

HEFCE review of higher education in further education colleges

We are currently undertaking a review of the role, purpose, funding and quality assurance of higher education delivered in further education colleges. This paper summarises the main issues, key proposals from the White Paper on further education, and our current thinking. It is based on two documents discussed by the HEFCE Board: a paper submitted to the April 2006 Board meeting (Part 1), and a background briefing produced for the Board's awayday in February (Part 2).

Part 1

Background

Commitment to HE in FECs

1. Since the Dearing review at least, we and the Government have argued that HE in further education colleges (FECs) has a 'crucial role to play in the development of a higher education system that meets the growing needs of the learning society and increases the opportunities for students from disadvantaged backgrounds to participate'.¹ We continue to assert this principle in our latest strategic plan (HEFCE 2006/13) when we state in paragraph 92 that: 'We will work to strengthen HE in FECs, both to improve local access to HE and to provide opportunities for higher level learning throughout life. We will encourage close working relationships between HEIs and FECs to help expand opportunities in both HE and further education.'

2. Unfortunately, in spite of this commitment and a number of HEFCE policy initiatives over the years, the volume of HE in FECs has at best remained static and may be declining. We do not know why this is: it may be the simple result of market forces but it may be a result of some of the organisational and administrative complexities outlined below.

Current funding and organisation

3. HE in FECs operates at what is currently a funding and institutional boundary in England: it has grown up in a piecemeal way straddling FE and HE, and has rarely been the core focus of any funding body or institution. There has been a tendency for it to be neglected in mainstream strategies for HE and FE. The bulk of provision is funded by HEFCE; some (non-prescribed) HE is funded by the Learning and Skills Council (LSC).

¹ 'Funding higher education in further education colleges', HEFCE 98/59.

The LSC is responsible for FECs as institutions but not for most of their HE provision. HEFCE is essentially a purchaser of HE provision from FECs and has little influence over their strategy. HE in FECs is subject to two quality assurance regimes: the bulk of it is reviewed by the Quality Assurance Agency (QAA), while the non-prescribed HE is subject to inspection by OFSTED/ALI. FECs cannot award their own HE qualifications but must work in partnership with an awarding body, usually a higher education institution (HEI). New arrangements proposed for assuring the quality of HE in FECs would cover all HEFCE-funded HE in FECs regardless of funding route.

4. We have offered three types of funding relationship with HEFCE for HE in FECs. Many colleges have a mixture of these funding types and are sometimes in partnership with a number of HEIs, with different quality assurance regimes. The funding types are:

- a. Indirect funding, in which the student numbers belong to an HEI and are franchised to the FEC. The HEI retains responsibility for the student numbers, the curriculum, and the quality of the provision and the student experience.
- b. Direct funding, in which the FEC has a direct contract with HEFCE, which it manages itself. It can set its own fees but needs to have the curriculum validated by an awarding body, usually an HEI. The FEC has responsibility for the student numbers and the quality of the provision and the student experience but the quality of the award is the responsibility of the awarding body. We only fund full qualifications in directly funded FECs.
- c. In consortium funding, the members of the consortium enter into a partnership in which one member (usually an HEI, though this is not always the case) manages the contract with HEFCE on behalf of the others. The student numbers are shared among the consortium members and can be moved between them, while the individual members retain responsibility for the quality of the student experience. The precise nature of the relationship is determined by the consortium agreement.

5. We published advisory codes of practice for franchised and consortium arrangements in 2000 (HEFCE 00/54). Since the latter was a new funding option we included, as a drafting aid, a checklist of the requirements to cover and the terms to include in consortium agreements, and asked to see the agreements before funding through this route. Currently we do not monitor the operation of franchise or consortium agreements.

6. HEFCE's formula capital allocations, which are driven by student numbers, do not provide sufficient funds for small institutions to develop their infrastructure adequately; this includes most FECs delivering HE. Furthermore, FECs cannot access HEFCE's Strategic Development Funding (SDF) directly, though we have attempted to address these difficulties by providing funding through the SDF for HE Centres at FECs (three have been funded and two more are in development).

New pressures and challenges

7. In addition to recognising all the above organisational and funding complexities, we need to take account of the way the environment for higher education is changing. Variable fees for full-time provision are already adding strains to existing partnership arrangements between HEIs and FECs. Some partnerships work very well, others do not. This is not solely a consequence of the quality of relationships between senior managers or staff in particular institutions. FECs are dependent on HEIs for services and support and this dependency relationship can act as a constraint on partnership, and may well act as a restraint on responsiveness. The question then is – has the failure of HE in FECs to grow in the way we expected been a result of market forces, or have the administrative and structural barriers described above inhibited the capacity of FECs to develop and grow their HE to meet these policy objectives? We comment further on this below.

