

Response ID ANON-3YKM-V1P8-K

Submitted to **Review of post-16 qualifications at level 3 and below in England**

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Introduction

1 What is your full name?

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2 What is your email address?

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3 If you are responding on behalf of an organisation:

Please give the full name of your organisation:

British Fashion Council

What type of organisation is it?:

Representative Body or Organisation

If you have selected Other, please give details:

The British Fashion Council (BFC) is a not-for-profit organisation that aims to further the interests of the British fashion industry and its designer businesses by harnessing and sharing collective knowledge, experience and resources of the sector. Based in London and formed in 1983, the BFC is funded by industry patrons, commercial sponsors and the government including the Mayor of London, Department for International Trade (DIT) and the European Regional Development Fund. The BFC showcases the best of British fashion design to an international audience including press and buyers through London Fashion Week and London Fashion Week Men's, its biannual showcase of womenswear and menswear respectively. Each season LONDON show ROOMs takes emerging designers to Paris giving them the opportunity to promote themselves overseas. The BFC also organises the Fashion Awards, the UK's annual celebration of excellence within the industry and London Fashion Festival, a shopping event open to the public. Furthermore, the BFC helps designers at various stages of their businesses through its support initiatives. In recent years the BFC has grown our work in education and skills in order to support the nurture of talent in the UK and encourage young people to understand the wealth of career opportunities in the fashion industry. This has included the creation of the Fashion & Business Saturday Clubs, in partnership with the Saturday Club Trust, offering of scholarships at MA and BA levels, acting as secretariat for the development of the Fashion Studio Assistant Apprenticeship, and the continued development of the BFC Colleges Council, which is a network of the top 35 fashion design courses across the UK, with the aim of bringing industry closer to education.

4 What is your role, or in what capacity are you responding?

Please select from the dropdown list below:

Official or Employee

If you have selected Other Individual, please give details::

5 Do you want your answers to remain confidential?

No

Principles - Purpose and necessity

6 How could we extend this clarity of purpose to all qualifications at level 3 and below so that the intended outcome for the student is clearer?

Please give reasons for your answer, including any examples of how this may be achieved.:

The BFC concurs with the government that clarity of options for students at aged 16 is needed: As an industry, fashion is often only seen as a career in fashion design, with students, parents, teachers and career guidance failing to understand the plethora of vital non-design roles and opportunities there are in the industry from technical manufacturing through to fashion business. The BFC asks that this review is fully integrated with industry to signpost students through learning that will lead to employment. Whilst it is recognised that there is a need for government to focus the purpose of the consultation on the needs of students, the consultation does not recognise industry needs and skills gaps. In the fashion industry these are becoming particularly acute, particularly in fashion manufacturing that has an ageing workforce (48% are over 45 years of age) and a reliance on EEA works that have implications post Brexit, along with an estimate shortage of 20,000 workers (Repatriation of UK Textiles Manufacture, The Alliance Project Team).

It appears that the fundamental sole point of this review is to streamline both current and new qualification development to fall in line with the three main Post -16 training options of 'A' Level, Apprenticeships and the upcoming 'T' levels. 'T' Levels led by route coverage will address generic core skills in a wider sub-sector offer but won't necessarily give the learner the full in-depth competence to enter the workplace and further training will be needed. Not all job roles will be offered through the Apprenticeship system which will leave a void in training interventions if the relevant vocational qualifications are taken away. Therefore, we would ask that there is a fourth option through robust specialist vocational qualification training that is supported by industry. Qualifications that serve niche and in most cases specialist skills that are needed by employers but more importantly gives all 16+ learners the opportunity to access in-depth skills that will not be addressed

by the three main post-16 offers.

Principles - Purpose and necessity

7 Are standalone qualifications in personal, social and employability skills necessary?

No

Please give reasons for your answer and tell us if there are other changes we should explore to support these skills being delivered in other ways.

