

## **Federation of Awarding Bodies – response to the Institute for Apprenticeships Draft Quality Statement, October 2017**

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

The Federation of Awarding Bodies is the trade association for vocational and technical awarding organisations (AOs) with over 125 organisations in full membership ranging from large generic AOs to those working in specific occupational areas, including professional bodies.

Our members operate across a wide range of vocational/technical sectors and provide a range of qualifications to support learners to qualify and progress in their chosen sector. Many of our members award qualifications that form part of the apprenticeship frameworks and/or the new apprenticeship standards (where these include qualifications). In addition, approximately 20% of our full members are also on the Register of End Point Organisations (RoEPAO) to offer end-point assessment (EPA) in relation to one or more of the apprenticeship standards. We therefore have an interest in the work of the Institute and its draft quality statement.

This evidence submission is provided 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 perspectives and emphases, in addition to any comments forwarded to the Federation for inclusion in this overall response.

### **Note on the format of the Federation's draft response**

This consultation has been issued by the Institute for Apprenticeships with an on-line mechanism (only) for responses. As the Federation wishes to consult with members on its draft response we have formulated this response form for the purpose of consultation only. The text in the boxes is taken from the draft Quality Statement, the consultation questions are shown in bold and the Federation's draft response to each question is then shown.

Feedback from members will be used to amend the draft response and the final text will be submitted to the Institute via the on-line system by the deadline of 18 October 2017.

### What is an apprenticeship?

1. An apprenticeship is a job with training to industry standards. It should be in a **recognised occupation**, involve a substantial programme of **on and off-the-job training** and the apprentice's occupational competence should be tested by an **independent, end point assessment**. Apprenticeships are **employer-led**: employers set the standards, create the demand for apprentices to meet their skills needs, fund the apprenticeship and are responsible for employing and training the apprentice. But the **needs of the apprentice** are equally important: to achieve competence in a skilled occupation, which is transferable and secures long term earnings power, greater security and the capability to progress in the workplace.
2. Not all training is an apprenticeship. Work experience alone, shorter duration training for a job, attending a course, or assessing and certificating an employee who is already working in the occupation, are all positive forms of learning and accreditation at work but they are not apprenticeships.

### **Q1. Do you agree with this definition of an apprenticeship?**

The Federation agrees that the definition accurately reflects what an apprenticeship which is based on one of the apprenticeships standards is. Issues that should be given further consideration are:

- Many apprenticeships have a level applied to them, so the occupation reflected in the standard is at a stated level. This is not reflected in the definition above. As there is currently some consideration being given to linking progression from T-levels to level 3 occupations as defined in apprenticeship standards it may be useful to make some reference of level in the definition. It is also important to reflect the value of apprenticeships at all levels, from level 2 through to level 7.
- It is important that the reference to employers funding apprenticeships does not indicate in any way that apprenticeships are only for those employers who pay the levy. It is important that the role that non-levy paying employers need to play in making the system a success is fully recognised.
- The end-point assessment (EPA) is crucial in the apprenticeship process and the definition should reflect that these are 'high-quality' as well as independent. The assurance of the high quality of these EPAs is a fundamental part of the Institute's remit and should be a key area of focus for its work and allocation of resources.
- The importance of the EPA in the apprenticeship highlights the urgency of ensuring that an EPA Organisation is available for every apprenticeship standard to ensure apprentices have access to this crucial part of their apprenticeship in a timely manner. We understand that the number of standards without an EPA organisation is decreasing but we still believe that a standard should not be approved without an EPA organisation being in place.

- Although the current approach to apprenticeships does not require the inclusion of a regulated qualification the Federation believes that all apprenticeships should include regulated qualifications, awarded by regulated awarding organisations. Regulated qualifications add significant value for the apprentice and ensure that those who cannot complete the full apprenticeship, for whatever reason, can still achieve valuable recognition of the skills and knowledge they have acquired.