8. Delivering higher level skills will place new demands on both FE and HE. Our recent grant letter from the Secretary of State asked us to lead radical changes in the provision of HE by incentivising provision wholly or partly designed, funded or provided by employers. It envisaged that this might include more opportunities for part-time study and short-cycle courses, curricula that are more responsive to learner and employer demand, and a more diverse range of providers, including reinforcement of the role of FECs in delivering HE.

9. The background to new demands of this sort is that advanced technical/vocational provision at Levels 3 and 4, the borderline between FE and HE, is insufficiently developed in the UK. In respect of the HE provided by FECs, our interest is particularly in how it does now, and might in the future, contribute to the changing landscape of HE; and what it does, and might do, to enhance progression, enabling more people to access HE.

The Foster review and the FE White Paper

10. There is a wider political context also. Sir Andrew Foster's recent report into further education² underlines the importance of colleges' contribution to higher level skills, and of their links with HE through Lifelong Learning Networks (LLNs) to enhance learner progression.

11. This is echoed in the FE White Paper³. Specifically, for HE in FECs, the White Paper contains the following key sections:

2.39 FE colleges and training providers already play an important and distinctive part in HE, and within the focus on employability, there will be an important and growing role for this provision. Some 10 per cent of all HE learners are studying in FE colleges and more than 50% of them are part-time compared

² 'Realising the potential: a review of the future role of further education colleges', DfES, November 2005.

³ 'Further education: raising skills, improving life chances', DfES White Paper, March 2006.

with about 35% in HE as a whole. Some 25,000 learners in colleges are studying on Foundation Degree programmes, designed and delivered in partnership with employers, to give a strong foundation for employment in a chosen sector.

2.40 In line with the wider mission, there should be a presumption that HE delivered in FE should have a strong occupational and employment purpose. The major area of expansion will be Foundation Degrees. We will also expand work-based HE programmes. In the next chapter we set out major new proposals for FE colleges and training providers to play an important part in that, working within the Train to Gain framework to offer integrated training programmes for, and co-financed with, employers, ranging from basic skills to HE. [See section 3.17 below.]

2.41 We will also develop centres of HE excellence in FE colleges, focused on the twin themes of employability and widening participation. We have asked the Higher Education Funding Council for England (HEFCE) to treat these as high priorities for funding allocations. Equally, where colleges are not delivering to the right standard, HE provision should not continue. Not all FE colleges are well placed to deliver HE, and we will ask the HEFCE to review the effectiveness of small pockets of HE in FE colleges.

2.42 FE is particularly effective in providing HE for learners from more disadvantaged groups, backgrounds and communities. Many FE colleges offer flexible, local opportunities which make HE accessible to people who might otherwise face significant barriers to participation. The sector is well placed to promote wider participation in HE. The HEFCE has recently announced additional funding of £12 million to support widening participation in 2006-07.

2.43 We believe that FE has an important role to play in areas currently without any HE provision, and will continue to support the development of lifelong learning networks (LLNs). These combine the strengths of a number of diverse providers and allow sharing of teaching expertise, curricula and facilities. They enable learners to move between different kinds of vocational and academic programmes, and between institutions, as their interests, needs and abilities develop. There are currently ten such networks in operation, covering over 40 universities and 100 FE colleges, and expansion of LLNs will be a priority in future years. The HEFCE and the LSC will identify priority areas where provision is currently most sparse, with a view to starting LLNs in these areas by September 2008.

2.44 To ensure funding supports these developments, we have asked the HEFCE and the LSC to explore mechanisms for further capital support to enable FE providers to contribute to HE, including direct funding of HE facilities in FE colleges. We have also asked them to review the financial arrangements that underpin HE courses in FE colleges, including franchising arrangements. It is

important that money should follow the learner in ways that are transparent and build confidence.