Please make clear if your answer varies in relation to different student groups, such as adults or those with SEND.:

The BFC supports the view of UKFT: Having reviewed many of the qualifications in this arena, UKFT believes that most of the content coverage on offer should be embedded in all mainstream qualification development that would ultimately prepare someone to progress into further vocational study or into the workplace.

All employers will be looking for new entrants to have teamwork and good work ethic and behaviours etc. but the standalone qualifications are far too generic and in most cases where sectors are mentioned it usually does not cover Fashion and Textiles.

Therefore, to have a sector specific qualification that provides learners with the introductory technical skills further supporting soft skill development that builds confidence and prepares for further progression would be of more benefit to all concerned stakeholders especially the learner.

Of course in terms of SEND then this provision would still need to be available to support and widen social mobility and life opportunities.

Principles - Progression

8 What additional evidence or data could we use to determine whether current qualifications or types of qualifications, including Applied General qualifications, are delivering successful outcomes?

Please give your answer below.:

Applied Generals are currently a very important route into higher education for fashion design. The BFC strongly believes that fashion design is not suitable to be taught through the new T Levels or through apprenticeships. The current alarming decline in art education provision in schools at GCSE and A Level, means that this route is being significantly reduced, making specialist Applied Generals an even more critical route into fashion design, leading to foundation or BA degrees, and then often into post graduate qualifications. We also ask that Applied General Qualifications are retained alongside A-levels, T levels and Apprenticeships because of:

1. An outstanding track record of progression from Level 2 to Level 3 and from Level 3 to Higher Education
2. Their demonstrable contribution to social mobility and addressing the needs of learners from disadvantaged backgrounds
3. There are significant benefits to different approaches to pedagogy and assessment for different types of learners.

The BFC asks for further conversations with government around this area.

The BFC supports the view of UKFT: It would be of benefit if the DfE consulted with industry bodies on what vocational qualifications are valued and needed to support workplace entry or further study. Vehicles such as the UKFT Industry Recognition Programme should be included in discussions as criteria has been written and approved by both AOs (members of the UKFT Awarding Organisation Forum) and the Fashion and Textiles industry. There are other sector organisations that have also implemented a similar approach.

The Applied General qualifications that include Fashion and Textiles give the first full time mainstream visible offer of the industry to young people given that there is minimal coverage at school. Historically, there were 2-year full time Fashion and Textiles solely concentrating on Fashion and Clothing or Textiles but have now been consumed into wider Applied Generals.

With the current reform to Apprenticeships in England and developments of the new 'T' Levels UKFT recommends that existing Applied Generals are reviewed to new Apprenticeship Standards / 'T' Levels in that occupational family to ensure a consistent approach to delivery and assessment. It would also be interesting to understand what role Applied Generals will play in the skills market once the full 'T' Level offer is developed with the latter being the main signposting destination for Government?

Principles - Progression

9 How could we better use data about student outcomes to monitor and assess the success of future qualifications?

Please give your answer below.:

The definition of success needs to be expanded to more than just footfall.

High student numbers on specific provision does not necessarily equate to high quality and success. And from an industry perspective the numbers taking a qualification is not a proxy of success or quality as it may be that a specialist area that only needs niche numbers in order to remain globally competitive. In an industry where companies take a global view across all areas of their business, from sourcing the perfect fabric through to finding the very best pattern cutter or embroiderer in the world to work with that fabric, niche training of very specialist craftspeople is vital.

The BFC supports the UKFT view that dependant on industry involvement, the content mapped to occupational competencies and ultimately equipping learners with the knowledge, skills and understanding to progress further should be how success is measured.

Therefore, the message across this consultation is that niche training of high-quality craftspeople is just as important as high enrolment numbers.

Principles - Quality

10 Are the quality features listed under paragraph 55 the right starting point for framing future quality requirements for publicly funded qualifications?

No

Please give reasons for your answer. :

The BFC supports the view of UKFT: The five criteria bullet points in Paragraph 55 are not dissimilar to the four criteria for industry recognition for vocational qualifications in the Fashion and Textiles industry, they are:

A minimum threshold of Guided Learning Hours (GLH) is not included as this will be set to the level of necessity of training required to become competent in the area being studied.

