



UVAC was formed in 1999 by the university sector to champion higher level vocational education. Today UVAC has ~ 90 UK university members drawn from all parts of the university sector and from across all English regions, Scotland and Wales. Through our networking, research and work with higher education institutions, employers and professional and statutory regulatory bodies (PSRBs) we have substantial knowledge of what works and what could work better in terms of supporting progression in higher level learning from technical and vocational qualifications.

**1. To what extent do you support the proposed model?**

Sadly the proposal, while well meaning, is a missed opportunity to align apprenticeships with the rest of higher education provision that the sector will regret. All home nations use credit on the basis of 1 credit being equal to 10 hours of learning and the volume of learning is the key determinant I feel. UCAS has argued that to establish an agreed credit system across all nations of the UK would require a separate working group, engagement and consultation with no guaranteed outcome and risks of delaying the overall project, and with costs that would outweigh the potential benefits! This reason put forward is a bit of a red herring. Even though duration seems attractive in terms of simplicity, the issues that many organisations have identified regarding the use of duration persist.

**2. Guidance proposed by regulators indicates that recommended duration (or credit for Scottish apprenticeships) is the best measure of size. To what extent do you support that this is the best measure of size for this purpose?**

UVAC and its members support the use of credit as this is universally understood as a measure of size and complexity of learning by higher education, and across all nations (your own proposal suggests using credit for Scottish apprenticeships). The accepted view by UCAS is that not every HE provider or university uses tariff points for the purposes of admission but to determine the size, volume and value of the apprenticeship to support access, credit is, by far, the better measure than duration.

UVAC has carried out research with its members to arrive at a model of ascribing credit to level 3 apprenticeships which addresses the issues of progression into HE more effectively. This work has been published in an academic, peer reviewed, journal, Higher Education, Skills and Work-based Learning: Bravenboer, D.W., Crawford-Lee, M. and Dunn, C. (2024), "Can you credit it? Towards a process for ascribing credit to apprenticeships in England", *Higher Education, Skills and Work-Based Learning*, Vol. ahead-of-print No. ahead-of-print. <https://doi.org/10.1108/HESWBL-09-2023-0255>

We recommend building into the work of Trailblazer Groups (TBGs) developing apprenticeship standards a clear means by which they do not only allocate a level to the standard alongside a duration, but also determine a number of credits for the apprenticeship. A key aspect of this approach is ascertaining the amount of on-the-job learning/training time so that a Total Apprenticeship Learning Hours number can be determined. This is used to determine the number of credits for each apprenticeship. TBGs could easily, retrospectively, ascribe a number of credits to level 3 apprenticeships (in the first instance) using this method.

The advantages of this approach are:

1. Credit provides a measure of the 'size' of an apprenticeship that is consistent with level 3 qualifications on the UCAS tariff.
2. It is consistent with what happens in Scotland for apprenticeships and all home nations use the same credit 'size' metric - 10 hours of learning/training per credit.
3. It is aligned with the use of credit in the forthcoming Lifelong Learning Entitlement (LLE) approach to establishing the amount or 'size' of learning undertaken.
4. Credit is a valid and reliable measure of the expectations regarding the amount of learning required. Whereas duration, is not a valid and reliable measure of the expectations regarding the amount of learning required.

Another key benefit is that level 3 apprenticeships (and all apprenticeships) can more easily gain recognition in an equivalent way to other qualifications. From a policy perspective this contributes directly to parity of esteem, support progression through levels from technical to higher technical to professional occupations and also provides a means to align with forthcoming LLE developments, which focus on quantifying learning through credit.

- 3. We have not allocated grade bands above pass to ensure fairness across all nations of the UK, as apprentices in Wales, Scotland and Northern Ireland do not have an opportunity to achieve a merit or distinction grade as English apprentices do. Do you agree with this approach?**

How can this be appropriate? It suggests that UCAS are trying to use the four nations argument both for and against challenges to its proposal. The core design of apprenticeships in England is based on achievement of at least one grade above pass and this difference in achievement is simply ignored by the proposal.

- 4. To what extent do you agree that the proposed model meets our guiding principles, as set out on page 6 of this document?**

There is nothing wrong with the guiding principles; the proposal is the challenge and could undermine progression from apprenticeships into higher education programmes. The use of academic credit provides a common currency for learning and a mechanism for quantifying achievement irrespective of where it was completed bridging the gap between formal, non-formal and informal learning opportunities. Academic credit is also a form of "market currency" which whether used for entry to HE or employment can be, an absolute measure of equivalence of learning. The UCAS proposals do not offer this absolute measure.

There are lots of pitfalls and potential inconsistency in the process suggested to ascribe UCAS tariff points, as university entry requirements differ greatly across the U.K. Such variability promotes inconsistency nationally and fails to benefit those who are seeking to progress in their careers. For example for the senior healthcare support worker apprenticeship, there are challenges in the way in which the mandatory qualification is recognised. Given it is a pass/fail qualification, the UCAS tariff points allocated would be low in comparison to other level 3 awards. It does not assist because it potentially diminishes its value and implies it is not an effective preparation for learners progressing to higher education and may lead some admission tutors, when making that comparison, to conclude that the apprenticeship is of 'less value'.

**5. Is there anything that we have not considered in this paper that you would like to share thoughts on?**

Apprenticeships when done well enable people to develop the kinds of professional and occupational learning that is perhaps at least as valuable if not more valuable than learning gained from other experiences and qualifications. I am not sure this understanding is served well by the use of duration (without the recognition of higher pass grades) or aligns well with supporting progression in and through work and in creating routes into the professions for all learners. The tariff points proposed will not tackle the persistent inequalities around access and widening participation and will not respond positively to the esoterically described 'not-traditional entrant' as it is unlikely that level 3 apprenticeships will get the appropriate recognition of the learning they have undertaken, that the value gained will not be fully articulated in a language that HE provider admission tutors and programme leaders will understand. Many apprentices completing their apprenticeship at level 3 are probably better prepared for their next step in learning than those with bags of UCAS points. The point is UCAS has set the points too low. They suggest that apprentices have made an 'ok' preparation for higher level learning rather than an 'excellent' preparation and ignore that apprentices in the job have learned skills and knowledge that is really relevant to a higher level programme. Further, there are lots of inconsistency in UCAS points – entry requirements differ greatly – and that variability will continue even if the tariff points are given. This will not benefit those who are seeking to progress their careers.

**End**