



AELP Submission: #110

Mandatory Qualification Policy in Apprenticeships

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AELP is supportive of the Institute for Apprenticeships and Technical Education's (IfATE) timely review of its mandatory qualification policy for apprenticeships. These proposals follow the reform of degree apprenticeships which began to be implemented in the autumn of 2022.

Ensuring that more apprentices fully complete their apprenticeship remains a shared sector-wide priority. As a principle, the move to tie in the awarding of high-value mandatory qualifications (including a license to practice) into the end point assessment is a welcome proposal. Too many apprentices and employers simply use the apprenticeship and the associated funding as a wrapper to achieve a recognised qualification and withdraw before end point assessment. This behaviour negatively impacts training providers, end point assessment organisations and devalues the apprenticeship brand, dragging overall achievement rates lower than they should naturally be.

Conversely in taking forward these proposed reforms consideration of the impact on the end point assessment organisation (EPAO) market needs careful management. The shift of external quality assurance (EQA) powers to Ofqual has not been without its operational challenges and there are still question marks about true coverage across all 650+ apprenticeship standards and some of these proposed changes could cause further displacement. The move to greater integration of assessment will require more input from training providers post gateway and this needs to be properly addressed by the IfATE and the DfE – a long-standing issue, that this review again shines a light upon. Whilst the consideration for change is positive there are still concerns around the implementation and practical implications of the proposals particularly as only around 40% of standards at levels 2 to 5 have a mandatory qualification at present.

In these proposals AELP is supporting of:

- Integrating some of the on-programme assessments will ensure more apprentices remain committed to the apprenticeship and not just a high-value mandatory qualification.
- Ensuring the independence of end point assessment is a key principle which underpinned the apprenticeship reforms and needs to apply to all apprenticeships and at all levels.
- Reducing unnecessary duplicate assessment activity.
- Greater clarity on the list of qualifications that are eligible as the mandatory qualifications available for each apprenticeship standard.

In these proposals AELP has reservations concerning the following:

- The scope of the proposals on the coverage of mandatory qualifications “must not go wider” than the KSBs set out in the occupational standard lack appropriate flexibility.
- The impact on some end point assessment organisations, who may have achieved Ofqual recognition, but are not awarding organisations and this may lead to further volatility in the availability of EPA across all 650+ apprenticeship standards.
- Further clarity is required regarding how employers and/or providers who are not awarding organisations will choose who provides the mandatory qualification. How will the institute ensure there isn't a monopoly by one awarding body in future?
- The ongoing lack of consideration of the role training providers play post gateway to ensure the successful completion of the apprenticeship continues to be ignored. With the move to greater integrated assessment, this is a key area that needs to be recognised.

- Clarifying the expectations for the period of time between where gateway starts/ ends, and EPA begins. This is currently left up to a provider's interpretation within existing integrated standards due to inconsistencies in assessment plans. This needs to be a lesson learnt prior to increasing the number of integrated apprenticeship due to mandatory qualification inclusion.
- These proposals must ensure there is appropriate transparency between the cost of mandatory qualifications, end point assessment and professional membership, there is a risk of a further blurring between these three areas.

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

AELP supports this principle. It is important to ensure that mandatory qualifications carry the appropriate weighting and are recognised by employers, regulators and professional bodies as a key requirement of the specific job role for the apprentice. At the same time, some of our EPAOs members have raised concerns about professional body EPAOs and how could mandate qualifications that create monopolistic situations. The IfATE should carefully consider this when deciding to mandate qualifications which may only be offered through one awarding organisation as this would be anti-competitive.

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?

AELP agrees that using the rationale for mandated qualifications to solely provide structure for the off-the-job training is not an appropriate sole criterion for acceptance. Where this is the case the provider and employer can choose to include a qualification, but it doesn't have to be mandated and gives providers and employers more flexibility on how they design and deliver the apprenticeship curriculum and how it is effectively sequenced.

However, AELP has some reservations that the IfATE proposal that the coverage of mandatory qualifications "must not go wider" than the KSBs set out in the occupational standard lack appropriate flexibility.