It appears that robust industry recognised vocational qualifications do not enter performance tables and the process is very academically led with exams being undertaken.

The Fashion and Textiles industry needs new entrants that can do the job, not talk or pass exams about it. Specialist vocational qualifications are once again being ignored and classed as a lower option, being omitted from performance tables and continues the precedent set of the non-inclusion of the creative industries in Pre-16 provision.

This has to be urgently addressed.

Principles - Quality

11 Are there certain quality features, such as size (that is, number of guided learning hours) or assessment processes that should be given particular priority?

Yes

Please give reasons for your answer and if yes, please state which features should be a priority.:

The BFC supports the view of UKFT: To put a minimum number of GLH as a benchmark would be a mistake as ideally a qualification developed would be industry driven, addresses skills gaps and supplies the crucial knowledge, skills and competence for the learner.

The size of the qualification will be set to the level of training required to become competent in the area being studied.

In March 2018 a simple search of the Ofqual Register of Regulated Qualifications website searching just the key words 'Fashion' and 'Textiles' revealed:

- 135 available qualifications across the Fashion & Textiles sector, from Entry to Higher level in England, Wales and N Ireland offered by 14 different Awarding Organisations (at least three of the 14 had never been heard of in the sector);
- 30 available qualifications offered by SQA in Scotland from SCQF level 3 to level 8 (including costume);
- A minimum of 165 qualifications offered across the UK.

The UKFT Industry Recognition Programme (IRP) ensures that qualifications are both applicable and necessary for the Fashion and Textiles industry. Significant signposting is required to assist young people, employers, parents and training providers alike in navigating the range of available courses, particularly those that address the current skills gaps within fashion and textiles.

As the Sector Skills Body, UKFT intends to review the portfolio on offer, from entry to higher level. Working collaboratively with AOs, UKFT wishes to review course provision with the intention of recognition and promotion of the high-quality qualifications that will equip candidates with the skills to progress their career.

UKFT's Industry Recognition Programme (IRP) offers a complete package; high quality qualifications which are identified, promoted and offered by fashion & textiles training providers.

At the time of this consultation there are only 17 qualifications recognised by the Fashion and Textiles industry and employers. Therefore, UKFT would urgently request to have dialogue with both the DfE and ESFA around the protection of these qualifications given that industry support them.

There should be 4 key criteria headings for quality for any qualification (as the UKFT recognition programme demands, they are :

Qualification Title (Rules of Combination / structure)

Purpose

Technical Content (Subject matter and relationship to Occupational Standards) Assessment Methods

Principles - Quality

12 Are there particular quality principles that we should consider for adults?

Yes

Please give reasons for your answer. :

As explained in Question 11 there should be 4 key criteria headings for quality for any qualification , they are:

Qualification Title (Rules of Combination / structure)

Purpose

Technical Content (Subject matter and relationship to Occupational Standards) Assessment Methods

Applying our principles - Our broader ambitions

13 At level 3, what purposes should qualifications other than T Levels or A Levels serve:

a) for 16 to 19 year olds? Please give reasons for your answer. :

The BFC supports the response of UKFT:

In the particular case of the Fashion and Textiles sector (and the wider Creative Industries) it is completely invisible in the School curriculum (Pre-16) and it is mere lip service to the industry with a very short exposure to Textiles in the D&T GCSE offer.

For fashion design the current alarming decline in art education provision in schools at GSCE and A Level, means that this route is also being significantly reduced.

For critical non-design roles the industry misses out on a huge potential pipeline of talent with school leavers misinformed and unaware of careers in the Fashion & Textiles industry.

Specific, niche job roles exist and need to be filled in the creative industries, these roles in some cases cannot be accessed until over the age of 18 (for requirements around Safeguarding and Health and Safety) and lead to self-employment therefore Level 3 provision should be both developed and endorsed by industry and made available to those 16 to 19 year olds that are not emotionally ready for full training in the work place or undertake a lengthy work placement.

