

Federation of Awarding Bodies – response to the draft operational plan for the Institute for Apprenticeships, February 2017

Overview of the Federation of Awarding Bodies

The Federation of Awarding Bodies is the trade association for vocational awarding organisations (AOs) with over 146 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. 23 of the 42 organisations on the Register of Apprentice Assessment Organisations (RoAAO, January 2017 list) 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 operational plan 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 operational plan for 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 share Anthony Jenkins' view that 'apprenticeships can change lives' and our members look forward to continuing to play a vital role in the apprenticeship system.

We welcome the development of the Institute and the role it will aim to 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, once its remit is extended in 2018. We believe the draft operational plan 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 particularly welcome the focus on quality and the commitment to maintaining this focus as we work towards meeting the challenging and well-publicised 3 million target for apprenticeships in this parliament.

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

- **External Quality Assurance**

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. However, the Federation has a number of concerns about EQA and we believe this is a key area that the Institute should aim to make significant progress in within its first year. Key areas to address include:

- **A common set of standards/criteria for all EQA organisation.** Currently, the 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 believe that in the first year of operation the Institute needs to decide and publish information on how it will ensure all EQA organisations meet a consistent standard. The Federation believes that the system would be strengthened by having a single, central 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 it uses the General Conditions of Recognition to regulate across a number of different organisations to achieve consistently high standards.

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 (see above) will help to provide assurance that each EQA model provides an equally robust assurance of the quality of end-point assessment.

- **Potential conflict of interest.** 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. The transparency of the management of this potential conflict of interest should be a priority for the first year of the Institute's operation.

- **Willingness of the Institute to undertake EQA.** The Federation also believes that the Institute should aim to clarify when it will and will not be willing to conduct this EQA role in relation to a standard. A number of trailblazer groups have selected the Institute as the EQA provider, even in the absence of any articulation of what the Institute's approach will be. However, it is now not clear whether these standards will be accepted by the Institute for this EQA service. The operational plan presents the Institute as a 'last resort' for the provision of this service and we believe that the Institute should very quickly aim to clarify the situations where it will/will not accept a standard into its EQA service. If this model of EQA is not going to be available as an option for all standards, then it is important to make this clear as quickly as possible so that as new standards come on board they do not select it as their preferred EQA option. The Institute should also aim to explain how it will deal with all of the standards that have already selected it as the provider of EQA and whether it will honour these selections or seek to find other EQA options for these standards.

- **Charging for EQA services.** The draft plan indicates that the Institute will charge for its EQA services. Introducing a charging model will add more financial burden to AAOs and we believe this will act as a disincentive for organisations who are currently being encouraged to apply to enter the RoAAOs. This proposal does not seem to dovetail coherently with the efforts and government funding that are currently being invested into encouraging more organisations to join the RoAAO. Furthermore, the stated intention of the Institute to charge for EQA services is also likely to legitimise the position of other organisations that have developed bureaucratic systems and high levels of charges in this area.

- **Procurement of the EQA service.** The Federation is also concerned about the intention to commence "procurement" for the EQA service in February, we believe this function should be managed fully by the Institute and not at arms-length via a contract arrangement. It is essential

that the EQA of apprenticeships works effectively and we believe that the sub-contracting of such an important part of the system introduces a significant risk to the system.

- **Employer designed apprenticeship standards**

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 who can apply the principles of validity to the assessment plan and we welcome the proposal on page 16 of the draft plan to provide trailblazers with 'access to assessment specialists when needed'. We also believe that this assessment expertise should be available to the 15 route panels who will review and approve standards and assessment plans.

The Federation also welcomes the plan to allow the assessment plan to be developed alongside the standard and we believe that this provision, alongside the access to assessment expertise, will help to ensure that the standards that are developed are assessable and that the assessment plans specify a valid and manageable approach to the end point assessment of apprentices.

The Institute should also aim to clarify what will happen to existing apprenticeship standards that do not map into the 15 routes outlined in the post-16 Skills Plan and whether these will be withdrawn from use. Any plans to withdraw or merge standards that overlap need to be quickly communicated to the AAOs to avoid resources being invested in the development of end-point assessment mechanisms for standards that may not exist for much longer, and to avoid hesitation while potential AAOs wait to see if their standards are affected.

The Federation also believes that the operational plan should clarify how the Institute will approach the on-going updating and maintenance of standards to ensure they continue to fully reflect the needs of employers. Apprentices deserve assurance that the standards they will be working towards reflect the very latest skills and knowledge required in their chosen occupation.

- **Collaborative working with partners**

Collaborative working will be essential to ensure the apprenticeship system as a whole is effective and provides a high quality and cohesive offer to learners. The Federation would welcome the opportunity to work with the Institute and we would particularly welcome:

- a place on the Stakeholders Group which is a key group in the Institute's governance structure. Over 50% of the current (as at January 2017) approved apprentice assessment organisations (AAOs) are members of the Federation and we believe it is important for the Institute to provide a route for these organisations to have a voice on the Stakeholder Group.
- future involvement in the development of the Institute's remit in the broader technical education system.