The recent NUS Report, [Students Shaping the Post-16 Skills Plan](#) also calls for the inclusion of 'clear, appropriate and nationally recognised qualifications' within apprenticeships. The [Industry Apprenticeship Council \(IAC\) Annual Survey 2017](#) found that the removal of mandatory qualifications from apprenticeship was opposed by 92 per cent of the apprentices surveyed and warned that there is a risk of 'creating a two-tier system' as those studying the new T-Levels will achieve a recognised formal qualification while apprentices may not. Certificated qualification achievement recognises learners' skills and knowledge in a way that is understood by employers and aids the transfer of the learner to new employers and new roles. The Federation believes it is in the interests of learners to have qualification achievement integrated throughout the apprenticeship.

**Q2. Do you agree that both the needs of the employer and the apprentice are equally important?**

- The Federation agrees that achieving the balance between the needs of employers and learners is important and it is vital that the needs of apprentices are considered just as carefully as those of employers. However, it is important to recognise that the needs of these two groups may be different and may, in some cases, be in conflict. It is therefore important that the Institute is highly effective at ensuring the right balance is struck between the two groups and for ensuring that the voice of the learner is well-represented and listened to. We refer again to the calls from the NUS in its recent report, [Students Shaping the Post-16 Skills Plan](#) for the inclusion of 'clear, appropriate and nationally recognised qualifications' within apprenticeships. Careful consideration needs to be given to points such as this to fully demonstrate that the needs of apprentices are being considered on an equal basis to the needs of employers. We hear many references to an 'employer-led' apprenticeship system but not to an 'apprentice-led' system so the balance does not yet seem to have reached a point of equilibrium.
- It is also important to ensure that the 'needs of employers' represents the needs of employers of all sizes, particularly micro businesses and SMEs, and does not represent just the needs of one large employer or a group of large employers.

### **High Quality Apprenticeships**

3. Apprenticeships are built upon:

#### **An Agreed Partnership:**

- An **employer** with the intention and capability of employing the apprentice to completion of their training and end-point assessment and securing their longer-term future
- An **apprentice** who is motivated to learn and work diligently to complete their apprenticeship
- Training and support delivered either wholly in house or on behalf of the employer by a **training provider, college or university**
- An **initial assessment** of the apprentice's prior learning and the job role, against the standard
- **An Apprenticeship Agreement and Commitment Statement** between the employer, the apprentice and the provider, which sets out the training programme and covers the points in this statement

#### **Q3. Do you agree that an initial assessment of both the apprentice and the job role against the standard should be a requirement for all apprenticeships?**

The Federation agrees that initial assessment is important to ensure that the job role will provide the apprentice with exposure to the types of knowledge and skills required successfully develop in all areas required by the apprenticeship standard. It is equally important to ensure that the apprentice is initially assessed against the standard to ensure that the apprenticeship will offer them a significant learning opportunity in areas that are new to them and they are aware of and comfortable with all areas of the standard that they will need to achieve. The assessment will need to take into account the needs of the individual apprentice to make sure they will be embarking on the most suitable and worthwhile apprenticeship for their needs.

#### **Q4. Do you agree that the Commitment Statement should contain a description of the prior learning and the job role in relation to the standard, together with a description of the training programme?**

The Federation agrees that the Commitment Statement should include this information. It is important that areas such as the training programme are laid out to ensure it is clearly established at the outset what the apprentice can expect to receive.

**Q5. What other essential content do you think should be in the Commitment Statement?**

The Commitment Statement should also make reference to the estimated length of the apprenticeship so it is clear to all parties how long they are committing for. It is important that the apprentice is supported for their whole apprenticeship and provided with ample time to learn and achieve all the requirements of the apprenticeship.

**The Occupation and Standard**

- **Entry to a recognised occupation** which can be transferred to other relevant employers and is sufficiently skilled to require employment and training of at least a year's duration with 20% of the time in off the job training
- A written **standard** approved by the Institute<sup>1</sup>, which fully defines the occupation in terms of the responsibilities and tasks involved and the skills, knowledge and behaviours required to achieve competence.

**Q6. Do you agree that apprenticeships should be based on occupations which are transferable in this way rather than on the more narrow requirements of one employer?**

The Federation believes that it is vital that an apprenticeship should provide an apprentice with competence that is transferable across different employers and different sectors. Training apprentices in the narrow requirements of one employer should not be a characteristic of the apprenticeship system and will benefit no one, other than perhaps the employer. It is important for the apprentice that the apprenticeship is the starting point of a career pathway and does not channel them down a route which ties them to one employer.