Therefore, to aid social mobility, widen life choices and give the opportunity to study to enable entry into the workplace Level 3 vocational provision is needed with an industry approval.

b) for adults? Please give reasons for your answer.:

As explained above specific, niche job roles exist and need to be filled in the Fashion and Textiles sector (and wider creative industries), it is just as important for adults to be able to access Level 3 provision.

To supplement the reference to social mobility and wider life choices, adults may want to make a change in career and in some cases although may have achieved a high level of attainment and competence in a former sector will be restating the learning journey in another.

Level 3 vocational qualifications must remain available and accessible in order to support the adult workforce

Applying our principles - Our broader ambitions

14 How should we determine "overlap" in relation to:

a) overlaps with T Levels? Please give reasons for your answer.:

The BFC, with our counterparts UKFT, suggest that through consultation with industry bodies there should be a more in-depth investigation in terms of vocational qualifications and overlap as not all learners will come through the upcoming 'T' level or 'A' level programmes.

It is almost inevitable that there will be some overlap of offer but if there are fundamental differences and vocational qualifications give far more coverage and specialism than the 'T' Level in that route then further discussion is needed.

To just state that in future qualifications with overlap will not be approved for funding is wrong.

Specialist colleges and private training providers who serve craftspeople should be able to continue to offer the vocational qualifications that industry recognise and have a good track record in supplying the specialist skills needed.

b) overlaps with A Levels? Please give reasons for your answer.:

As above

Applying our principles - Our broader ambitions

15 How could post-16 qualification reform and broader study best support more people to progress directly to level 3 after key stage 4?

Please give your answer below. :

The BFC supports the view of UKFT:

As described in Question 13 the Fashion and Textiles sector has no real presence or qualification coverage in the current Pre-16 offer in schools. This gives the sector a huge problem for recruitment and is a major disadvantage to those sectors.

Therefore, there is a wider view to the question of Post-16 reform as until Pre-16 teaching truly addresses the Fashion and Textiles (and wider creative industries) there will be an urgent need and requirement for all vocational qualifications (supported by industry) from Level 1 to Level 3 to be supported as any learner wishing to explore employment opportunities in the industry will be starting from scratch and it will be the role of FE to address the failings of Pre-16 provision in

supporting the creative industries.

Applying our principles - Our broader ambitions

16 How could post-16 qualification reform and broader study best support more people to achieve at level 3?

Please give your answer below.:

As detailed in Question 15.

Applying our principles - Our broader ambitions

17 If level 2 qualifications are intended to lead directly to employment, what quality principles should apply?

Please give reasons for your answer including any examples of good practice.:

The BFC supports the view of UKFT: The Fashion and Textiles industry is facing a crucial time in terms of remaining competitive against overseas competitors and at the time of this consultation concerns around potential Brexit outcomes.

There is a chronic shortage of talent coming into the sector with many job roles remaining unfilled therefore confidence of employers in taking on skilled individuals to fill job roles at Levels 2 and 3 is of importance.

As explained throughout this consultation the need for robust, industry approved vocational qualifications is paramount.

UKFT recommends that any approval or need for vocational qualifications at any level to prepare learners to gain the relevant skills and competence is done in partnership with industry bodies and not just with Government departments (as is currently implemented through the UKFT Industry Recognition Programme).

The confidence of the employer base to offer job opportunities to learners is key. The only way to do this is for Awarding Organisations to engage with industry bodies and employers to ensure that titles, content and assessment is what is required in the workplace.

Applying our principles - Our broader ambitions

18 What are the key roles that qualifications at level 1 and below need to play?

Please give your answer below.:

The BFC supports the view of UKFT:

As explained in earlier questions the Fashion and Textiles sector currently experiences problems of qualification coverage in the Pre-16 arena.

