

## **Federation of Awarding Bodies – response to the draft strategic guidance to the Institute for Apprenticeships, January 2017**

### **Overview of the Federation of Awarding Bodies**

The Federation of Awarding Bodies is the trade association for vocational awarding organisations (AOs) with over 130 organisations in membership ranging from large generic AOs to those working in specific occupational areas, including professional bodies.

Both the Federation and our members are fully committed to supporting the quality and success of apprenticeships which we see as an effective way to ensure the development of technical skills within the workforce which are of value to the individual, employers and the economy as a whole.

A number of our members offer professional and technical qualifications which are used within the current apprenticeship frameworks. As assessment experts, many of our members have worked with trailblazer groups during the recent reforms to apprenticeships to support employers in the development of apprenticeship standards and assessment plans. 16 of the 33 organisations on the Register of Apprentice Assessment Organisations (RoAAO) are members of the Federation and many more of our members are considering applying to the RoAAO to provide end-point assessment services to support high quality apprenticeships in their sector. AOs are ideally placed to provide end-point assessment services for apprenticeships and the Federation is closely involved in the Education Training Foundation/AELP Future Apprenticeship Programme which seeks to support organisations to apply to join the RoAAO.

We therefore have a considerable interest in the future quality assurance of apprenticeships and the role and remit of the Institute of Apprenticeships and we welcome the opportunity to comment on the draft strategic guidance for the Institute.

This response is submitted on behalf of the Federation's membership following consultation with them and with the Federation's Board of Directors. However, AOs are a diverse community and our members may wish to make their own individual submissions containing their own particular perspectives and emphases, in addition to any comments forwarded to the Federation for inclusion in this overall response.

## Feedback on the draft strategic guidance to the Institute for Apprenticeships

### Overall position

The Federation supports the aims of improving the nation's productivity by creating the world's leading technical and professional skills sector, providing employers with the skilled staff they require, and employees with recognised, valued and "accredited" transferable skills through a system that is open to all and provides good value to the taxpayer.

We welcome the development of the Institute and the role it will play in ensuring the quality of apprenticeships. We believe the new organisation has the potential to add value to apprenticeships and technical education more broadly. We believe the draft strategic guidance provides a useful outline for the Institute and we are keen to engage with and support the work of the Institute as it evolves. We would, therefore, welcome some clarity on how the Institute intends to harness the assessment expertise that awarding organisations hold and ensure this is used to best effect to support the ongoing development of a high quality apprenticeship system.

The Federation would like to submit the following feedback on the draft guidance:

- **Paragraph 8-10, Operating within a broader context**

The Federation welcomes the recognition of the importance of a fully integrated technical education system and the role that the workforce and skills will play in successfully delivering the industrial strategy.

We also welcome the recognition of the impact that apprenticeships can have on social mobility. We would, however, welcome a greater focus by the Institute on monitoring access to apprenticeships by a wide range of learners across each type and level of apprenticeship. We believe it is important to ensure that apprenticeships are accessible to learners from a wide gender, ethnicity and socio-economic profile and we would welcome close monitoring and reporting of this by the Institute to ensure the social mobility agenda is being fulfilled.

The Federation understands that the Institute will have a remit for apprenticeships in England only. However, we believe the strategic guidance should make some reference to the relationship that the government would want the Institute to have with those who lead on apprenticeship policy for the devolved nations of the UK. The Federation believes that the divergence in apprenticeship policy across the 4 nations presents challenges and risks for large national employers and for learners. We would therefore welcome some assurance that the Institute will seek to establish strong strategic relationships with these agencies.

As we move towards the greater devolution of skills to local areas, it will be important to understand how the Institute will operate in conjunction with any devolution of the responsibility and budget for skills. The Federation believes the strategic guidance should make some reference to how the Institute will interface with local areas in relation to apprenticeships and skills, including the role of LEPs.

- **Paragraph 15-18, Standards development and approval**

The Federation supports the development of standards and assessment plans by groups that are predominantly made up of employers who have a deep and thorough understanding of the skills and knowledge individuals need to be fully competent in a skills job role. However, we also feel that the work of such groups can be greatly enhanced by the inclusion of an assessment expert from the outset. This will help to ensure that standards that are assessable are developed and that the assessment plans specify a valid and manageable approach to the end point assessment of apprentices. Awarding organisations have always worked with employers and in fact 2/3rds of Ofqual regulated awarding organisations are trade and professional bodies. We believe the guidance could be strengthened by making explicit reference to the value that assessment professionals can add to every stage of the development of standards and assessment plans.

Once the standards and assessment plans are developed we agree that a swift approval process should be available to ensure there are no unnecessary delays to the standards being made available for use. However, we believe the focus of the approval process must be firmly on quality and ensuring the standards and assessment plans are fully fit for purpose. Where approval cannot be given swiftly because the standard, or supporting assessment plan, is not sufficient to underpin a high quality apprenticeship and end-point assessment then we believe the Institute must be allowed to reject the standards/plans until such time as they meet the quality requirements. The preservation of a high quality system must always take precedence over the pursuit of the achievement of the 3 million target.

In terms of the requirement for an independent third party to examine standards and assessment plans, the Federation would urge the Institute to also include some form of independent 'assessment' expertise in the review process. We understand the importance of involving employers in this process but, in addition to this, expertise in assessment will be required. Using experts from the world of assessment will add value and ultimately help to ensure that the final approved assessment plans are fit for purpose. The Federation would be happy to work with the Institute to link them to the assessment expertise that currently resides within awarding organisations.

