

## Institute for Apprenticeships consultation

### Mandatory Qualifications in Apprenticeships

#### Consultation

The Institute for Apprenticeships & Technical Education (IfATE) is consulting on proposed changes to the position of qualifications in apprenticeships in England. The proposals take further the policy that has been in place since Apprenticeship Standards were introduced, in that qualifications are included in apprenticeships only under certain specific criteria. The proposals do not apply to degree apprenticeships, which were subject to their own revisions last year.

#### Potential impact on the nuclear sector

The five current nuclear-specific apprenticeship Standards were written in line with the regulations in place. They generally do not include mandated qualifications, except for a Level 4 technical qualification in Nuclear Welding Inspection Technician, and an IOSH Working Safely qualification in the Nuclear Health Physics Monitor Standard. It seems likely that these qualifications could still be included even if the new proposals were implemented, so the direct impact on the nuclear-specific Standards would be limited.

However, the sector uses a wide range of Standards other than the nuclear-specific ones, some of which do include mandated qualifications that would likely be affected by the proposals (An example is the Science Industry Maintenance Technician; the fourth highest volume apprenticeship in the sector). We know from the Nuclear Apprenticeship Survey that employers use qualifications to supplement apprentices' learning, usually at additional cost, because they appreciate the value and currency that qualifications have. This means that the proposals might affect apprenticeships used in the sector.

#### Summary of the proposals:

- Harder to mandate a qualification; reducing the criteria for mandating a qualification from the current four down to three (regulatory requirements, professional body requirement, labour market disadvantage)
- Remove the current fourth option to include qualifications that provide structure for off-the-job learning, or adding breadth and depth
- Increased evidence requirements to pass the approval threshold
- It would only be possible to mandate specific qualifications (that must be listed), reducing flexibility that is currently allowed. No qualifications of a higher level than the overall apprenticeship would be approved.
- Qualifications would need to fully align with the KSBs of the Occupational Standard (and not go wider). Therefore, qualifications would likely need rewriting to get through the process.
- If approved, qualifications would need to allow one assessment to be kept for the EPA stage, and only assessed post-gateway.

- Where there is more than one qualification, a subset of KSBs must be identified to be assessed via integration and all awarding bodies must ensure this is achievable within strict guidelines including rules for assessment, marking, grading and quality assurance.

## Key concerns

Some key concerns about the proposal include:

- They would tend to reduce the overall availability of qualifications in apprenticeships. This would affect apprentices in areas where they have typically had a qualification, given the different value placed on qualifications compared to apprenticeships.
- Qualifications are often used to provide greater breadth of knowledge and understanding beyond the limits of an apprentice's current role. Given the current focus on defining Standards narrowly on only the KSBs of the particular occupation, this affects transferability (a wide concern in the sector).
- If numbers significantly drop, then awarding organisations might no longer be able to maintain qualifications and will remove them from the market, reducing choice for non-apprenticeship learners, upskilling and full-time students.
- This could also have a knock-on effect in the devolved nations, where the Framework systems still rely on qualifications in apprenticeships.
- End Point Assessment will no longer be truly independent if the proposals allow centres to carry out their own assessments - breaking a guiding principle of independent assessment, present since the Richard Review.

## Consultation response

A draft response on behalf of the NSSG is set out below. If you have any comments or additions, please contact Martin McManus by **Monday 13<sup>th</sup> February**.

[martin.mcmanus@cogentskills.com](mailto:martin.mcmanus@cogentskills.com) or 07879 405678

Employers are also welcome to submit their own individual responses. The full consultation document and response form is at:

<https://www.instituteforapprenticeships.org/reviews-and-consultations/consultations/proposed-changes-to-the-mandatory-qualifications-criteria/>

## Draft consultation response

**Q1: To what extent do you agree that qualifications should only be mandated where they fulfil a regulatory, professional body, or labour market requirement?**

Disagree.

The principle of employer-led apprenticeships should continue to mean that employer groups define the content of a Standard, including a mandated qualification where most suitable in their sector.

Qualifications are useful in apprenticeships when they provide assurance for employers that the apprentice has the required underpinning knowledge and/or skills that complement the apprenticeship Standard. They are designed differently from Standards which currently restrict the depth of knowledge that can be specified. (For example, there are limited options to expand knowledge statements, they are assessed only via one method, and the description is contained in a short statement that make it almost impossible to add any depth when designing statements that sit in Occupational Standards.)

**Q2: To what extent do you agree that qualifications which provide ‘fuller occupational coverage’ or provide structure for off-the-job training should not be mandated on this basis alone?**

Disagree.