To counteract this in-balance, the SSC responsible working in conjunction with its employer base created a Level 1 Fashion and Textiles qualification that gave learners the opportunity to experience the Fashion and Textiles sector for the first time. This was developed with ABC Awards.

This Level 1 Award and Certificate offers units for the introduction to the manufacturing skills needed to enter the job market at Level 2 concentrating on the manufacturing skills needed such as, sewing skills, lay planning, cloth cutting, pattern cutting and Health and Safety to name but a few. All key areas that are not addressed in schools.

This Level 1 qualification was used to underpin stitching schools around the country as well as being offered under a social mobility offer with some Training Providers using this Level 1 to train NEETS, long time unemployed, ex - substance dependent etc..

In some cases the attainment of this vocational qualification will be the very first accredited qualification achieved.

Funding for accessibility has severely decreased over the years and has held back greater participation and if further supported back to previous levels could be a success for all stakeholders in giving better life choices and confidence to those

The qualification has led to a bridging qualification with success in providing learners with jobs, apprenticeships or further study to Level 3 and higher technical roles in the industry.

This qualification is the only Level 1 Fashion and Textiles offer that has been recognised through the UKFT Industry Recognised Programme.

Applying our principles - Our broader ambitions

19 Are there additional principles we should apply to level 1 and below?

Yes

Please give your reasons for your answer, indicating clearly where it refers to the qualifications themselves or broader study.:

Yes, they must be supported by industry, mapped to occupational standards and give the learner the introductory skills and confidence to progress into employment or onto other industry supported provision.

Securing early progress - Pre-existing qualifications

20 Are there any additional equality impacts of withdrawing approval for funding for pre-existing qualifications that are not included in the equality impact assessment published alongside this consultation?

Yes

Please give reasons and any supporting evidence for your answer.:

UKFT supports the need for a rationalisation of vocational qualifications especially around qualifications that have multiple versions. This has historically developed from the funding rules for attainment of public funding and the QCF.

Qualifications and units had to be developed under a shared approach which meant sectors with niche numbers (such as Fashion and Textiles) were dependant on the smaller specialist AOs to develop the provision needed. Once developed other AOs could pick up the provision, re brand and enter the market at a low cost business case as all the development costs had been incurred by the original AO.

Therefore, in stealth it encouraged the mass duplication of offer which distorts the market. If qualifications are to be removed from funding the DfE must be careful that specialist AOs are not disadvantaged or put at operating risk.

The UKFT Industry Recognition Programme has already rationalised duplication of provision and has a small concise set of qualifications that industry value of which the WBL training providers in the sector seek to deliver, funding dependant.

Industry led, recognised vocational qualifications are just as important as Tech Level, Applied Generals but are again put at risk. This is a mistake and could leave a huge void in the training landscape.

Securing early progress - Qualifications with no enrolments

21 Do you agree with the proposed criteria for identifying qualifications with no enrolments?

No

Please give reasons for your answer.:

As an industry that has specialist roles that are demanded by employers, particularly in fashion manufacturing, it is essential that criteria take an industry view. The BFC therefore agrees with UKFT that although some vocational qualifications may have recorded a nil enrolment figure over the previous two years there maybe mitigating circumstances for this situation and further research and consultation will be needed with the AO and the relevant association that represents the subject area concerned.

22 Are there specific reasons that a qualification with no enrolments should remain approved for funding?

Yes

Please give reasons for your answer.:

As an industry that has specialist roles that are demanded by employers, particularly in fashion manufacturing, it is essential to consider that there may be reasons that qualifications should remain in place even if there are no enrolments as it may be vital to industry. The BFC therefore agrees with UKFT To remove funding applied to qualifications with no enrolments over the past two years in England without further investigation would be wrong and could destabilise training offers in both Wales and N.Ireland also.

Given that most qualifications approved by Ofqual in England are further offered in the Devolved Administrations an AO may feel that if the full business case for the qualification does not include funding in all nations they may look to withdraw the qualification for good.