Paragraph 18 makes reference to the 15 technical education routes that the DfE is currently developing as part of the Post-16 Skills Plan implementation. It is not clear what the Institute will be

required to do in relation to any existing apprenticeship standards that do not map into the 15 routes and whether these will be withdrawn from use by the Institute?

The Federation also believes that the strategic guidance would benefit from some explicit reference to the responsibility of the Institute for the maintenance of standards to ensure they do not become out-dated and continue to fully reflect the needs of employers. Apprentices need assurance that the standards they will be working towards reflect the very latest skills and knowledge required in their chosen occupation.

- **Paragraph 19-23, Assessment**

The provision of high quality, consistent and fair external quality assurance (EQA) will be crucial to the success of apprenticeships in the future. The Federation supports the requirement to have a robust EQA process that can provide confidence to apprentices, employers and the wider public that each and every apprentice has met the standard required of them. We believe that getting this part of the system right is mission critical.

We therefore have concerns that 4 options for EQA are available without any over-arching requirements or criteria for EQA organisations to fulfil before they are classed as being eligible to carry out this role. We welcome the opportunity for the Institute to consider whether all of the current options should continue but we believe that the Institute also needs to consider how it will ensure all EQA organisations meet a consistent standard. The Federation believes that the system would be strengthened by having a single set of requirements to ensure fairness and consistency across all of the EQA organisations. We believe that Ofqual may have some useful experience to share in relation to how to regulate to achieve high standards and consistency across a number of organisations through the application of a common set of requirements.

In the current 4-options model, we are concerned that any attempt to make the EQA approach of the Institute 'distinctive from the others available' could lead to confusion and perceptions that some EQA approaches are not as robust as others. It would be concerning if the value of some apprenticeships was undermined because the EQA mechanism attached to them were perceived as being less robust than others. The Federation believes that the 4 option approach to EQA needs to be revisited and strengthened to ensure that the value of what is achieved by apprentices is not undermined by public perceptions of the 4 EQA routes. We believe that being able to show that all 4 models link back to a common set of principles or criteria will help to provide assurance that each EQA model provides an equally robust assurance of the quality of end-point assessment.

Although we understand the rationale for having the Institute included in the routes for EQA provision, this does raise a potential conflict of interest for the organisation in terms of how it will be able to take an independent view of its own EQA activities.

- **Paragraph 26 – Annual reporting and success measures**

The Federation believes that the annual reporting will be important to demonstrate that the Institute is achieving its objectives and that apprenticeships are providing the high quality technical education that learners require and deserve. We believe that it should be a government requirement (not request) that the Institute should develop and publish a series of top-level success measures/criteria that it is then required to publicly report against each year, using a transparent and consistent methodology. We believe that data on access to apprenticeships by those from different socio-economic backgrounds, genders and ethnicity should be part of the reporting criteria.

- **Paragraph 34, Overseeing a fair and open system**

The Federation particularly welcomes the recognition of the need for the Institute to have a remit for discouraging arrangements which layer costs and levels of bureaucracy into the approval of assessment organisations for apprenticeships. The Federation has been deeply concerned by the attempts made by several organisations to establish their own ‘approval’ mechanism for organisations who wish to offer end-point assessment. As the draft guidance points out, the Skills Funding Agency operates a central system for the approval of apprentice assessment organisations and this is all that is required. Any other arrangements are superfluous, costly, potentially confusing for employers and add no value whatsoever to the overall apprenticeship system.

However, the Federation would welcome the addition of further clarification in the final guidance document of what powers the Institute will have to ‘discourage behaviour’ like this and the tools it will be able to use to stop such behaviour through the fulfilment of its ‘statutory duties’. We believe the Institute needs to have the power to take a firm stance on this so that organisations that are currently adding cost, confusion and unnecessary layers of bureaucracy into the system are stopped from pursuing this method of income generation. We would also like to see the Institute taking a leading role in the communication to employers in industry sectors that any such additional layers of approval of assessment organisations are totally unnecessary, not supported by them and do not add any value to apprenticeships.

- **Other comments**

1. There is no reference made within the draft guidance to the role of the Institute in the process of procuring the technical qualifications within the 15 routes. The Federation would welcome further clarity about the strategic role the Institute will play in this aspect of the implementation of the Post-16 Skills Plan. As we move closer to the time when the remit of the Institute will be expanded to include technical education we look forward to further strategic guidance to provide further clarity on this additional area of responsibility.

2. It is not clear why some of the functions associated with apprenticeships will not sit under the Institute. For example, we believe that the intention is for the operation of the RoAAO to remain with the Skills Funding Agency (SFA). Similarly, the issuing of apprenticeship certificates for apprentice standards will sit with the SFA. We believe it would be clearer to have all apprenticeship related functions clearly within assigned to the Institute and not shared out across other agencies.
3. There is some concern within our membership that end-point assessment (EPA) may not be appropriate for some learners who just cannot cope with the pressure of a one-off high stakes assessment process. We would therefore welcome some commitment from the Institute to carrying out research into the impact EPA has on different types of learners and achievement rates.
4. There is a need for further information to clarify the requirements around the 'independence' required in the EPA process so it is clear to all parties what arrangements do and do not provide sufficient assurance of independence.

### **Further information**

Further information and clarification can be obtained from Ailin O'Cathain, Head of Policy, [ailin.ocathain@awarding.org.uk](mailto:ailin.ocathain@awarding.org.uk) or Stephen Wright, CEO, [swright@awarding.org.uk](mailto:swright@awarding.org.uk), telephone: 02037863171