With Occupational Standards, there is limited scope in how KSBs are written, meaning little detail on what should be taught and then assessed.

Trusted qualifications usually have a history of delivery by providers, relied upon by employers as a good way of underpinning competence in a specified role. They have detailed curriculum/body of knowledge materials and learning outcomes developed and monitored by the relevant Awarding Organisations. This means they can articulate in more detail what the content of knowledge should be; a feature often appreciated by employers.

The Nuclear Apprenticeship Survey (2021) showed that employers continue to use additional regulated qualifications such as BTECs, alongside their apprenticeship training, where they are not already embedded in the relevant Apprenticeship Standard.

Employers value the flexibility that multiple qualifications provide, and would prefer a system whereby these can be incorporated into the apprenticeship system.

**Q3: To what extent do you agree with our approach to include more specific evidence criteria when mandating a qualification due to regulatory or professional body requirements?**

Disagree.

As above, we do not believe this change to policy is a positive step to support the long-term aspirations for individuals embarking on an apprenticeship.

The current policy makes it hard to meet any threshold and the new criteria will only make the process harder. We strongly believe that qualifications have a place within apprenticeships and would rather see an open conversation about how they can be used effectively within occupational standards, rather than the policy making it harder.

<p><b>Q4: To what extent do you agree with our proposals for requiring evidence of labour market demand for a mandatory qualification? We have made some suggestions of the kinds of evidence we would expect to see submitted – in your response, we would be interested to hear of other sources of evidence which could be used to evidence the employer demand.</b></p>
<p>Disagree.</p> <p>Analysis of the labour market is difficult due to the ever-changing nature of recruitment and requirements from organisations. Evidence can be difficult to gather and when available may not be specific enough to meet threshold requirements.</p> <p>There should also be specific consideration of progression to Higher Education. Universities value qualifications, and apprentices should not be penalised at the application stage by having them removed from their apprenticeships.</p> <p>Employers would prefer to see an approach whereby their contribution to Trailblazer Groups is seen as a trusted source of intelligence about their sector and the labour market in which they operate, rather than looking for evidence that does not necessarily specify the actual views regarding qualifications.</p>
<p><b>Q5: To what extent do you agree that where a qualification has not been approved through any current or future approval process, that outcome should inform decisions about its suitability for use in an apprenticeship.</b></p>
<p>Agree – as long as the assumption remains that employers understand their own requirements and which qualifications they prefer to use to meet them.</p>
<p><b>Q6: To what extent do you agree that a qualification mandate should specify exactly which qualifications can be used to fulfil the mandate?</b></p>
<p>Neither agree/disagree.</p> <p>Agree with the principle that only explicitly approved qualifications should be allowed to be included in the assessment plan but think the application of this would be difficult to achieve and will reduce the available qualifications on the market.</p> <p>Many current qualifications in the market would not meet the full alignment requirements so they would be ruled out; reducing the pool available or forcing the development of new qualifications which may not hold the same weight in the future.</p> <p>This would also have implications for apprenticeship frameworks across the devolved nations that rely on the existing qualifications in the market.</p>
<p><b>Q7: To what extent do you agree that qualifications should align with, and not go wider than, the KSBs set out in the occupational standard?</b></p>
<p>Disagree, as long as KSB statements are restricted to minimal content.</p> <p>Qualifications provide breadth and depth for learners, allowing a wider view of the subject they are learning that supports contextualisation and application into the real world and wider roles.</p>

The restrictions on depth of describing knowledge to be taught can have an impact on transferability and limit progression opportunities, because KSBs in an Occupational Standard can only relate to the current role.

**Q8: To what extent do you agree that mandated qualifications should be at the same or lower level as the apprenticeship?**

Agree.

However, the presumption should generally be that qualifications are at the same level as the apprenticeship, unless there is a need for a small qualification early in the apprenticeship period to help progression to full competence.

**Q9: To what extent do you agree that where possible, a qualification should be integrated into the EPA?**

Neither agree nor disagree.

We believe that flexibility should remain to Trailblazer Groups to determine this aspect as it relates to their Standards.

There might be benefits in some circumstances to placing the qualification assessment into the EPA, for convenience and co-ordination. However, qualifications have their own assessment/examination requirements that are well-established and there will be times when it is preferable to follow these independently of the EPA. Qualification assessment can equally well take place before the Gateway, or during the EPA period.

**Q10: We have identified some scenarios in which integration might not be appropriate or possible. If you have further examples, please provide details to support our policy development around integration.**

N/A

**Q11: To what extent do you agree that all integrated assessments should assess the same subset of KSBs?**

Agree.

