

IfATE – A public consultation on Degree Apprenticeship – Draft UVAC Response

Change 1 – Better supporting graduate-entry occupations

IfATE Proposal - We will amend our mandatory qualifications policy so that it better recognises the currency of degrees, including where there are no specific subject discipline requirements for entry to an occupation. In doing this, if they wish to, employers will be able to mandate degrees in apprenticeship standards that will be occupationally specific for graduate-entry occupations at level 6 and level 7.

- i. Do you agree or disagree with the proposal set out in ‘change 1’?

Agree.

- ii. Do you agree or disagree with the proposed evidence base (as outlined in point 1 above) on which the Institute will evaluate whether an occupation is a graduate occupation suitable for a degree apprenticeship?

Neutral.

- iii. Is there other evidence the Institute should consider in its evaluation of whether an occupation is a graduate occupation suitable for a degree apprenticeship

Yes.

*The level of employer support that can be demonstrated for the mandate of a degree within an Apprenticeship should be considered. Government has placed employers at the heart of the Apprenticeship system. **If employers can demonstrate there is a broad level of sector support (through survey evidence and/or market data and intelligence) then the Institute should be sympathetic to the employer proposal to mandate a degree, if a cross-section of HEIs can also confirm the KSBs will translate into learning outcomes at degree level.** Employer and HEI ‘evidence’ outlined below should be considered.*

HEIs validating a degree must ensure the learning outcomes of a degree are at an appropriate level in the FHEQ and adhere to OfS/QAA requirements. Supporting statements from HEIs that the KSBs in the Apprenticeship proposed would translate into learning outcomes at levels required to validate the degree should be viewed as important evidence as to the appropriateness or otherwise of mandating a degree.

The Institute states that it “will not anticipate or influence changes in the labour market by mandating degrees for occupations that do not already typically require graduate status from entrants, unless as a result of changing regulations governing the occupation.” There may, however, be other factors beyond ‘regulation’ that the Institute may need to consider. Impending technological change, resulting in different and higher skill sets and practices could be a factor but there may be other persuasive examples too. Again, employers with partner HEIs should be allowed to make such a case. Employers, in some sectors, should also be able to outline a case that inclusion of a degree could ‘professionalise’ practice in an occupation. PSRB evidence and views should carry weight and be considered too.

Similarly, evidence could be presented that inclusion of a degree could support approaches to increasing diversity in recruitment to a particular occupation or in tackling under-representation. There is evidence that in some sectors inclusion of a degree has helped attract more women and individuals from BAME backgrounds enter the occupation. If a Trailblazer and employers can demonstrate that inclusion of a degree in an Apprenticeship would help diversify recruitment and support progression into the professions by underrepresented and disadvantaged groups, we would hope that the Institute would view such evidence as contributing to the case for inclusion of a mandatory degree. Similarly, employers and HEIs could provide evidence that the inclusion of a mandatory degree will not restrict access to an occupation for disadvantaged cohorts.

- iv. Are there any reasons why you think this proposal will not achieve its intended objective?

No – we would, however, ask the IfATE to consider widening the qualitative evidence base as outlined in our response to question iii.

Change 2 – Integration of on-the-job and off-the-job training

IfATE Proposal - Degrees within a degree apprenticeship should fully integrate with the on-the-job training and development that apprentices experience in the workplace. Providers should therefore ensure that off-the-job training (the degree) complements and integrates with on-the-job experience in the workplace (provided by the employer). This expectation will inform the ways in which degree apprenticeships are developed by trailblazer groups, and we will also provide better guidance about how employers and training providers are expected to integrate training delivered on- and off-the-job. This reflects good practice already delivered in many degree apprenticeships, and we would like to make this the norm.

- v. Do you agree or disagree with the proposal set out in 'change 2'?

Agree.

- vi. Are there any reasons why you think this proposal will not achieve its intended objective?

The position of Ofsted. Ofsted's inspection process is still behind the curve on the detail of the proposed approach and developing good practice.

Positively, Ofsted is clear as to how integration of on-the-job and off-the-job learning is important in delivery of a high-quality Apprenticeship (including Degree Apprenticeship). Ofsted has, however, made clear it inspects the training and not the 'degree'. This approach is at odds with the IfATE proposal that 'degrees within a degree apprenticeship should fully integrate with the on-the-job training and development that apprentices experience in the workplace'. How the degree is used to deliver the training, assessment and KSBs specified within the Apprenticeship is central to the quality of the programme (regardless of the position of Ofsted) as will the relationship between the academic standards of the degree and quality of the training. It would appear at times that Ofsted are adopting historic approaches to inspection before quality.

Ofsted will need to amend its approach to reflect the actual requirements for the development and delivery of Degree Apprenticeship. Otherwise, we cannot see how IfATE and even more importantly employers and learners will have an assurance that the quality regime reflects the design parameters of what 'good' or 'outstanding' means for an integrated Degree Apprenticeship.