12. The recommendation referred to in section 2.40 is as follows:

3.17 Importantly, we will also begin to offer skills development at HE level through this service. Starting in September 2006 we will extend the Train to Gain service so that employers in three pathfinder regions can meet their skill needs at Level 4 and above through Train to Gain brokers, as well as through their direct links with HE institutions. FE colleges and HE institutions, in partnership with SSCs, RDAs and employers in priority regional economic sectors, will establish new, flexible workplace focused skills provision centred on the needs of employers and employees. This will enable employees with Level 3 qualifications or below to progress to HE level qualifications. Because of the potentially high returns to employers and employees, they will be expected to contribute significantly to co-financing customised provision alongside the Government's contribution. We will monitor take-up carefully, including the impact on access to training for ethnic minorities and other groups currently under-represented in work based training.

13. This recommendation, though important in its own right, does not raise the same kinds of significant questions for our relationships with HE in FECs that the others do. It is to these questions that we now turn.

Implications of the White Paper for our review

14. The White Paper clearly marks a significant intervention. Though the proposals in its sections 2.39 to 2.44 above are the key proposals which directly impinge on us, there are others which could transform the FE landscape and therefore have an impact on our review. Clearly, while the White Paper recognises things we are already doing (supporting foundation degrees, the development of HE centres and LLNs, seeking to co-ordinate our capital funding streams with those of the LSC and other funders), it also moves the debate on. In doing so, while it is entirely consistent with the direction of our thinking and reflects earlier discussions with the DfES, the White Paper marks a significant departure from our current practice. It proposes that we should allocate additional funds to some colleges that contain centres of HE excellence and withdraw funds from others, either because they do not meet quality thresholds or, perhaps, because they offer small pockets of provision.

15. Not only would these proposals be departures from current practice, they also raise significant issues of implementation. We do not currently have specific and robust mechanisms for implementing the proposals. In particular, we do not have consistent data on the quality of HE in FECs and therefore are not able to make robust and defensible judgements about either excellence or poor standards.

16. Furthermore, the White Paper asks us to review the financial arrangements that underpin HE courses in FE colleges, including franchising arrangements. Such a review could, depending on the outcome, de-stabilise existing relationships and will certainly create a period of uncertainty for FECs and their partner HEIs.

17. Since the White Paper proposes a changed role for HEFCE in funding and managing the provision of HE in FECs, we need to seek the views of the HE and FE sectors about the proposed new approach and about mechanisms we would need to develop to implement it. We will also need to consult about the review of funding.

18. The White Paper is currently subject to consultation until 19 June and therefore we are not in a position to develop our own firm proposals on which to consult. Equally, we cannot wait until the consultation on the White Paper is finished. The proposals are already subject to much speculation and it is important, therefore, that over the same period and beyond, we should begin to explore with our stakeholders in FECs, in HEIs and, not least, with the DfES, how we might respond to the proposals and begin to implement them, as well as beginning to address the wider anomalies and complexities which our review has begun to identify.

Non-prescribed HE

19. One further issue not covered in the White Paper, though it has been the subject of informal discussion between HEFCE and the DfES, is the question of the responsibility for funding non-prescribed HE, currently funded by the LSC but at a lower rate than prescribed HE. There is a wide range of HE currently reported as 'non-prescribed', including higher level national vocational qualifications (NVQs) and qualifications awarded by professional and other awarding bodies. The Qualifications and Curriculum Authority (QCA) is in the process of recognising many of these as higher education programmes, though we only have a tentative sense of the number that will ultimately be formally designated as HE.

20. This distinction between prescribed and non-prescribed HE is an administrative anomaly which creates burden for colleges and disadvantages one form of provision relative to the other. It may also create other difficulties. We have suggested above that more intensive employer engagement might generate demands for new curricula, and this is reflected in the FE White Paper and in our grant letter. It is likely that employers will seek the development of curricula which may span the funding boundary between HEFCE and the LSC. There could be a case for bringing all higher-level programmes under the clear strategic direction of a single agency, and we believe that this issue needs further discussion with the DfES and the LSC.

Part 2

1. This paper puts into context the current HEFCE-funded provision of HE by FECs, sets out the work under way to review this provision, and makes some suggestions about what HEFCE might want to achieve by developing HE in FECs.

Background

Students and provision

2. FECs perform two main functions in HE, both of which are long-standing. Firstly, they are a major source of recruits to both full-time and part-time undergraduate education, whether provided by HEIs or FECs. Secondly, they are a setting for the delivery of HE and higher level qualifications

Students:

- 102,000 students are undertaking HEFCE-recognised HE programmes in FECs
- 49 per cent study part-time, compared to 37 per cent in an HEI
- 25 per cent of first year undergraduates in FECs are from areas with low rates of participation, compared to 19 per cent in HEIs
- 48 per cent are aged 25 or over, compared to 37 per cent in an HEI
- just over 50 per cent are male, compared to 42 per cent in an HEI – though the balance is likely to shift to a greater proportion of females as foundation degrees grow, and demand to study HND/HNCs continues to decline.

