



Degree Apprenticeship Consultation - September 2021

NSSG responses to the consultation by the Institute for Apprenticeships & Technical Education

Full consultation to be found online at:

<https://www.instituteforapprenticeships.org/reviews-and-consultations/consultations/degree-apprenticeships-consultation/>

Change 1
<i>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>
i. Do you agree or disagree with the proposal set out in ‘Change 1’?
Agree. It is useful to recognise the currency of degrees and the value of graduate status per se. However, this change does not then seem to be supported by the rest of the proposals. The requirements later in the consultation to narrow down learning content entirely to the KSBs of one occupation miss the point of the wider learning inherent in a degree.
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?
Agree.
iii. Is there any other evidence the Institute should consider in its evaluation of whether an occupation is a graduate occupation suitable for a degree apprenticeship? Please note if any suggestions made are specific to a sector or occupational route.
Yes: this should be supplemented by reference to recruitment advertisements and consultation with Trailblazer group employer members. The Nuclear Workforce Assessments produced by the Nuclear Skills Strategy Group provide information on qualification levels and do not solely rely on SOC codes which are often not relevant to the nuclear sector.
iv. Are there any reasons why you think this proposal will not achieve its intended objective?
Yes. Later proposals to restrict learning to the KSBs of an individual occupation are likely to stop this proposal from achieving its intended objective.

Change 2
<i>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.</i>
v. Do you agree or disagree with the proposal set out in ‘Change 2’?
Disagree.
vi. Are there any reasons why you think this proposal will not achieve its intended objective?
Yes. The proposal requires that the degree is defined by the apprenticeship Standard. This narrow degrees in apprenticeships by branding them ‘occupational degrees’, which risks damaging the standing and credibility of degree apprenticeships and creating a 2-tier degree system.
One of the fundamental reasons why nuclear employers have welcomed degree apprenticeships is that they provide a route for the learner to have a degree of equal standing and worth as a fulltime student, with extensive knowledge and academic rigour.
Apprentices will also make their career choices along these lines, and are unlikely to see the same attraction if they cannot achieve the same degree through this route.
vii. Are there any additional ways in which you think the objective to integrate on- and off the-job training can be achieved?
Yes. This can be achieved by good relationships between providers and employers, with mutual adaptation on on- and off-the-job learning. Wider learning in a degree does help individuals to achieve more well-rounded competence that might not be included in the essential requirements of one particular occupation.
Change 3
<i>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</i>

viii. Do you agree or disagree with the proposal set out in 'Change 3'?
Disagree.
ix. Are there any reasons why you think this proposal will not achieve its intended objective?
<p>Yes. The proposal removes the flexibility for employers and apprentices to choose degrees that are relevant but not narrowly defined to a single occupational apprenticeship Standard. The value of degrees is well-established and well-understood in the nuclear sector, partly because of the wider understanding of technical areas that they provide. Graduate level roles relate not to a specific occupation but to the development of a strong broad technical or scientific educational foundation and a wider skillset such as critical reasoning and analytical skills that prepare a graduate for a career in the industry rather than just an initial job. A system that only allows integrated, narrowly-defined "occupational degrees" will have two tiers and devalue degree apprenticeships across the workforce.</p> <p>This is particularly important in areas such as the nuclear sector where scientific and technological innovation is key to our success. Narrowing down learning content is unlikely to encourage the innovative thinking and wider understanding that is critical if people are to contribute to these cutting-edge developments.</p> <p>The proposals require universities to design and deliver a whole range of separate degrees alongside their full-time academic provision. This will inevitably require significant development cost (for which there is no funding), and loss of economies of scale in delivery. This would likely reduce the availability of provision.</p> <p>The proposal runs counter to one of the principles in the apprenticeship reforms of the past few years since the Richard Review, which is that providers should be 'freed up' to encourage innovation in delivery rather than being required to deliver a prescribed curriculum, providing that ultimately the learner arrives at occupational competence.</p>
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?
Yes. The current system of allowing non-integrated degree apprenticeships does already provide for the alignment of learning outcomes of the apprenticeship and the degree, in that the wider learning helps the apprentice to become a well-rounded competent employee.
Change 4
<i>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.</i>

xi. Do you agree or disagree with the proposal set out in 'Change 4'?
Disagree
xii. Are there any reasons why you think this proposal will not achieve its intended objective?
<p>Yes. Full integration of assessment will remove the flexibility to have non-integrated apprenticeships, which devalues degree apprenticeships for the reasons set out in our answers regarding the other proposals.</p> <p>Integration also means that the university provider does not have the independence of assessment that is another key principle of the reformed apprenticeship system.</p>
xiii. Are there any additional ways in which you think the objective to integrate the assessment of degree apprenticeships can be secured?
Yes. End Point Assessment Plans can be written so as to require the assessment of practical competence before the completion of the degree element, so as to encourage completion of the whole assessment.
Change 5
<i>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.</i>
xiv. Do you agree or disagree with the proposal set out in 'Change 5'?
Agree
xv. Are there any reasons why you think this proposal will not achieve its intended objective?
This is a useful proposal and reflects good practice in some degree apprenticeships' End Point Assessment Plan requirements already. However, the Institute should ensure that the costs of bringing in suitably competent independent individuals from industry are adequately reflected in funding for assessment. This is particularly important in specialist occupations often seen in sectors such as nuclear, where there are relatively few people with the necessary knowledge and competence, so their time is scarce.
xvi. Are there any requirements that the Institute should lay out for the appointment of independent assessors with occupational expertise?

As well as significant direct professional experience, the independent assessors should be qualified at least to the level that they are assessing and should hold the relevant status with the professional institute related to the occupation (e.g., chartered status)
Implementation timeline
xvii. Do you have any concerns or foresee any problems with the timeline as set out?
Trailblazer Group employers in the nuclear sector will already be required to devote significant time to revising apprenticeship Standards as a result of the Route Reviews. These reforms will only add to the burden and the Institute needs to recognise that any changes might take some time to achieve.
Impact Assessments
xviii. Do you believe the proposed arrangements (any or all) would have a positive impact on particular groups of apprentices? (yes/no)
No
xix. If you have answered 'yes' to question 1 above, please explain your reasoning.
xx. Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of apprentices?
Yes. There would be a negative impact on apprentices who are required to take a specially-designed "occupational degree" rather than an existing degree that is valued across employers in all sectors. After completing their apprenticeship, the individual could be disadvantaged in future roles if they have not had the same opportunity to develop the full academic breadth, critical thinking and analytical mindset required for a career in the industry.