



State of the Nation Policy Briefing

Programmes and Policies

- **Rhetoric of Government** – is that skills are synonymous with further education, actual policy and programmes are more nuanced. The IfATE, which through the Skills Bill, is seeing its remit expanded and powers extended (again) refers to its role as creating a comprehensive skills system and is clear that this encompasses FE and HE. IfATE is keen to engage HEIs in the HTQ quality mark process and proposals to make occupational standards and occupational maps the bedrock of the skills system. The refresh of Degree Apprenticeship, a programme that is HE by definition, has attracted the positive attention of Number 10, the Treasury and following the Government reshuffle in 2021, both Ministers with responsibility for skills want more Degree Apprenticeships.

Michelle Donelan, in her evidence to the education select committee in November 2021 was clear that the Government wants to introduce some form of incentives to encourage universities to offer them. This was followed in late November by her direction for universities to set ambitious targets to boost the proportion of students studying degree apprenticeships, demanding them to rewrite their plans around access and participation to reduce drop-out rates with 'tough' goals in the take up of higher technical qualifications and part-time courses. Education Select Committee chair Robert Halfon has challenged the Minister to set a target of having 50 per cent of students doing degree apprenticeships. The DfE in its response said the 'reboot' of universities access and participation plans will play a 'key role' in the government's levelling up agenda. This will be the first task for John Blake who has been appointed as the new director for fair access and participation at OfS. We may need to revisit the conversation with OfS in late 2020 about our proposal to align approaches to skills, technical education, apprenticeships, and adult skills provision that maximise impact and the delivery of measurable access and participation plan outcomes. See our proposal here: https://uvac.ac.uk/wp-content/uploads/2022/01/UVAC-OfS-APP_proposal-Final-19-Nov-1.pdf

UVAC published a response in FE Week: <https://feweek.co.uk/five-ways-michelle-donelan-can-grow-degree-apprenticeships-without-a-cheque-book/> detailing five actions the minister could easily take, without getting the cheque book out that

would increase the number of Degree Apprenticeship places and the number of universities engaged in delivering provision.

- 1) **The ESFA Register of Apprenticeship Training Providers** – Minister Donelan is clear that she wants every university to offer Degree Apprenticeship. Staggeringly, the ESFA has in recent years, severally restricted the ability of universities to apply to the RoATP, an essential prerequisite to the delivery of Degree Apprenticeship. The RoATP was only reopened to new applicants, including universities, in August. Even now universities who are not on the RoATP may only apply if they fulfil a training need (a gap in provision) or have been named as a preferred provider in an employer business case. The ESFA should be instructed by Ministers to open applications to the RoATP for ALL HEIs and make clear that any successful university applicant can deliver ALL approved Degree Apprenticeships and remove current restrictions. The reapplication process to RoATP for universities should also be further simplified and streamlined.
- 2) **Commitment to the Degree Apprenticeship Programme** – Unfortunately in recent years there has been a very public debate on financial measures that should be introduced to restrict the growth of Degree Apprenticeship. Further Education representative organisations and various think tanks have proposed the introduction of age restrictions, reducing the proportion of levy funds that can be used to fund Degree Apprenticeship and proposed reducing opportunities for employers to use Degree Apprenticeship for existing staff or individuals who already have a degree. The latter proposal would mean a 25-year-old with an English degree was prevented from using a Degree Apprenticeship to train as a police officer or registered nurse. One Skills Minister floated the introduction of a starting salary eligibility cap for Apprenticeship funding. Indeed, under a former Secretary of State, the mandatory degree was removed from the Senior Leader Degree Apprenticeship. It is now no longer a Degree Apprenticeship. Such speculation and action have reduced confidence in the long-term future of Degree Apprenticeship which in some cases may have had a negative impact on the investment needed to grow provision. If they wish to grow the Degree Apprenticeship offer, Ministers must make a long-term financial commitment to their future and encourage employers and universities to invest in their long-term development.
- 3) **Recognising the Success of Degree Apprenticeship** – UVAC, like Minister Donelan believes that there should be more Degree Apprenticeships. We are, however, concerned over the apparent focus on 18/19-year-old awareness of Degree Apprenticeship. In many cases Degree Apprenticeships are most appropriate for older learners. The Police Constable Degree Apprenticeship is a case in point. The programme used mostly by older learners is supporting the professionalisation of police recruitment and training and has been used extremely successfully to recruit more women and individuals identifying as BAME. The Registered Nurse Degree Apprenticeship arguably could have the most impact on supporting individuals already working as nursing associates and assistant health practitioners to train as registered nurses. Level 7 Degree Apprenticeships (Master's degree level), that are available in around 25 occupations, are typically more appropriate for older learners. Some universities are making a dramatic success of Degree Apprenticeship. Ministers should certainly

challenge universities, but they should also celebrate the success of their Degree Apprenticeship policy. Promoting examples of success will raise the profile of and interest in Degree Apprenticeship.