What remains unclear is the acceptance by both OfS/QAA and Ofsted that the integration of the degree and Apprenticeship is a key determinant of quality of delivery (as distinct from end point assessment) and presently neither of the organisations with key responsibility for quality seems to accept this as part of their remit.

What also remains unclear is the detail of the EQA role of OfS/QAA in integrated degree apprenticeship end point assessment. There is very little messaging from OfS/QAA as to the approach agreed and the implications and impact on HEIs.

An additional issue is how the ESFA define the 'practical learning period' within its Funding Rules (i.e., by defining it as ending at Gateway) which is impacting on the model and funding viability of delivery of the integrated degree apprenticeship. Questions must be raised about the interpretation of the legislation and therefore the effect on implementation of the integrated approach.

- vii. Are there any additional ways in which you think the objective to integrate on- and off- the-job training can be achieved?

Key to this being achieved is the strength of the partnership between the employer and training provider and the focus on how the on and off the job learning are integrated for the benefit of the employer and learner(s). Support from the provider for the workplace mentor/tutor and staff/managers supporting delivery will be critical. As will the planning and timing of the off the job learning to support and underpin on the job learning.

Practice will develop and vary between different Degree Apprenticeships. Different employers will require different approaches. Sharing and promotion of good practice across providers and employers delivering Degree Apprenticeship will pay dividends. This should be a key strand of the ESFA's proposed Apprenticeship Workforce Development Programme and the additional support provided through provider representative organisations such as UVAC.

Change 3 – Alignment between apprenticeship and KSBs and degree learning outcomes

IfATE Proposal - In support of change 2 we will require that the learning outcomes of any degree mandated in an apprenticeship standard will reflect the requirements of the occupation through alignment with the knowledge, skills and behaviours (KSBs) in the employer-specified occupational standard. As with change 2, this is already best practice in some degree apprenticeships. This will require Higher Education Institutions (HEIs) to develop and validate degrees specifically aligned to the apprenticeship standard, noting that this may already be the case for some regulated occupations.

- viii. Do you agree or disagree with the proposal set out in 'change 3'

Agree.

- ix. Are there any reasons why you think this proposal will not achieve its intended objective?

*While we agree with this proposal, we would note that in many cases the customisation of the Apprenticeship for the employer will help enhance quality and value. **There is no doubt that the degree learning outcomes must deliver the KSBs specified in the standard.** Flexibility and customisation for the employer, as long as this is also in the interests of the learner, should be encouraged and recognised.*

This proposal will require a partnership approach between Trailblazer employers and HEIs. Trailblazer will need to be composed, structured and work in a way that ensures a cross section of HEIs can advise on KSBs and how they align to learning outcomes. This will ensure the Degree Apprenticeship is appropriately designed to meet higher education standards and is deliverable nationally.

It is important that an appropriate timescale is adopted to allow this change to be implemented either going forward or as part of any Standard's review to take account of the degree validation process including alignment with an institution's academic standards.

Given the position of the quality assurance agencies we are unsure as to how IfATE intends the quality system to underpin this change. OfS/QAA has stated that it will not review degrees within a degree apprenticeship. As above the Ofsted approach to quality assurance needs to be adapted to meet the requirements of the IfATE integrated model.

- x. Are there any additional ways in which you think the objective to align the learning outcomes of the apprenticeship and degree can be secured.

Sector support, promotion of effective approaches, support materials and webinars. If the proposed DfE/ESFA Apprenticeship Workforce Development Programme is developed and delivered with a specific strand focused on Degree Apprenticeship this should help as will support from appropriate sector organisations.

Change 4 – Integration of assessment

IfATE Proposal - Changes 2 and 3 will align degree achievement and learning for occupational competence. As a result we will approve degree apprenticeships only where the end-point assessment (EPA) of occupational competence in a degree apprenticeship will integrate with the final assessment of the degree. The objective is to ensure that neither the degree nor the apprenticeship can be awarded in isolation from the other, with the EPA acting as a capstone for both.

- xi. Do you agree or disagree with the proposal set out in Change 4?

Agree.

- xii. Are there any reasons why you think this proposal will not achieve its intended objective?

Understanding and responding to the requirements of PSRBs, particularly where a licence to practise is involved will be critical to the success of the integrated model in certain occupations. We believe more consideration needs to be given to the position and requirements of PSRBs in the roll out of the changes outlined.

The sector is still largely unaware as to how the external quality assurance (EQA) role of OfS/QAA for integrated Degree Apprenticeship end point assessment will be implemented. UVAC has always supported the decision to hand the EQA role to OfS. It is, however, of critical importance that the sector is fully engaged and consulted on the model being developed and how it will be implemented. Urgent work is needed in this area.