Provision:

- more than 63 per cent of students in FECs are taking sub-degree programmes, a sizable number of these being HNDs
- more than 30 per cent are following degree programmes, including foundation degrees
- just below 7 per cent are pursuing postgraduate taught programmes.

3. The most popular subjects are education, business studies and management, and creative arts and design. In HNDs/HNCs only the most popular are business studies and management, computer science, and engineering.

Institutions

4. HEFCE provides funding for HE in 290 FECs. Of these:

- 8 per cent of FECs receive HEFCE support through the direct funding route only
- 48 per cent of FECs receive indirect funding only
- 44 per cent receive HEFCE funding through direct and indirect routes.

5. In 1999-2000 HEFCE became responsible for funding prescribed HE that had previously been supported by the then Further Education Funding Council. Over the last 7 years HEFCE has encouraged colleges to collaborate with HEIs and has discouraged

small pockets of directly-funded HE provision in colleges, both to increase opportunities for a wider HE student experience and to reduce the administrative burden on colleges.

- 5 per cent of colleges have between 1000 and 4000 HE students
- 69 per cent of colleges have between 100 and 999 HE students
- 26 per cent of colleges have fewer than 100 HE students.

6. FECs account for 4 per cent of the full-time and 7 per cent of the part-time students in HE.

7. The overall statistics mask considerable variation between regions and subjects: for example FECs teach 33 per cent of all HE programmes for land-based studies in England.

Quality

8. Between 2002 and 2005 some 90 per cent of the programmes in FECs reviewed by QAA received 'confidence' judgements in respect of academic standards, and 99 per cent received 'commendable' or 'approved' judgements in respect of the quality of learning opportunities.

9. Currently it is not possible to compare the quality of directly-funded and indirectly-funded colleges because there are different review methods. This will change with the introduction of the proposed new quality assurance method.

Context

10. HEFCE is undertaking a review of its funding and support for HE in FECs, with the overall aim of developing a consistent and coherent policy on the contribution of further education colleges to HE.

11. It is timely to refine and redefine our policy in this area, against the background of changes to the student support and teaching funding regimes, and Sir Andrew Foster's report 'Realising the potential – a review of the future role of further education colleges', published in November 2005.

12. The Foster report concluded that there is a need for colleges to adopt as their primary purpose improving employability and supplying economically valuable skills. It also saw the contribution of colleges to progression and delivery of higher level skills as absolutely essential.

13. In addition, our review is prompted by a continuing concern about the insufficient development in England of advanced technical/vocational provision at Levels 3 and 4 in comparison with other countries, notably Germany and the USA. This provision exists at what is currently a funding and institutional boundary in England; it has grown up in a piecemeal way straddling FE and HE, and has rarely been the core focus of any funding body or institution. There has been a tendency for it to be neglected in mainstream strategies for HE and FE. This is not a problem just about the HE provided in FECs; rather it concerns the wider access of HE more generally. In respect of the HE provided

by FECs, our interest is particularly in how it does now, and might in the future, contribute to the changing landscape of HE; and what it does, and might do, to enhance progression, and enable more people to access HE.

14. The review is looking to address the main purpose of HE delivered in FE institutions, locating it in the wider context and developments such as foundation degrees, Lifelong Learning Networks and embedding HE in the skills agenda. We shall be developing an overarching strategy for the support of HE in FECs, taking into account:

- the role(s) FECs can play in providing HE
- possible forms of delivery
- how HE in FECs can most appropriately be delivered to meet the changing environment for both FE and HE
- the respective responsibilities of HEFCE and the LSC.

15. The recent grant letter from the Secretary of State to the Chairman of HEFCE asked the Council to lead radical changes in the provision of HE by incentivising provision wholly or partly designed, funded or provided by employers. It envisaged that this might include more opportunities for part-time study and short-cycle courses, curricula that are more responsive to learner and employer demand, and a more diverse range of providers, including reinforcement of the role of FECs in delivering HE.