- 4) **Promoting the Degree Apprenticeship Brand and Overcoming Barriers to the Growth of Degree Apprenticeship** – The IfATE’s review of Degree Apprenticeship policy provides an excellent framework to grow and ensure the long-term success of the programme. There are, however, some gaps in the review. There is little information on how the Office for Students will deliver its External Quality Assurance role for Degree Apprenticeship End Point Assessment and what universities should expect. The approach to End point Assessment and compliance with the ESFA Funding Rules also raises issues. In future, all new and revised Degree Apprenticeships will require the use of the integrated Degree Apprenticeship model. This means the Apprenticeship End Point Assessment will be delivered by the degree. This is a very sound approach. Unfortunately, the ESFA has still not explicitly outlined how the use of credit in the degree, involving guided learning, to deliver the End Point Assessment complies with their Funding Rules. Such uncertainty acts as a break on investment by universities and therefore the growth of Degree Apprenticeship. Ministers should make clear that the IfATE leads the apprenticeship agenda and instruct OfS and ESFA to ensure their systems applying to Apprenticeship support and do not impede Degree Apprenticeship growth.
- 5) **Developing a Degree Apprenticeship Growth Plan** – IfATE working with Trailblazers and the HE sector through UVAC should develop a Degree Apprenticeship Growth Plan. Such a Growth Plan, focused on skills needs and the Net Zero and Levelling Up agendas, would identify where there was the most need and potential to deliver Degree Apprenticeship. The IfATE could then work with employers and universities to bust barriers that were restricting the growth of Degree Apprenticeships.

Finally, a study on the potential impact of financial incentives for Degree Apprenticeships, particularly in areas where there are skills gaps and shortages, should be undertaken. This should also be conducted in the context of the Net Zero and Levelling Up agendas and be part of the Degree Apprenticeship Growth Plan. It may, however, be the case that any incentives/development funding to grow provision would £ for £ have a greater impact on growing Degree Apprenticeship numbers. Degree Apprenticeships, particularly integrated Degree Apprenticeships, require upfront investment in developing programmes and end point assessment systems, recruiting, and training new staff and promoting programmes to employers and learners. Ministers could find that an investment in developing university capacity, based on skills needs and employer and individual demand for Degree Apprenticeships, paid dividends.

In October, the Chair also wrote on the Board’s behalf to Ministers Donelan and Burghart setting out our asks of Government with regards to Apprenticeships, technical education, and skills priorities with the purpose of establishing a clear understanding of the role of HE in delivery. See our initial letter and Michelle Donelan’s very full response [HERE](#). Alex Burghart has also replied acknowledging UVAC’s concerns.