It could also be the case that the level of funding that is currently attached to the qualification is nowhere near the level required to deliver specialist qualifications to small niche numbers and this has a detrimental effect in centre participation given the start up costs to offer specialist qualifications outweighing the small number business case scenario.

Securing early progress - Qualifications with low enrolments

23 Do you agree we should consider removing approval for funding from qualifications with low enrolments?

No

Please give reasons for your answer.:

As an industry that has specialist roles that are demanded by employers, particularly in fashion manufacturing, it is essential to consider that there may be reasons that qualifications should remain in place even if there are low enrolments as it may be vital to industry. The BFC agrees with the views of UKFT: The Fashion and Textiles sector has been repeatedly put in the position of having to defend the continuation of sector vocational qualifications and the funding attached for many many years.

The definition of low performing qualifications and the current proposal of a benchmark of less than 100 enrolments per year is fundamentally flawed.

If the current benchmark figures are continued to be used UKFT believes that all that will on offer to learners will be training in sectors such as Construction, Hair and Beauty etc. and given the lack of visibility of the wider creative industries in Pre-16 curriculum the effects of the withdrawal of funding to industry supported vocational qualifications will lead to years of destabilisation for training within the sector.

UKFT in its role as the main Trade Association for the Fashion and Textiles industry and further supported by its SSB coverage has spent considerable time over the past two years engaging with the industry and through the UKFT Awarding Organisation Forum (10 member AOs) to review the vocational portfolio.

At present there are only 17 Fashion and Textiles qualifications that have been submitted to be reviewed against the stringent criteria as set in the UKFT Industry Recognition Programme and thus are the only qualifications that are promoted as approved by industry for the industry.

UKFT have already streamlined the offer and have in stealth removed duplication of offer also where in most cases there is only one qualification per sub-sector addressing the skills and competencies needed.

24 Are there specific reasons that a qualification with low enrolments should remain approved for funding?

Yes

Please give reasons for your answer.:

The fashion industry is predominantly made up of SMEs that have little or no capacity to create or deliver their own bespoke internal training, therefore training supported by government through development and then delivery funding is vital for the collective good of the many small organisations that benefit across the industry. The BFC also supports the views of UKFT that:

In most qualifications that have been developed for the Fashion and Textiles industry there will not be the need for 100 enrolments per year as in niche specialist, artisan crafts person job roles but they are desperately needed to continue the 'Made in Britain' brand and the quality of goods exported abroad to meet the rising demand for British made goods.

The recommendation to remove funding for low enrolments needs to be reviewed as a one size fits all approach does not work. Removing such specialist vocational qualification funding at a time where T Levels are still under development (which may not address such skills in the depth required) would create a huge void for the industry.

Shaping the next stages of the review - General and equalities impact assessments

25 Do you have any comments regarding the potential impact the principles and other features outlined in this consultation may have on students from disadvantaged backgrounds, those with SEND, or others with a protected characteristic under the Equality Act 2010?

Please give reasons for your answer.:

The BFC strongly supports widening pathways into the fashion industry, and that creativity is driven by diversity. Social mobility and access to training should be for all and throughout this consultation the concentration around minimum enrolment numbers, GLH and external examinations being key criteria for funding will ultimately take away vocational qualifications at all levels.

Disadvantaged learners of those learners with SEND requirements may not be able to undertake external examinations and the emotional pressures associated but could very well be creative and have the passion and ability to produce Fashion and Textiles products or artefacts for the wider creative industries.

These learners have the right to be able to access such training that will offer social mobility, well-being and confidence needed to gain employment.

Shaping the next stages of the review - General and equalities impact assessments

26 Are there any additional impacts that you think should be included in the general impact assessment in our second stage consultation?

Yes

Please give details of any additional impacts below.:

AOs may withdraw provision as funding withdrawn.

The non-inclusion of valued and supported vocational qualifications on performance tables.

Vocational qualifications emphasis should be around doing rather than ticking academia boxes with additional external examinations