This helps to have a consistent approach, and removes the risk of awarding bodies designing smaller qualifications. The same set of KSBs must be used to ensure the right content is being delivered.

**Q12: To what extent do you agree that the defined subset of KSBs cannot be assessed by multiple smaller qualifications?**

Agree.

We are not aware of any examples of where this is necessary, and it would tend to cause more of a burden for employers and apprentices.

**Q13: To what extent do you agree that only one subset of the KSBs should be identified for assessment by integrated qualifications?**

Agree.

**Q14: We have set out our preferred approach to integration and one we know to work. We would welcome your thoughts on how this approach might work for you and any alternative modes of integration you might wish to propose.**

N/A

**Q15: To what extent do you agree that the EPA's assessment plan should indicate which of the integrated qualification's grade boundaries should attest to occupational competence?**

Agree.

This would help clarity and alignment between the qualification and the EPA Plan.

**Q16: To what extent do you agree that awarding bodies setting the qualification's integrated assessments is the best way to protect the independence and reliability of the EPA?**

Agree.

We agree that Awarding Bodies (rather than centres/providers or tutors) should set the assessments where they are integrated. However we would like IfATE to consider the costs associated with changing systems from current qualification delivery and assessment, to ensure that funding is not diverted away from apprentice learning.

**Q17: To what extent do you agree that it is fairer to apprentices if we do not allow awarding bodies to permit centre adaptation of an integrated qualification's assessments?**

Agree.

We would like to see employer input and impact assessments so that no learner is disadvantaged from achieving the assessment as per the grading structure.

**Q18: To what extent do you agree that, for integrated written and onscreen assessments, at least one assessor must be independent in accordance with the description in the proposal?**

Agree.

The assessment should remain fully independent.

**Q19: To what extent do you agree that integrated practical assessments must be conducted by a person suitably qualified to make assessment judgements, but who has no vested interest in the apprentice's or the assessment's outcomes?**

Agree.

As per Q18. The assessment should remain fully independent.

**Q20: To what extent do you agree that, where such arrangements would present significant challenges to a centre, the tutor who has delivered the content may deliver the integrated assessment, provided they are joined by at least one other assessor who is sufficiently independent.**

**Please provide examples of any potential challenges in your response, where applicable.**

Disagree.

We do not see any benefit to this approach. If there is to be an independent assessor on hand anyway, then they should deliver/oversee the assessment without anyone who has been involved in delivery of training.

**Q21: To what extent do you agree that integrated assessments must be marked or graded by the awarding organisation, independent persons appointed by the awarding organisation, centre staff with sufficient independence, or a combination of the above?**

Agree.

Any assessment conducted as part of the EPA must be conducted, marked and quality assured by an independent person; this should be managed by the awarding body only to ensure independence is maintained.

Internal staff from the provider should not be involved in this process.

**Q22: With reference to the General Impact Assessment (Section 4.1), are there any other impacts, including costs, savings or benefits, which we have not identified? Please provide examples, data and/or evidence where possible.**

*Impact on apprentices* - We believe that IfATE should pay particular attention to the potential impact on apprentices of bringing in new regulations that may leave them without qualifications through their apprenticeship. Qualifications have a value in the general labour market that is not matched by apprenticeships (which are not designated as qualifications in themselves).

*Impact on the Devolved Administrations* - We recognise that this policy applies only to England, but there is no mention of the potential impact on apprenticeships in Scotland, Wales and Northern Ireland. The proposals would appear to put downward pressure on the number of qualifications, which could affect their viability and mean that they are withdrawn by Awarding Organisations. Since apprenticeships in the devolved administrations do rely on qualifications, we would suggest that IfATE holds detailed conversations with their regulatory bodies as to the potential impact.

*Impact on progression* - We also do not believe enough emphasis on progression opportunities has been impact assessed. Removal of qualifications may reduce confidence for employers and HE providers to take on apprenticeship achievers to high-level programmes.

**Q23: With reference to the General Impact Assessment (Section 4.1), are there any additional steps that could be taken to mitigate any negative impact, resulting from the proposed approach to approvals? Please provide examples, data and/or evidence where possible.**

We propose that IfATE reconsider the whole policy and have an open discussion about the positive reasons to include qualifications in apprenticeships to support strengthening knowledge, skills and behaviours.

**Q24: With reference to the Equality Impact Assessment (Section 4.2), are there any other potential impacts (positive or negative) that have not been identified? Please provide examples, data and/or evidence where possible.**

N/A