Quality assurance and enhancement

16. There has been a good deal of conjecture about whether HE in FECs is 'less excellent' overall than HE in HEIs. At the moment there is no direct evidence from quality assurance data, as FECs and HEIs are currently reviewed by different methods. Similarly, there is not comparable evidence of differences between the quality of directly funded and franchised provision. Since 2001 there has been considerable activity to enhance HE provision in FECs. This includes the production of good practice guides and the provision of earmarked funding following the submission by FECs of their strategies for HE.

17. There is also a general view that the resources in FECs are not as good as those in HEIs. QAA reviews however indicated that the majority of provision is at least appropriately resourced. The QAA has noted that the best resourced HE programmes were those in colleges where the needs of HE students have been fully and strategically addressed – notably through HE teaching and learning strategies. HE delivered in FECs with CoVE status (Centre of Vocational Excellence) also benefits from associated specialist facilities. There can be problems where staff find that high class-contact hours and programme administration leaves less time for keeping abreast of current subject knowledge. Staff are however very committed; they tend to know their students well and provide a supportive environment.

18. A new review method for HE in FE is currently being developed, to begin in 2007-08. The proposed new method will allow comparability of all the HE delivered in an FEC, including directly- and indirectly-funded. A new set of teaching quality information (TQI)

data will also be developed for HE in FECs, and we hope that this can be developed to allow indirectly-funded provision to be separately identified and comparable with directly-funded provision.

Work in development

19. The following section provides a flavour of our early thinking and of the questions and challenges that we believe need to be addressed through the review. This is very much policy development at its early stage.

The purpose of HE in FECs

20. Two fundamental questions need to be addressed before considering the development of HE in FECs: what do we want HE for; and what kind of HE do we envisage in the future?

21. The purposes of HE have often been rehearsed and include personal and social returns, its civilising mission, and its contribution to economic productivity and competitiveness.

22. The existing HE system currently does not deliver everything we need in all these areas, and it is not obvious that it can do so in the future without change, because:

- HE enrolls too small a proportion of the population
- it is insufficiently socially inclusive
- it is insufficiently responsive to changing needs of the 'knowledge economy'; or at any rate, HE needs to change/adapt to meet the changing needs of an emerging knowledge economy.

23. Arguably, what many HEIs do best is to:

- build on a highly selective and still overwhelmingly academic experience of prior learning
- produce as many or more graduates per head as any comparable country, and in three years rather than four
- produce research of international excellence.

24. What HE overall currently does not do very well is to cater sufficiently for new kinds of vocationally-oriented learning, for a much more diverse learning population, and to do so over a lifetime of learning and work. Also, the development of the Skills Agenda and its application through HE provides a major challenge to the existing characteristics of supply. Traditional HE programmes, developed to be sustained over the long term, will not be suitable for delivering short-cycle, skills-based programmes and modules. Instead what is needed is HE with new characteristics, which centre on the ability to provide a rapid response to employer needs, on agility and flexibility in delivery, and on the capacity to work positively with the turbulence that is a continuing feature of the market.

25. We have already noted the need for substantial development of Levels 3 and 4 advanced technical and vocational provision, in the main closely linked to employers and workplaces, which is flexible in terms of delivery and is non-hierarchical. There have

been some important adjustments to recruitment, curriculum, and delivery, although in some institutions more than others. HEIs and FECs deliver foundation degrees, and degrees in programmes such as leisure and tourism and media studies, as well as in the more traditional HE curriculum. Arguably this has not gone far enough, and needs to go further, and to happen more quickly. In short, 'more' really does need to mean 'different'.

26. One further way in which mass HE will be genuinely different is that higher level learning will no longer be predominantly linear, e.g. from undergraduate to postgraduate. Much more learning will take place over an extended period, with individuals moving in and out of learning, and with learners moving around at the same level, or moving between levels as needs dictate.

27. Higher education needs to provide a range of learning experiences that are diverse, comprehensive, flexible, and responsive to changing needs. In other words, HE ceases to be identified so closely only with the three-year traditional undergraduate degree, for a minority of the population that succeeded at school or college. As Halsey has pointed out, with the advent of mass higher education at the end of the twentieth century, the European-wide preoccupation with educational equity has shifted from post-war concerns with entry to secondary schooling, to the selection that occurs out of secondary education.⁴ The 50 per cent target for participation in HE among 18-30 year olds reflects this ambition. Ultimately higher level learning, post-16 (or rather post Level 3) will be universally available, in many different forms and for many different purposes, across a lifetime, to all that can benefit from it.