**Q7. Do you have any other suggestions as to how we could define an occupation for the purposes of apprenticeships?**

The Federation has nothing to add.

**Q8. Do you agree with the description of a standard above?**

Yes, the Federation agrees with this description.

---

<sup>1</sup> The Institute began operation in April 2017. Many standards were approved before this by the Department for Employment (and before July 2017 by the Department for Business, Innovation and Skills).

### **The Job**

- Employment in a **job** with legal and contractually acceptable terms and conditions
- The job role, together with the off the job training, provides opportunities to cover the **full occupational profile** and learning all of the skills, knowledge and behaviours required

### **Q9. Are there any further ways in which we could ensure that job roles used for apprenticeships meet the statutory terms and conditions and the requirements of the standard in terms of content?**

The Federation believes that the job role information should also include a reference to pay that an apprentice can expect to receive to ensure they are aware of their rights and not open to exploitation or gender-biased pay levels. The [All Party Parliamentary Group 2016-17 Annual Report on Apprenticeships](#) found that ‘the gender pay gap is higher in apprenticeships than in the wider workplace’.

### **The Training Programme**

- A challenging and stretching training and learning programme developed and delivered with the active involvement of the employer(s), which uses a range of **effective on and off the job training methods** as well as experience of work
- A **motivating and supportive workplace** with coaching and mentoring support for the apprentice
- **An extended period of on and off the job training** (at least twelve months duration with a minimum of 20% of the time in off the job training) which develops not only the knowledge and skills required but also the additional transferable skills<sup>2</sup> which allow an apprentice to deal with new employers, situations, problems and equipment.

### **Q10. Should the nomination of a workplace mentor or coach be required?**

Effective mentoring and coaching requires a specific skill-set. Some, but not all, workplaces invest in the development of these skills in their workforce. The Federation agrees that it would be beneficial to be able to offer all apprentices access to effective mentoring and coaching but we are concerned that if the nomination of a specific workplace mentor or coach became a requirement that it could present a barrier to smaller businesses who may not have the resources

---

<sup>2</sup> Often termed “metaskills” these are the higher order skills, which allow other skills to be used and developed. Apprenticeships are a particularly good way to develop these very important skills because of the combination of off the job training with doing, and technical with non-technical skills.

needed to offer this. Continued engagement of SMEs in apprenticeships is crucial to the success of the system and care needs to be taken to ensure that barriers are not placed in their way.

**Q11. Do you think that we should ask employer groups to develop model content for off the job training for each standard?**

Employers are well-placed to specify the skills, knowledge and understanding that they require in their workforce. They understand what their business needs and, to some extent, what it is likely to need in the future. This information is reflected in the apprenticeship standard. However, employers may not be as well placed to design training programmes and specify the content of these training programmes, especially those employers who are not large enough to support an in-house training and development team, staffed by skilled professionals.

The Federations believes that the expertise in developing off-the job training most commonly resides with the providers who offer this to apprentices (i.e. colleges and independent training providers). The development of this training content should undoubtedly be undertaken with input from the employer but we do not believe that employers are the right group to lead on the development of this aspect of the apprenticeship. Employers are experts in their own businesses and the skills they require in their workforce. Providers are experts in developing high quality training programmes to meet the need of employers. Awarding organisations are experts in developing valid assessments of knowledge, understanding and skills. The apprenticeship system needs to appreciate and respect the different areas of expertise within the system and support the relevant experts to contribute to the relevant aspects of the apprenticeships.

**End-point Assessment and Certification**

- Achievement prior to entry to end-point assessment, of the appropriate level of **English and maths**, any digital skills required and other specified components of the Apprenticeship, signed off by the employer
- **National standards** built into a **demanding independent<sup>3</sup> assessment** at the end of the apprenticeship, carried out by a registered apprenticeship assessment organisation, which meets the Institute’s requirements for quality, set out in its guidance on external quality assurance.<sup>4</sup>
- **Certification** by the Institute on completion of the whole apprenticeship. Recruiting employers and apprentices use this trusted record of employability as a licence for the occupation and to access related professional status

<sup>3</sup> Degree Apprenticeships where the Degree incorporates both the workplace and off the job training (known as “Integrated Degree Apprenticeships”) are exempt from the requirement for independence of end-point assessment.