Integration of assessment might seem simple at a first look, but the devil will be in the detail as there are potential impacts on funding and financial viability if HEIs are required to register for each standard. Couple with this, there are still several key decision-making policies under development and/or waiting to be firmed up (e.g., assessment costs etc.) and these potentially will influence this.

- xiii. Are there any additional ways in which you think the objective to integrate the assessment of degree apprenticeships can be secured?

The quality assurance system must underpin the integrated approach. As outlined in earlier points the approach taken and position adopted by OfS/QAA and particularly Ofsted MUST be fully in line with the IfATE Integrated Degree Apprenticeship model. Also the reform to funding band allocation must not render the cost of delivery unviable.

Change 5 – Participation of an independent assessor with occupational expertise

IfATE Proposal - We will require the integrated EPA of all degree apprenticeships to include assessment by trained individuals with appropriate occupational and industry expertise. All assessment panels will be required to have at least one suitable individual who is independent of the HEI. In line with existing good practice in many HEIs, this will assist with securing the occupational specificity of assessment by mitigating the potential conflict of interests present in integrated degree apprenticeship assessment and drawing in an occupational perspective.

- xiv. Do you agree or disagree with the proposal set out in 'Change 5'?

Agree. Independence from the on-programme training element is a current and entirely appropriate requirement.

- xv. Are there any reasons why you think this proposal will not achieve its intended objective?

This is a requirement for entry to the Register of End Point Assessment Organisations (RoEPAO) and assessment panels and their characteristics are determined by the apprenticeship end point assessment plan. The IfATE may wish to clarify who on the Panel should be the one suitable individual with appropriate occupational and industry expertise as not all Panel members have a direct influence over an apprentice's pass or failure (i.e., should it be the Independent End Point Assessor or could it be the employer or PSRB members for example). For certain standards there may be an issue as to capacity and securing the number of independent assessors as and when needed for a particular standard. Independent Assessors as well as having independence and occupational expertise will need higher education quality assurance expertise. We would suggest elements of ESFA's proposed Apprenticeship Workforce Development Programme focused on this issue. It could also be appropriate, especially for Apprenticeship standards where there will be significant growth and a high demand for collaborative approaches to training and recruiting independent assessors to be adopted. This could be potentially achieved by working through PSRBs or appropriate HE membership/network organisations.

A further issue to consider is whether there will be enough independent assessors. There is already a shortage in assessing EPA in some specialist areas - e.g., advanced clinical practitioners. Also, it would be useful to have clarity on who retains the right in this process.

- xvi. Are there any requirements that the Institute should lay out for the appointment of independent assessors with occupational expertise?

This should reflect existing PSRB approaches and OfS/QAA requirements in line with the external examiner system and, of course, existing RoEPAO requirements. Also, requirements should be made explicit in the apprenticeship end point assessment plan. We suggest that IfATE adopts a consistent approach to the types of suitable training/qualification being required for Independent Assessors for Degree Apprenticeships. At present each Assessment Plan can specify CAVA, A1, D32/D33 or leave it open, and in some cases require that it is held, in others only that it is being worked towards. This variation seems to reflect a lack of familiarity with relevant assessment qualifications among Trailblazer groups. In an HEI context alternative training models (such as PGCE/ PcET) might be adopted as a standard.

Implementation outline based on assumption of agreement

- xvii. Do you have any concerns or foresee any problems with the timeline as set out?

It took a considerably long time to get this consultation out so based on that, IfATE may experience some challenges in implementation given its stated assumptions. However, we would like to stress that the widescale engagement of the key stakeholders (UVAC, HEIs, employers and other representative bodies) has been a national success story - finally allowing vocational learning to be put on a par with traditional academic routes.

Impact Assessment

- xviii. Do you believe the proposed arrangements (any or all) would have a positive impact on particular groups of apprentices?

Yes.

- xix. If you answered 'yes' to question 1 above, please explain your reasoning.

We suspect that the reason why level 6 and 7 Apprenticeships without a degree have higher BAME representation concerns the occupational focus. Finance/accountancy occupations (Apprenticeships which do not include a degree) have often attracted a higher proportion of BAME applicants.

There is some initial evidence that the inclusion of a degree within an Apprenticeship have attracted more female and BAME applicants than has sometimes been the case with existing recruitment channels. The Digital Technology Solutions Professional Degree Apprenticeship has been a positive development in terms of attracting more women into tech occupations. Several Police Forces have reported that the Police Constable Degree Apprenticeship has supported forces diversify recruitment by attracting more successful applications from women and individuals identifying as BAME.

We would suggest that the impact of the inclusion of degrees within Apprenticeships and impact on widening the diversity of recruitment to specific occupations is worthy of further research and monitoring.

- xx. Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of apprentices?

No.

- xxi. If you have answered 'yes' to question 3 above, please explain your reasoning.

No. Degrees have UK and international standing and recognition.