What does HEFCE want to achieve from HE in FECs

28. A number of claims are often made about the rationale for HE provided by FECs. For example, they:

- offer convenient local access to HE, particularly where there is no HEI locally
- offer a more supportive teaching environment, with much smaller teaching groups than typically in HEIs
- provide a more socially mixed and potentially welcoming environment.

29. However, these characteristics are not necessarily an argument for locating HE in FECs; they could equally support an argument for changing HE in HEIs, in response to the need to secure a supportive environment for widening participation.

30. In addition, claims about the distinctive ethos, pedagogy and scale of learning in college settings are not entirely borne out by research; generalisations should be treated with caution. Some elements of the ethos are specific to provision in FECs, such as the size of classes in full-time HE courses; but other features can be found in both HEIs and FECs, such as the skills-based teaching required on some vocational sub-degree programmes and the types of tutor support this entails. Similarly, the contrast often drawn

⁴ Halsey, A. H. (1993) 'Trends in access and equity in higher education: Britain in international perspective', *Oxford Review of Education* vol. 19, No 2 p. 129

between research-focused lecturers in HEIs and caring teachers in FECs is far too simplistic.

31. Rather than rely on an appeal to the tradition and ethos of the FE sector, there is probably more to gain from an identity based on a distinction between short-cycle higher education in the colleges, largely but not exclusively vocational in orientation, and three-year undergraduate education in HEIs. Arguably FECs will contribute to more locally delivered vocational HE programmes which are part of high quality vocational pathways post-16. However, HEIs can and do deliver local vocational HE programmes as part of high quality vocational pathways (HNDs, foundation degrees). The question therefore is not whether colleges *can* contribute in this way, but whether we need them to.

32. We have argued above that the nature of mass HE is changing – and needs to change. That alongside long-term, stable, traditional three-year HE undergraduate provision, there is an increasing need for short-cycle, responsive and changeable HE provision. The distinctiveness of HE in FECs would seem to lie in the extent to which their focus on short-cycle HE requires them to adopt those new HE characteristics that we described above, based upon swiftness in responding to skills needs, agility and flexibility in delivery, and effective working within a turbulent market. And what distinctiveness there is in HE in FECs would appear to fit with the *particular* vision of the development of HE as such.

33. To some extent HE has been evolving in this direction anyway, and, left to itself, it may respond to the changing needs of the market. However, this ad hoc approach is unlikely to be the most effective or efficient way of achieving the changes that are challenging the nature of HE. Instead, we could build more deliberately and systematically on the patterns of provision, to encourage the development of HE that is flexible, responsive, employment focused, and informed by the workplace. Specifically, this could mean developing HE in FECs to support the changing vision of HE that will be universally available, in many different forms and for many different purposes, across a lifetime, to all that can benefit from it.

34. HEFCE's Quality Assurance, Learning and Teaching Committee (QALT) commented on the early work of this review. It advised strongly against over-prescribing a role for FECs in delivering HE, taking the view that there was a need for HE in FECs, but not for a strict division of labour, and that there was a need for HE in FECs to grow, with support from HEIs. The committee felt that an overly-rigid system of provision was likely to stifle dynamism and responsiveness, both of which were important characteristics in embracing the changing nature of HE. There was a need to tidy-up the administrative and funding arrangements, and to promote good practice in partnerships.

Different organisational models of collaborative provision

35. Colleges demonstrate a wide range of arrangements for managing their HE provision. These may operate at a broad, strategic level, with clearly defined structures, roles and responsibilities; or they may be more ad hoc arrangements, made in response to specific developments. They range from those that reflect a course-by-course

departmental relationship, to those based on a highly formalised multi-institutional partnership. They may also be regional or subject-based collaborations (for instance for initial teacher training) or partnerships formed specifically for the development and delivery of, for example, foundation degrees. Provision by mode, level and subject area also varies, often quite substantially, by region.

36. This complexity is reflected in FECs' arrangements for managing the HE they deliver. Where the volume of provision is medium or small (say, fewer than 800 full-time equivalent students) then it is usually embedded in the management structures and administration of the FEC. This volume of HE is unlikely to be sufficient to warrant staff teaching HE exclusively.

37. On the other hand, FECs with a large number of HE students (above 800 full-time equivalents) may locate their HE in a discrete centre or administrative unit with clear management responsibility for data management, strategic direction, planning and so on. However, many large providers are committed to an embedded model, which they believe ensures that subject expertise is applied to curriculum development and delivery; this supports a college culture for staff and students alike.