- the Federation would be happy to offer support to the Institute's Assessment Committee. We understand that this will be attended by senior officials of the Institute. However, if the Institute would find it useful to supplement the assessment expertise of its own staff we would be very happy to identify suitable expert representatives to attend this Committee. In particular, the Federation can provide valuable input on the practical implementation of assessments.

The Federation understands that the Institute will have a remit for apprenticeships in England only. However, we believe the draft operational plan should outline the relationship that the Institute will aim 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.

- **The quality of provider or assessment organisations**

This will be a vital component of the success of the apprenticeship system and we note that page 7 of the draft plan refers to the Institute's role in advising the Skills Funding Agency (SFA) on any concerns about the quality of provider or assessment organisations. The Federation feels it is important that, in the short term, the Institute clearly articulates the nature and status of any advice it provides and the action that the SFA will be expected to take upon receipt of this advice. It is important to ensure that there is transparency in this area so that providers and assessment bodies are fully aware of the process that will be applied when the SFA is dealing with any concerns that are passed to it. We believe it is particularly important that the right to appeal against any decision regarding continued approval to be listed on either Register and the appeals process is published in the early stages of the Institute's operations. Any AAO that is listed on the Register will have invested heavily in the development of the required systems and processes to support EPA delivery. We fully support a system that fairly removes under-performing organisations from the respective registers but see it as being essential that the process is clearly articulated and fairly applied to all.

- **Apprenticeship certificate**

The draft plan outlines the role the AAO will be expected to carry out in relation to obtaining the final apprenticeship certificate. We do not agree with the assertion that the approach outlined is 'significantly simpler' and we believe this adds a significant burden to the AAOs and presents another disincentive to organisations in terms of moving into this area. This approach will add significantly to the resource requirements of an AAO and will require them to obtain and audit records from providers. We would ask that this proposed role for AAOs is revisited and we suggest that the provider, who will already hold the majority of the information required, is responsible for requesting the apprenticeship certificate once the AAO has provided confirmation that the

apprentice has successfully passed the EPA. This approach seems to us to present a leaner, more streamlined process for applying for the apprenticeship certificate.

- **Independence of EPA**

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.

- **Suitability of EPA for all learners**

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 their achievement rates. This could be included in the work that is planned to monitor individual standards and undertake route-based evaluations of multiple standards.

- **Social Mobility**

The Federation welcomes the recognition of **the impact that apprenticeships can have on social mobility**. We would, however, welcome further information about how the Institute will monitor 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 addressed. At present, the draft plan does not articulate how the Institute will monitor that apprenticeships are contributing effectively to the social mobility agenda. Page 6 of the draft plan outlines an intention to collect destination data, wage returns data, satisfaction levels and impact on skills gaps but it make no reference to analysing this data in relation to any social mobility indicators. This is an area that we believe should be addressed by the Institute as a priority.

- **The Institute as a Regulator**

Throughout the draft plan the Institute is referred to as a regulator. This raises a number of questions that the Institute should aim to address in the early stages of its operation. Perhaps the most significant of these is how the Institute will operate alongside the qualifications regulator, Ofqual, particularly in 2018 when the Institute will take on broader responsibility for technical education. Other questions that will need to be addressed include whether the Institute will be brought into the scope of the **Regulator's Code**, the **Growth Duty** and the **Business Impact Target**.

- **Leading reforms in technical education**

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 information to provide further clarity on this additional area of responsibility. We would particularly welcome clarification of:

- How the expanded role of the Institute will work alongside the role of Ofqual as the qualifications regulator for England?
- How the Institute will procure qualifications for the 15 routes and the details of the scope of the copyright it will require to be transferred to it (as referenced in the Technical and Further Education Bill, AD2A, 35, page 25).

▪ **Continuity of the Institute**

The draft plan makes a number of references to the need for sustained commitment to the Institute over many years and the aspiration for the Institute to be a 'permanent feature of the apprenticeship delivery landscape'. The Federation welcomes this aspiration. For too long, the technical education landscape has been subjected to reviews, policy change and the introduction of short-term initiatives which have hindered the image and perception of the system. The City and Guilds reports *Sense and Instability* (2014) and *Sense and Instability 2016* effectively articulate the extent and impact of these constant changes. We share the Institute's hope that it will become a long-term feature of the technical education system and we would hope that the Institute can achieve this, whilst also ensuring that it maintains its independence from Government and the Department for Education. We also look forward to working closely with the Institute to support its work in ensuring quality of apprenticeships and technical education more broadly.

Further information

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