- **Optimising the Apprenticeship Programme** – Here ESFA colleagues are focused on implementing flexibilities, flexi-job Apprenticeships (in for example the creative and digital sectors), levy transfers to non-levy payers, raising quality (accountability, provider self-assessment and provider workforce development and provider responsiveness). Interestingly, the occupational areas where ESFA is noting unmet employer demand for Apprenticeship provision are most pronounced at levels 6 and 7. UVAC is supporting ESFA communicate such employer interest to the HE sector. Since the launch of the ESFA flexi-job apprenticeship offer in August 2021 and the release of the £7m development fund to support new agencies it is difficult to estimate the level of HE engagement or involvement. Flexi-job apprenticeships (previously known as portable apprenticeships) enable apprentices to complete their apprenticeship across multiple short employment contracts). ESFA have recently invited providers to express interest in testing a new flexi-job apprenticeships pilot scheme. The pilot will look to recruit 2,000 apprentices across 40 training providers delivering creative, digital and construction standards from April.
- **IfATE Funding Band Recommendation Review** – UVAC understands discussion by the ESFA is ongoing with the Treasury about eligible and ineligible costs of apprenticeships (indeed, progress was dependent on Spending Review discussions but there has been no consultation since) this in turn influences the IfATE approach to recommending an Apprenticeship Funding Band which has been ongoing since early 2020. While the pandemic has reduced pressure on the Apprentice budget in the medium and longer-term the debate on prioritisation will undoubtedly return. As above, the concept of the Apprenticeship Levy as a hypothecated tax is being downplayed – the apprenticeship budget is increasingly presented as a government budget line that can be increased or reduced by the Treasury. This is a longstanding review with no confirmed outcome still.
- **RoATP** – Invitations to universities to reapply to the Register picked up pace toward the end of the calendar year. There are no known causalities at this stage.
- **IfATE Degree Apprenticeship Consultation** – UVAC has worked closely with IfATE, UUK and several HEIs on the future Degree Apprenticeship model and welcomed the changes that broadly reflect the position we have been advocating for several years. Our response is available at <https://uvac.ac.uk/ifate-consultation-degree-apprenticeships-uvac-draft-response/>. At the end of December, the Institute published its (long awaited) response to the degree apprenticeships consultation.

The Institute will now implement the reforms that will lead to:

- 1) More opportunities for degrees to be included in level 6 and 7 apprenticeships.
- 2) Further integration of on and off the job training, which is a key principle of all apprenticeships.
- 3) Alignment of all degrees within apprenticeships with ‘occupational standards’ – the employer-defined knowledge, skills and behaviours that must be learned to prove occupational competency – to avoid existing degrees being re-badged as apprenticeships.
- 4) Integration of degree apprenticeship end-point assessment (EPA) with the final assessment of degrees. This means that one assessment will cover the

apprenticeship's content, be central to the degree and – where professional bodies agree – secure professional recognition too.

- 5) All integrated degree apprenticeship EPAs having to include assessment by trained individuals with appropriate occupational and industry expertise.

We and other sector representatives have received thanks for our help and advice in developing the policy and subsequent document. Whilst this feels like a milestone reached, clearly there is the small matter of implementing the policy changes still to do, and we'll now be focusing on supporting the Institute develop guidance and case studies.

The Position of Degree Apprenticeships – Despite Ministers and the IfATE support of Degree Apprenticeship three concerns remain apparent:

- **Social Mobility** – Ministers are concerned that take-up of Degree Apprenticeships disproportionately benefits the middle class. UVAC and the wider HE sector need to demonstrate the contribution of Degree Apprenticeship to social mobility, levelling up and diversity. We are seeing just one or two universities publish data on the impact of degree apprenticeships (MMU Force for Change Report launched at our national conference on 25 November: <https://www.mmu.ac.uk/media/mmuacuk/content/documents/apprenticeships/Degree-Apprenticeship-Impact-Report-2021.pdf> and Middlesex's Move On Up Survey released in February 2021 and soon to be updated <https://www.mdx.ac.uk/news/2021/02/higher-and-degree-apprenticeships>). Unlike the position some 24 months ago the place of Degree Apprenticeship in the Apprenticeship, skills and education offer is now relatively secure. Government, however, remains concerned that Degree Apprenticeship is subject to a 'middle-class grab'. The evidence from several institutions e.g., Sheffield Hallam, MMU and Middlesex is that this is not the case. UVAC continues to emphasise the message that Apprenticeship is a good choice for individuals from ALL backgrounds, supports HEIs with the social mobility and equality and inclusion agendas and calls for better and more accurate measures than Polar and IMD to be used. We have also argued that equality and diversity should be considered when monitoring participation.
- **SMEs** – Ministers are concerned about the relatively low-level take-up of Degree Apprenticeship among SMEs.
- **Affordability and Funding Bands** – The Treasury is taking a significant interest in Apprenticeship. Affordability is a medium to long-term concern for Degree Apprenticeship.

The Technical Pathway – T Levels and Higher Technical Education (HTE)/Higher Technical Qualifications (HTQs) – In its response to the second consultation Review of post 16 qualifications at level 3 in England – Approvals process for academic and technical qualifications, July 2021 Government was clear that it wants the mainstream offer for 16 – 18 year-olds to be A Levels or T Levels. There will be some opportunity for smaller Applied Generals to be combined with A levels, but this will become an exception. Applied Generals, such as BTEC Nationals and Cambridge Technicals were likely to become rare. Our view was that over time this will have a substantial impact on the recruitment of students. According to Department for Education (DfE) figures, around 200,000 16 to 18-year-old students took Applied Generals or Tech Level qualifications in 2018, over 300,000 who took A levels, and

with some students take a combination of both. Around a fifth of 18-year-old students applying to university held at least one such qualification.

