
Federation of Awarding Bodies –response to the Welsh Government consultation on the Issuing Authority role for Welsh Apprenticeship Frameworks, March 2019

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 115 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 high quality qualifications to support learners to qualify and progress in their chosen sector. Many AOs provide qualifications that currently sit within apprenticeship frameworks in Wales. The Federation therefore has an interest in this consultation and we welcome the opportunity to respond.

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.**

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Consultation Questions

1: We would like to know your views on the effects that the future role of the Issuing Authority for issuing Apprenticeship Frameworks in Wales would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The Federation recognises the importance of the Welsh language for qualifications in Wales. Our members take a range of positive steps to support the use of the Welsh language in qualification achievement, whether these qualifications are included in apprenticeships or not.

As the issuing authority, Welsh ministers would be able to apply a consistent approach to the requirements related to the Welsh Language, across all frameworks.

Question 2: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

The Federation has no further comments.

Question 3: Should the Welsh Government undertake the power or what other options are available to ensure impartiality between the developer and the Issuing Authority roles?

The Federation agrees, in principle, that the transfer of the Issuing Authority role to Welsh Ministers has the potential to ensure there is a greater degree of impartiality in the process and ensure apprenticeships are developed to closely align with the needs of learners and the economy in Wales.

However, this is a significant undertaking and will require that sufficient expert resources are allocated within the Welsh Government to ensure it can be administered efficiently and effectively. The role and effectiveness of the Issuing Authority will impact on a number of stakeholders, including awarding bodies, and it will be vital that the Welsh Government is resourced to a level that allows it to be highly responsive, fully informed and able to make decisions in a timely, fair and transparent manner.

Some sectors will require updates to be made to apprenticeships on a more regular basis to ensure the frameworks reflect current sector needs and the Welsh Government will need to be sure it can meet the demand and offer a responsive, efficient and transparent issuing authority service.

Our members have identified that some SSC/Bs still have sufficient resource to remove the risk of conflict and also have the relevant expertise. Others have identified situations where they believe there has been a clear conflict of interest that has disadvantaged particular awarding bodies and unfairly advantaged others. Perhaps consideration should be given to taking a phased approach to this change. This would allow time for the required resources and expertise to be developed within the Welsh Government. During a phased transition, Ministers could consider how to take a more active

role in ensuring SSC/Bs assure them there is no conflict of interest. An approach that seeks to identify and prioritise frameworks for which the current approach is not working effectively would offer an opportunity to focus available government resources effectively.

Question 4: What should the process and criteria be when issuing a framework?

The Federation's members would welcome the opportunity to be involved in developing the detail of the process and criteria for issuing frameworks. Our members have significant experience of working with apprenticeships and the processes that have been used to issue frameworks. Key points to consider in developing the process are:

- The timescales for the new process to be established needs to be clearly communicated to avoid any confusion about what arrangements are in place.
- The launch of the new arrangements need to be communicated across all relevant stakeholders, including awarding bodies, to ensure there is a shared understanding of the process.
- A clear and accessible contact point needs to be communicated so all stakeholders can access information and seek clarification.
- Arrangement should be piloted before being rolled out across all apprenticeships. It will be highly disruptive and confusing if arrangements need to change significantly, multiple times.
- There will need to be clear, articulated Service Level Agreements in place which are supported by sufficient resources to ensure the SLAs are met, consistently. This needs to include an SLA on response times to ensure all stakeholder can be assured of receiving responses in a timely manner.
- There should be a clear route for stakeholders to provide feedback on the process and how they can escalate issues/concerns.

It is also important that as apprenticeships for Wales are considered that 'need' is not confused with 'demand'. In some areas the demand may be small but the need is essential and the lack of organisations currently providing skills does not necessarily mean that there is no need for an apprenticeship framework. The minister's message at the beginning of the consultation document talks about *responding to current and projected skills gap*. Creating an apprenticeship framework may encourage a provider to support the development of these skills and grow the demand over time.

Question 5: What are the expectations on the issuing authority when issuing a framework?

The issuing authority needs to ensure:

- that it consults with a range of organisations throughout the process and prior to the framework being issued
- ensures any expert panels are fully representative and include awarding body representation
- communicates to all stakeholders that a framework has been issued

- has clear version control on frameworks so all stakeholders are aware of what version an apprentice is working on
- has a clear contact point for information and clarification of matters related to the framework
- is responsive to requests for information and clarification
- is consistent in responses to queries and questions
- shares any information about the framework that might emerge from responses to queries/questions so all stakeholders can maintain the same understanding of what is required.

Question 6: What quality and compliance measures should be in place when approving certifying and issuing a framework, this includes ensuring the appropriate qualifications are included?

The key issue for our members is that there is an accessible and transparent process for selecting which qualifications will be included in frameworks.

The process should be published and made available to all relevant stakeholders. It should include information on how to apply for an existing qualification to be included in a framework, how to apply for a qualification that is in development to be included at a future date and what steps to take when a qualification within a framework needs to be updated to reflect changes in the skills/knowledge needed in the sector. The process should also make it clear what criteria a qualification needs to meet to be included in a framework, who will decide if it meets those criteria, how the decision will be made and how it will be communicated to awarding bodies. Associated timescales for applications, processing and decisions should be clearly stated.

It is vital that awarding bodies are aware of how they can apply to have a qualification included. It is also crucial that when a qualification is not accepted into a framework there is a valid reason for this which is articulated clearly to the awarding body, along with a mechanism to appeal the decision.

Any restriction on the number of qualifications that will be accepted into a framework should be clearly stated, alongside the rationale for the restriction. Restricting the qualifications available on a framework may place an additional burden on providers that currently work with a small number of awarding bodies. They may need to seek centre approval with a new awarding body, specifically to access one qualification.

Question 7: Should the Issuing Authority put in place any additional measures to ensure the framework meets the employer and learner needs?

It is important that a representative range of employers and learners are involved in framework consultation opportunities.

There is also a need to ensure that timely amendments to frameworks can be made, where a sector has developed and moved on and needs additional skills/knowledge to be reflected in the

apprenticeship framework. Having up to date frameworks will be essential to ensure employer and learner needs are met.

Awarding bodies have frequent contact with employers and learners so ensuring they are invited to share the intelligence they gather through this close contact will be beneficial.

The FAB/JCQ Wales Advisory Group meets regularly in Wales and we welcome closer links with Welsh Government representatives through that group. It offers the opportunity to share information with a range of awarding bodies in Wales and discuss emerging issues with them. Welsh Government representatives are always welcome to a place on the agenda for these meetings.

Question 8: Are there any additional comments you would like Welsh Government to be informed of in relation to this consultation?

It would be helpful to have clarity on who is on the WAAB board as this would increase confidence that there is representation from all stakeholders and that they have the appropriate experience.

It would also be useful to have clarity of where awarding bodies will be involved throughout the apprenticeship process as it is important that they are involved early and on an ongoing basis so they can contribute to the success of apprenticeship frameworks.

It would be useful to know what the intention is in relation to the types of organisations that will be framework developers and how those with a deep level of expertise in the sector will be involved in this process.

If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here: The Federation has nothing further to add.

Please respond to the consultation using the questionnaire at the back of the document and emailing the document to DfES-ApprenticeshipUnit@gov.wales by 29th March 2019