<sup>4</sup> Four options are available for trailblazers for external quality assurance of end-point assessment: 1. Employer-led 2. Professional body-led, 3. Ofqual and 4. Institute for Apprenticeships. Integrated Degree Apprenticeships end-point assessment is quality assured by the HEFCE/OFS

**Q12. What more do you think that the Institute could do to ensure that assessment methods chosen are valid and delivered independently?**

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, the work of such groups can be greatly enhanced by the **requirement** to include an assessment expert from the outset. The amount of knowledge and understanding of assessment that is required to identify the most appropriate methods of assessment should not be underestimated. This is the expertise that resides with Awarding Organisations and this is why it would add value to more routinely involve them in the development of apprenticeship standards and assessment plans.

The Federation has noted that a number of assessment plans that are presented to Ofqual are not initially deemed to be valid. Ofqual understands assessments and validity and the Federation believes their input is valuable in ensuring the overall suitability of the EPAs that they externally quality assure. However, there is no transparency around the issue of how the Institute ensures that a trailblazer that is turned down by Ofqual does not approach another external quality assurance organisation (EQA) instead. It is also not clear whether other EQA Organisations have the same level of understanding of assessment and validity as Ofqual or whether they undertake any quality checks before they accept an EPA into their EQA system. The Federation believes that the Institute should require all EQA organisations to evidence how it will ensure the validity of the assessment methods applied to the EPAs that it will quality assure and to detail the resources and expertise it has to ensure this.

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. There are anecdotal references in the sector to employers who are setting up new 'parts' of an organisation so that one 'part' can EPA the apprentices in the other 'part' of the business. This type of arrangement raises many questions about conflict of interests and independence. It is necessary for the Institute to details the types of arrangements that are recognised as delivering independence with a rationale for why this is the case and how this will be monitored.

**Q13. Can you make any suggestions which could improve external quality assurance of end-point-assessment?**

1. The provision of high quality, consistent and fair external quality assurance (EQA) is crucial to the success of apprenticeships in the future. The Federation supports the requirement to have a robust EQA process that can provide confidence for apprentices, employers and the wider public that every apprentice has met the standard required of them. Getting this part of the system right is mission critical. The EQA system would be strengthened by having a **single, central set of requirements** to ensure fairness and consistency across all 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 different organisations to achieve consistently high standards.

2. Once established, the central set of requirements should be used to assess the EQA organisation before they are allowed to take on that role as well as monitor their on-going performance. There is currently no assessment of EQAs suitability to conduct this role. If the Institute wants to assure the quality of apprenticeships it needs to undertake some up-front evaluation to ensure that the organisations that are undertaking EQA are fit for purpose, understand their role and have the expertise and resources to undertake the role to a high standard. This is currently a high-risk area within the apprenticeship system and one which needs to be addressed as a matter of urgency.
3. **Charging for EQA services** will divert funds that should be used for the training of the apprentice and adds more financial burden to EPA organisations. This will act as a further disincentive for organisations who are currently considering whether or not to join the Register of End-Point Assessment Organisations.

#### **Quality Indicators**

4. We will use this Quality Statement as a reference point for our work on apprenticeships and we expect employers, colleges, providers and universities to use it when considering the design and quality of their own apprenticeships. We will use the statement as the basis for a Quality Strategy, which we will develop with employers, our apprentice's panel and our stakeholders.

#### **Q14. Will you use the Quality Statement in your own organisation?**

The Federation will use the Quality Statement as a reference document and we will also ensure it is circulated to our members for their information.

5. The statements under the headings in paragraph 3 will be embedded in different ways. Some: those under "The Occupation and Standard" and "End-point Assessment and Certification" require direct action by the Institute. Those under "An Agreed Partnership" and "The Job" require contractual compliance.
6. We have identified six key indicators that will enable us to measure the extent to which Apprenticeships meet the skills needs of employers and apprentices and the quality and outcomes of training for apprentices.