UVAC has long championed the value of choice at 16 and the fact that Applied General Qualifications provide a distinctive offer and have helped many individuals, including many from underrepresented cohorts access higher education. In press articles UVAC has welcomed the fact that there would continue to be some opportunities for young people to follow Applied Generals but regretted the reduction in choice. So, we are pleased to see that the Secretary of State for Education on 15 November announced during the second reading of the Skills and Post-16 Education Bill that he is deferring plans to withdraw funding from Applied Generals until 2024. He stated:

“I am clear that T-levels and A-levels should be front and centre of the level 3 landscape, but I am convinced that we need other qualifications alongside them, many of which exist now and play a valuable role in supporting good outcomes for students. It is quite likely that many BTecs and similar applied general-style qualifications will continue to play an important role in 16-to-19 education for the foreseeable future,” said the education secretary.

He continued: “Our reforms to the qualifications landscape are rightly ambitious, but we know that we would be wrong to push too hard and risk compromising quality. That is why I am announcing today that we have decided to allow an extra year before our reform timetable is implemented. The extra year will allow us to continue to work hard to support the growth of T-levels and give more notice to providers, awarding organisations, employers, students and parents, so that they can prepare for the changes.”

Moving forward UVAC will continue to:

- Provide briefings for our members on the rollout of specific T Levels, timescales and removal of funding for other qualifications. We will, with our Awarding Organisation partners and FE partners, seek to identify where T levels are being delivered and where progression pathways can be developed.
- Work with members and Awarding Bodies to outline the value of Applied Generals in specific subject areas and where they are of value in supporting progression to higher education.
- Work with DfE/ESFA on the university approach to T levels; we assisted with the setting up of a survey in the summer for all UK universities to better understand their approach for entry for 2022.
- Maintain our involvement with the #protectstudentchoice campaign coalition of 27 organisations including: Million Plus, Guild HE, UUK, Council of Deans of Health, University Alliance, Edge Foundation, Neon.

Key issues remaining:

Whether HTQs are predominantly a Higher Education or Further Education Programme – The publicity surrounding the launch of the HTE Growth Fund was rather ‘anti-HE’ the Secretary of State commenting: “We want to counter the myth that a degree is the only way to a good job.” While the IfATE wants HEIs to apply for the HTQ Quality Mark and deliver HTQs some organisations see HTQs as more of an FE than an HE offering. UVAC has emphasised the

importance and value of degrees in the jobs market and argued for the need to create progression routes/top-ups between HTQs and bachelor's degrees.

The £18 million HTE provider growth fund announced by the Secretary of State in June 2021 appeared to pose eligibility problems for some HEIs and was seemingly more inclusive of FECs. To qualify for funding an HEI must have a good or outstanding Ofsted grade (for Apprenticeship) if inspected and of more significance to the sector be delivering level 4 and 5 technical education provision which relate to their intended HTQ offering. That is, an HEI cannot use the Growth Fund to move into level 4 and 5 technical education provision. In contrast, the fund criteria allowed for FECs delivering T levels in the same occupational areas to use the fund to expand into higher technical qualification delivery. UVAC raised this anomaly with ESFA/DfE colleagues, but no response received.

In January 2022 the names of more than 100 FE and HE providers to win a slice of the £18m 'growth fund' to invest in technical education equipment were announced. (9) Universities/HEIs who were successful as lead bidders include: Bucks New (Health and Science); Coventry University* (Digital, Construction, Health and Science); NTU (Digital, Construction); Solent (Digital, Construction, Health and Science); OU (Digital, Health and Science); Bedfordshire (Construction, Health and Science); Brighton* (Digital, Construction, Health and Science); Chester (Health and Science); Essex (Health and Science); Hertfordshire (Digital, Construction, Health and Science).

The following (5) institutions were also named as additional providers as part of IoT and Consortium applications: Sunderland; Aston; BCU; University College Birmingham; UWE.

