental constraint. Many will have no real idea, and there is a suspicion that much current schoolwork keeps potential university students in a mindset of learning more and more set answers, and with less capacity for argument, innovative thought, and taking responsibility for own learning.

12. The opening topic in the Chapter is the variation in student work-load in subjects across various HEIs. Without seeing the original data, the results seem to be counter-intuitive, with not as much variation between the traditionally 'hard and intensive' courses and others as might be imagined. One hopes that the real variation is in the original definitions used for the data could make a major difference (for example, whether veterinary students count the time in vet practices on 'extra mural studies' during what otherwise might be vacations as 'student workload' or not – but all would have been required to do it). It is more likely that students' difficulties will relate to the level and amount of unsupervised work that they have to do, the ability to keep to submission deadlines, the quality of essay writing etc, especially in the first year. Whilst HEIs and perhaps the professions can help with this, the main responsibility rests with the schools and colleges, and the assessment system which drives their work, to prepare pre-university students properly. There are probably similar pressures at work in schools and colleges on subject selection; is it to maximise numbers above a certain grade, to facilitate staffing and 'setting' of students, or really to ensure that students are given the best advice on 'quality' of subjects rather than a total of UCAS points?
13. We note the comment in paragraph 2.7 on the value given to the practise of teaching in the university system, and have anecdotal evidence of academics being upbraided by their Vice-Chancellors for being too focused on the teaching and learning aspects of undergraduate work, which contributes little to the university as a business, compared with its RAE rating. From the professions point of view, we are interested in how HE teachers in professional faculties view both aspects of their professional status, and how each is monitored, for example for CPD. This is an area worth exploring jointly with the HE Academy and other professional bodies.
14. The UKIPG has been directly involved with both HEFCE and HEBRG on the development of Key Information Sets (KIS), supplying members to the 'Expert Group'. What seems at first sight to be a simple task of providing information on 'professional bodies that recognise the course' is immensely challenging and resource intensive. The risk is that it will 'authoritatively mislead' because the information is 'nearly right' or 'was right last year' or is 'incomplete'. This is because the requirements vary so widely.
15. For example, in some professions, courses are recognised for what they contribute – but without that being sufficient. Alternatively, a course might be recognised but not absolutely necessary. In other cases, an accredited course would be necessary for any kind of relatively easy progression to a professional register (although there could be more difficult and expensive routes around it). In other cases, the precise course is a *sine qua non*, and something similar is not much help at all (eg, to be a Pharmacist, the course must be approved for the purpose by GPhC; a pharmacology course will not lead to registration as a Pharmacist but may be suited to a career in the pharmaceutical industry).
16. For some careers, for which the course is an intended preparation, the aspirant will need an enhanced CRB clearance – probably even to allow some

necessary course placements to be undertaken. In others, there is a 'normal' entry route from A-Levels (or equivalent) but there are also some graduate entry routes (eg into medicine and dentistry) for those with an appropriate first degree. Universities change the names and content of courses to enhance their marketing appeal – which can mean that they need a re-entry in a professional body database.

17. None of this means that it should not be attempted, but simply that it must be done thoroughly and well, to agreed quality standards, and with full involvement of the appropriate PSRB and relevant Faculty in the University. General administration departments are generally not sufficiently *au fait* with the nuances. This was borne out by the experience of getting Section 5.2 of Diploma Supplements (which record professional recognition) issued accurately by Academic Registries, because only the Faculty knew the detail and were not asked. Although this work has started, it has not gone far enough in grasping the detail – and is unlikely to do better than providing a link to the professional regulator concerned. In this connection, we note that HEBRG has done some detailed work in this area, which it admits needs updating and correcting. UKIPG would like to be assured that there will be full consultation and detailed involvement, as the responsibility of the various HE agencies changes as a result of these overall policies.

Chapter 3 - A Better Student Experience and Better-qualified Graduates

18. The UKIPG and its member bodies' interests in this Chapter really begin with the Quality Assurance Section 3.15. We support the view that the UK QA system is highly regarded and we work cooperatively and well with QAA, *inter alia* jointly running a QAA and UKIPG PSRB Forum on a three times a year basis. Indeed, the first proper consideration of the White Paper was at such a Forum meeting on 15th July. Whilst everyone supports in principle the '*genuinely risk-based approach*' of paragraph 3.19, in this and in other 'Better Regulation' areas, we find the approach to quantifying and assigning the 'risk' to be poorly thought out and lacking in statistical validity. Many systems are 'risk-based' but they need to have a large amount of primary data about the whole population at risk, before one can develop reliable sampling methods. We are often challenged about risk-based approaches to professional regulation and would like to share in, and learn from, some genuine actuarial studies. We welcome the opportunity given by Para 3.22 to share this work.
19. The UKIPG shares the encouragement towards employer collaboration in HE course design and delivery, and in bringing together the various 'outcome requirements', whether they be QAA Benchmark Statements and Programme Specifications, National Occupational Standards, Graduate Output Standards of academic bodies, and the criteria for course recognition and for registration by professional bodies. They are not all meant to be the same, but they are meant to be connected to, and coordinated with, each other. There is a history of good practice in this area in several professions, from engineering to veterinary medicine.