Apprenticeships will meet the **skills needs of employers and apprentices** by reflecting the range of occupations and skill levels in our diverse economy.

We will measure this by:

- Cumulative entry to and achievement of apprenticeships by occupation, level and age group
- The number of employers recruiting and training apprentices by size and sector

**Q15. Do you think that apprenticeship take-up should broadly reflect the make-up of the economy?**

The Federation believes that apprenticeships have the potential to address some of the skills shortage areas in the economy. We therefore agree that it would be useful for take-up to broadly reflect the needs of the economy. However, any apprenticeship is a job and an opportunity for a learner. We would not want to see opportunities being narrowed down to address only identified skills gap areas.

**Q16. What would you see as priority skill needs in terms of occupations and levels?**

The Federation believes that this information should come from robust research and statistical analysis and forecasting of the economy. This will be more reliable way to identify needs.

Apprenticeships will deliver **high quality training and outcomes for apprentices** in terms of quality, achievement and wage gain.

We will measure this by:

- Ofsted overall and apprenticeship grades/HEFCE (OfS) judgements
- Days of off-the-job training delivered to apprentices
- Ratio of apprentice completion to starts and success in end-point assessment
- Wage gain after apprenticeships

**Q17. Do you think that the indicators above are the right ones?**

The Federation has a number of observations about the draft measures, including:

- The number of days of off-the-job training is not a quality indicator. The days of training may have been sub-standard and added no value to the apprenticeship so this is not a reliable indicator of quality. As a measure, all it can tell you is the number of days and whether the 20% off-the-job training requirement has been met.
- Success in end-point assessments will only be a reliable indicator if the Institute address the current significant weakness in the system around EQA organisations. If EQA organisations are not sufficiently skilled in quality assurance then they will not be monitoring EPA properly. At

present, a high success rate at EPA stage could indicate a lack of quality in the system, because there is no assurance that EQAs are doing what they need to do to a consistent standard of EPA.

- Having a quality measure that includes success in end-point assessment could lead to some pressure in the system to increase pass rates in EPA to make the system appear to be healthy. It is important that the integrity of EPA is never subject to pressure to meet a specific level of pass rate.
- Retention by employer for 1-3 years once the apprenticeship is completed will indicate that the apprenticeship was a real job and not just a vehicle for using levy funds.

**Q18. Would you suggest any others?**

- Apprenticeship satisfaction levels, year on year.
- Employer satisfaction levels, year on year.

7. We will calculate a baseline for these indicators, gather data regularly over a period and determine any action needed. Once the indicators have bedded down, we will then consider whether we should set any associated targets.

**Q19. Do you agree that we should consider targets for these indicators after they have bedded down?**

The Federation understands why targets are attractive but is also mindful of the unintended consequences of targets. As soon as you specify that there is a 70% target on an indicator it becomes all too easy for that to become the focus, rather than the real issue that the indicator has been designed to address. We have seen the amount of time and energy that has been dedicated to debating the 'quality versus quantity' implications of the government's 3m apprenticeship target. On balance, the Federation feels that there is too high a risk that targets will be counter-productive and drive behaviour that does not benefit the apprenticeship system as a whole.

8. We intend to gather feedback from employers and apprentices initially using the existing employer and learner surveys operated by the DfE. We aim to develop both of these surveys to include feedback on meeting skills needs, occupations/standards, job roles, training programmes and end-point assessment. We will work also with the Apprenticeship Service to develop a new on-line approach to employer feedback.

**Q20. Are there any other ways in which we could get feedback on the areas covered by this Quality Statement?**

The Institute may wish to consider the benefits of engaging with membership organisations such as the Federation to undertake direct consultation with our members through a member event (which we would be happy to support and organise).

9. The Institute operates an Apprentices Panel and we see this and its wider network of apprentices as an important sounding board for all quality matters.
---

**Q21. Would you like to suggest any other ways in which we could consult and involve apprentices?**

The Federation believes that the Apprentices Panel which is part of the Institute's governance structure is best placed to address this question.

**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), telephone: 02037863171