Uncertainty over Funding – Government has made clear that it will financially disincentivise the delivery of level 4 and 5 technical qualifications that do not secure the HTQ Quality Mark. No further detail is, however, available as to what this means. Currently existing HE and FE funding and the loans system applies to HTQs. In this context it is important to note that HTQs are not a qualification, but instead a quality mark applied on successful application to existing/newly validated FHEQ and Ofqual regulated level 4 and 5 qualifications that meet the HTQ criteria. The lack of clarity on funding and uncertain demand means many HEIs are not engaging or keeping a 'watching brief' on the HTQ agenda.

Suitability and Quality of Occupational Standards – To gain IfATE approval HTQs are mapped against occupational standards. Occupational standards are developed by employer Trailblazers and originally focused on defining the knowledge, skills and behaviours developed through a work-based Apprenticeship required to be occupationally competent. Unlike Apprenticeships that are work-based, HTQs are classroom-based qualifications. Currently the IfATE is adopting a mapping process where a qualification delivers the KSBs specified in the occupational standard. Initially the focus was ensuring a threshold of 60% of the KSBs specified could be delivered by the prospective HTQ. The approach now is on the KSBs that can be developed through a classroom-based programme. Occupational standards can also vary in quality, particularly some developed in the early stages of the development of Apprenticeship standards. They can also be dated and focused on the KSBs employers believed were required when the standard was developed rather than the skills needed in the future. To address such issues the IfATE is now taking a more interventionist approach and has for example reviewed existing Occupational Standards in the context of the Net Zero and Green Jobs agenda.

Quality Assurance – IfATE will increasingly have a pivotal role in level 4 to 7 provision as the organisation responsible for Apprenticeships, technical education, Occupational Standards and Occupational Maps. Ofsted inspects all Apprenticeship training provision at levels 2 to 7. If the inspection is a 3 (requires improvement) or 4 this has implications for other parts of the HEI's delivery. OfS has said it will take an interest in a poor Ofsted inspection. As Ofsted inspects Apprenticeship provision at level 4 and 5 it is not hard to see arguments being advanced for Ofsted being instructed to inspect FHEQ Higher Technical Qualifications. Such qualifications, after all, have been mapped and approved against the KSBs specified in Occupational Standards that were originally developed for Apprenticeships. There is also a desire for Occupational Standards/IfATE Occupational Maps to inform level 6 and 7 provision. Again, in the longer-term an Ofsted role here is a possibility. Government would then have a unified quality assurance system for Apprenticeship and publicly funded/loan funded technical and professional education. OfS/QAA have shown negligible interest in developing a specific role in the quality assurance of Apprenticeship. Even where Government has directed OfS to undertake the EQA role for integrated Degree Apprenticeship little development work/consultation has been undertaken particularly in comparison with the Ofqual system for EQA for all other types of Apprenticeship.

Lack of a Standard Credit Size for a Higher Technical Qualification – HEIs offering FHEQ and Awarding Organisations with Ofqual Regulated Qualifications may apply for the HTQ Quality Mark. An FHEQ and Ofqual regulated qualification may, however, be of very different sizes as defined by credit value. A level 5 qualification may also be approved by the IfATE against a level 4 occupational standard. This means qualifications of differing credit values and different levels could be mapped and approved against the same occupational standard and awarded the IfATE Quality Mark for the same standard. A key issue here has been the difference in credit value for different HTQs and the extent to which some HTQs may support progression to a bachelor's degree. The HTQ Quality Mark does not distinguish between FHEQ and Ofqual regulated qualifications. The potential variable credit size of qualifications submitted for the HTQ quality mark and mapped against the same Occupational Standard and indeed the fact that a level 5 qualification could be mapped against a level 4 Occupational Standard does not seem to align well with the Government's desire for a national HE and FE credit system.

UVAC has joined a bid led by Middlesex with OU partnership on working with HEE to **“Create an industry standard for Accreditation of Prior Experiential Learning”**. This work could well have ongoing application for other occupations and sectors.