20. The UKIPG has been involved with the Burgess work towards the Higher Education Achievement Report, including working on several occasions with the Centre for Recording Achievement. We also were involved in the work on Europass Diploma Supplements, and are keen to see these initiatives linked, and also to the current work on Modernising the RPQ Directive. We have provided an extensive input on this in response to the current Commission Green Paper, and the related study for the Commission on educational developments in EU member states being conducted GHK Consulting. We wish to see these reports strengthened and professional recognition gained by students through their courses always accurately recorded, eg in Section 5.2 of Diploma Supplements and in HEAR.

Chapter 4 – A Diverse and Responsive Sector

21. Across the UK professions, there is an understanding that HE is not just Honours and Masters Degrees, although it is accepted that it can sometimes seem that way. In a number of professional areas, there is a real contribution made by FE both directly (ie in the provision of both degree and sub-degree HE teaching close to where it is needed) and indirectly by providing education, training and qualifications which enable progression to all levels of HE. Whilst the popularity of HE in the form of HNC/D has remained high, professional bodies also embraced Foundation Degrees, once they got over their launch difficulties. UKIPG made a significant contribution to the Department's Advisory Group on Foundation Degrees several years ago.
22. Noting that the funding and support systems, as well as degree awarding powers, are planned to be opened to a wider range of providers, we have heard from some professional bodies (but not directly from current UKIPG members) that some professional bodies may be interested in taking up these options, whether as teaching organisations or as awarders of degrees. On the other hand, there is not yet any consensus among UKIPG members for the proposal to be significantly more liberal with both degree awarding powers and particularly with the 'university' title. We must always be cautious not just about the facts of a case, but of its perception, especially in the International and European area. We must not risk the world-wide reputation of UK HE, just to simplify some administrative process or to make some smaller teaching establishments seem more than what they really are.

Chapter 5 – Improved Social Mobility through Fairer Access

23. The UKIPG and its member bodies have already made a significant contribution to the Gateways to the Professions (Langlands) and Fair Access to the Professions (Milburn) projects. We recognise the importance – up till now undervalued – of a proper Careers Service. ConneXions has had to place too much emphasis (for good reasons) on NEETs to give the full attention required to all professional areas, and advice to learners is too easily moderated by the needs of their current establishment to retain student numbers. This has been a particular problem with the English administration, as we have been advised by the Institute of Careers Guidance.

24. However, the fundamental problem still lies in the School system. It should not be for HE to have to adjust to make up for the inadequacy of teaching, learning, motivation and aspiration in schools. The more it does so, the more it will encourage schools to underperform in reality, in order to achieve current low expectations, with the problems mentioned in Paragraph 5.14. We would be cautious about too much emphasis being given to 'contextual data' if it has no evidential base. It does not help anyone to be set up to fail. However, there is evidence going back to WW2 of scientifically devised selection systems being able to identify 'trainability' rather than the existing certified attainment. Ultimately, professional graduates will need all of the qualities required for full professional registration.
25. We do strongly agree with the provision of proper support for part-time students. We also believe that 'Higher Apprenticeships', with embedded HE at the right level, are 'routes to the professions' and are not helped by being dubbed 'alternative routes'. The real test of the system will be how the Smith work will provide real access to the Post Graduate (or after graduation – not the same thing) learning required for access to professions which need a true FHEQ level 7 qualification, or to those which require further directed learning and specific skills acquisition at FHEQ levels 5 and 6.

Chapter 6 – A new, fit-for-purpose' regulatory framework

26. The main points that we would wish to make on the regulatory framework have already been made earlier in this response, for example about the right level of competence for making special funding allocations, and the need for a proper scientific approach to 'risk-based regulation'. In connection with paragraph 6.19, we would ask that the HEBRG put the alleged 'burdens' placed on HEIs by PSRBs into perspective, particularly as the majority are voluntarily accepted for good business reasons. It would seem that some Government Departments and Agencies place heavier burdens, an example being the recently issued Tier 4 'Guidance' from UKBA.
27. If there are further regulatory points to make, we will do so in response to the later Technical Consultation document on this subject.

[The end]