***The Appropriateness of the Term ‘degree-level apprenticeships’ and Push by the DfE and the Institute for Apprenticeships to Remove Degrees from Apprenticeship Standards***

**Issues Raised in the Letter Sent by UVAC and HE representative organisations to the Office for Students**

As part of its 'faster and better' approach the Institute for Apprenticeships is seeking to remove degrees from Apprenticeship standards, unless required by a regulator or professional body. A key reason for this policy seems to be the Institute for Apprenticeships’ desire to establish the Apprenticeship certificate as a 'qualification'. Associated with this shift in policy is the use of the term ‘degree level apprenticeships’ by DfE to describe apprenticeships at level 6 and above that do not include a bachelors' or a masters' degree, but that are determined by the Institute for Apprenticeships/Trailblazers to be at 'degree level'.

We are writing to express our concern with this policy and its implications for and potential impact on students.  As a key role for the Office for Students is to protect student interests and as the Office for Students has, we understand, quality assurance responsibility for Apprenticeships at level 6 and 7, regardless of provider type, we would like to raise the following issues:

     Is the term 'degree level apprenticeships’ potentially miss-selling a programme that does not include and may not relate to a degree programme, particularly as degree is a protected term?

     Which organisation will determine if a ‘degree level apprenticeship’ is at degree level if it does not include either a prescribed or non-prescribed HE qualification? Will this be an Institute for Apprenticeships/employer responsibility?

     As ‘degree level apprenticeships’ are not based on credit it will be difficult to determine their size or equivalence. The minimum length of an Apprenticeship is 366 days - the minimum off-the-job learning requirement is 20%. How will progression for a student be supported to a bachelors' or masters' degree?

     If a student undertakes a ‘degree level apprenticeship’, will the student be entitled to 'top-up' to a degree? If so which organisation will be responsible for ensuring such opportunities are available and how will such a top-up be funded?

     A ‘degree level apprenticeship’ is focused on ensuring that an individual has the knowledge, skills and behaviours required to be competent in a specific occupation. We understand a priority for the Office for Students, under the Higher Education and Research Act 2017, is to ensure the long-term value and currency of an individual's higher education experience. Which organisation will ensure/oversee the development and delivery of a ‘degree level apprenticeship’ to ensure their long-term value and the value of the student experience?

    What national and international currency will ‘degree level apprenticeships’ have? Will the ‘degree level apprenticeship’ certificates 'awarded' by the Institute for Apprenticeships have international or even UK wide acceptance and will they potentially undermine the standing of degrees awarded by UK Higher Education Institutions? We note that the Institute for Apprenticeships describes its certification process in its Quality Statement in the following terms *'recruiting employers and apprentices use this trusted record of employability as a licence for the occupation and to access related professional status*.’ From the perspective of the prospective student considering a ‘degree level apprenticeship’ we would question the evidence for and appropriateness of this claim. We would also question whether it is appropriate for an organisation, such as the Institute for Apprenticeships, without degree awarding powers, to issue certificates which have been promoted explicitly as being degree level.

We know, from our extensive work with Trailblazers, that many employers value the inclusion of degrees in Apprenticeship and the quality, reputation and labour market standing of degrees, but are being told by the Institute for Apprenticeships they must not include their specification in a standard or assessment plan, unless required by a regulator or professional body.  We also know that some of our members are being encouraged by the Institute for Apprenticeships to deliver the training for an Apprenticeship without using a degree programme.

Initial research, particularly from HEFCE funded DADF projects, suggests that actual Degree Apprenticeships are opening up higher education opportunities to under-represented cohorts of learners and helping to tackle gender stereotyping in certain occupations. If, as the Institute for Apprenticeships intends, fewer degrees are used in Apprenticeships such opportunities to support social mobility could be lost.

Most of the issues outlined in this letter could be resolved if:

     The terminology originally used when degree apprenticeship was launched was retained - i.e. Degree Apprenticeship where an Apprenticeship included a bachelors’ or masters’ degree and Higher Apprenticeship incorporated apprenticeships at level 6 and 7 that did not include a bachelors’ or masters’ degree

     Employers, as the original policy intent of the Apprenticeship reforms, were allowed to specify and mandate a degree in an Apprenticeship where they saw it as of benefit to their sector and the occupation

     Given the increasing focus of employers on Apprenticeships at level 6 and 7 the Institute for Apprenticeships developed a greater understanding of higher education and a culture and ethos that embraced the contribution higher education made to the skills agenda.