UVAC is asking for work to be conducted in the following areas:

- Clarification of future funding incentivisation for HTQs - DfE
- IfATE assessment of employer and learner demand for HTQs based on specific occupational standards and clarification of marketing activities - IfATE
- Review of now Occupational Standards could be developed and revised to act as an optimum specification to approve HTQs - IfATE
- Consideration of how HTQs link to and support the development of a national FE and HE credit system and support progression to and through HE particularly in the context of social mobility - UVAC

- Review of the HTQ application process - IfATE

Occupational Standards – Occupational Standards define the knowledge, skills and behaviours needed to be occupationally competent in a particular occupation. They are developed by employer led Trailblazers under the auspices of the IfATE. Originally their purpose was to act as the basis for the development of an Apprenticeship. Since their introduction their use has expanded, they act as the basis for T levels, to achieve the HTQ Quality Mark Awarding Organisations/HEIs must map a technical qualification against a standard and demonstrate it delivers the KSBs a classroom-based programme could be expected to deliver. 134 Occupational Standards have been developed at levels 6 and 7 covering a large proportion of key occupations. Unlike at levels 4 and 5, at levels 6 and 7 there has been less emphasis or incentive to use occupational standards as a basis for developing provision. In addition to the widening of their use a key trend has been greater IfATE intervention in the development and revision of occupation standards. This partly reflects the change in policy from employers being in the ‘driving seat’ to employers being at the centre of provision development. IfATE has, for example, reviewed occupational standards from the perspective of the green jobs and net zero agenda. In press articles UVAC has outlined the value of occupational standards as a flexible tool and one of several resources in supporting the development of level 6 and 7 occupational HE provision.

Occupational Maps – IfATE is being asked to consider fostering the development of new occupational standards where gaps in Occupational Maps are apparent and to support revision to meet economic and societal objectives e.g., the Green Jobs and Net Zero agenda. Occupational Maps could develop as career maps including information on wage returns and the benefits of particular options. UVAC held a consultation webinar with the IfATE on Occupational Maps at our June State of the Nation address and has provided an extensive response to the recent IfATE consultation

Lifelong Loan Entitlement, National FE and HE Credit System and the Potential for Short Courses – The Skills and Post 16 Education Bill supported the introduction of a Lifelong Loan Entitlement designed to transform the current student loans system so that adults can access a flexible loan entitlement to the equivalent of 4 years of student loans for higher-level study and training at college or university. This will allow funding to be used for short courses and underpin the introduction of a national FE and HE credit system. DfE are undertaking a number of roundtable consultations with invited stakeholders looking at customer interface; creating flexible courses; LLE ambition. The **LLE consultation** is now open available [HERE](#) with a **deadline of 6 May**.

On 25 August OfS launched the £2 million **Higher Education Short Course Trial Challenge Competition**. The trial provides funding for 22 HE providers to develop and adapt existing level 4, 5 and 6 courses into short courses (of 30 or 40 credits). Level 4 and 5 courses are to be aligned with Occupational Standards. The purpose of the fund is to test the demand for short courses and enable a new student finance offer to be tested ahead of the roll out of the Lifelong Loan Entitlement in 2025. The following HEIs were awarded funding: Coventry; DMU; Keele; Liverpool John Moores; MMU; Newcastle; Norwich University of the Arts; Sheffield Hallam; South Bank; Staffordshire; Teesside; Weston College; Chester; Essex; Leicester; Manchester; Plymouth; Roehampton; Salford; UWE; Wolverhampton; Worcester.

Wider Implications for HE – Developments in the higher-level vocational area are likely to have wider implications for higher education.

Funding – After 2 years, IfATE have launched a trial of a new methodology for determining an Apprenticeship funding band recommendation. We have always expected that Degree Apprenticeships will undoubtedly see some change. Given the new methodology will in all eventuality focus on transparency and actual costs the funding bands determined could influence the debate on other forms of Higher Education.

Quality Assurance – From 1st April 2021 all Apprenticeships including Degree Apprenticeships are subject to Ofsted inspection. While Ofsted has published extensive information and guidance on its role in providing External Quality Assurance (EQA) for Apprenticeship EPA (other than Degree Apprenticeship) OfS and QAA have been largely silent as to their approach in providing External Quality Assurance (EQA) for Degree Apprenticeship. IfATE is reviewing quality assurance arrangements for Higher Technical Qualifications, which like Degree Apprenticeships deliver the KSBs specified in Apprenticeship Standards. OfS conceded that were not able to provide an appropriate quality assurance system for Degree Apprenticeship. As with Apprenticeship quality assurance of HTQs is split between Ofqual/Ofsted (for Ofqual regulated qualifications) and OfS (for FHEQ qualifications). As above, there is the potential for Ofsted to be given an extended remit.