The qualifications market is currently going through a significant amount of reform, especially at lower levels which is likely to reduce the number of qualification types available. There may be established and recognised qualifications already available and approved for funding and being used that cover the KSBs of the occupational standard but may offer some additional aspects too. Discarding these types of qualifications because they offer 'fuller occupational coverage' may mean that no qualification is approved to be offered in its place which would disadvantage future apprentices.

AELP believes that whilst 'fuller occupational coverage' should not be the sole basis alone for approval, we are concerned that the wording in the proposals could cast aside some high-quality existing qualifications just because their scope is over and above the requirements stipulated in the standard. Some flexibility on this should be considered by the IfATE.

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?

AELP supports the strengthening of the evidence criteria to ensure that the support from professional bodies and regulators is more specific to the actual qualifications they want to be mandated in the apprenticeship standard.

However, as mentioned earlier some of our EPAO members have raised concerns about how professional body EPAOs combined with mandated qualifications could create monopolistic situations. The IfATE should carefully consider this when deciding to mandate qualifications which may only be offered through one awarding organisation which is also a professional body or sole EPAO. This is already an issue within the construction sector where RICS have a monopoly to deliver EPA activity for standards of which they are the Professional Statutory Regulatory Body (PSRB).

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.

AELP supports the proposals to not prescribe precisely what evidence needs to be submitted as this adds flexibility to cover a range of employers operating across a range of very different occupational areas. Asking employers to provide supporting rationale is reasonable, but as ever it is important to ensure that bureaucratic requirements for employers are kept to a minimum as for smaller employers making the process too onerous will alienate them from the process reducing the suitability and feasibility of standards for employers of all sizes.

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.

It is important to not discount qualifications because they do not fit exactly with the KSBs of the occupational standard. Earlier in our response (Q2) we highlighted some concerns where approved qualifications that might offer valuable wider occupational coverage.

Conversely, for qualifications at levels 4 and 5, there will be qualifications that have not or will not be approved as a Higher Technical Qualification (HTQ) but would still be suitable for delivery to apprentices in the workplace. However, the qualification not meeting the wider HTQ scope of being able to be delivered in a classroom setting doesn't make these qualifications any less appropriate to be considered as part of an apprenticeship.

Q6: To what extent do you agree that a qualification mandate should specify exactly which qualifications can be used to fulfil the mandate?

Greater clarity on the list of qualifications that are eligible as the mandatory qualifications available for each apprenticeship standard would be a positive development to avoid confusion. Where mandated qualifications are currently required, they are listed on Standards and EPA plans to ensure that this practice is followed in future would enable consistency for providers.

However, from recent experience with the DfE's level 3 free courses for jobs catalogue, there have been issues as qualifications which are approved at an awarding organisational level as opposed to a qualification level and this has caused confusion. It is therefore important to be clear on qualification naming and delivery protocols.

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?

AELP has significant reservations concerning this specific proposal and believes that the proposed scope of the proposals on the coverage of mandatory qualifications "must not go wider" than the KSBs set out in the occupational standard lack appropriate flexibility. One of the core pillars for the future success of apprenticeships provision is for flexibility to be built into the system, enabling providers, employers and apprentices to adapt as the market requires.

When designing an occupational standard there is a limit to the scope of the criteria which can be recorded. There will be some qualifications that align closely with the occupational standard but will provide some additional related requirements, which add value to the apprentice and may be sought after by specific employers but not the sector as a whole. To simply discount qualifications that extend past the KSBs is arbitrary and disadvantages the apprentice.

It is also important for the IfATE to consider the current and future volatility in the qualifications market because of the DfE's qualification reforms, especially at lower levels and the impact this could have specifically on mandatory qualifications within level 2 apprenticeships.

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

AELP agrees with this proposal. It is important to stretch and challenge apprentices but mandating all apprentices to undertake a qualification at a higher level than the apprenticeship standard would be inappropriate and would disadvantage some apprentices where it would already be a challenge to achieve the core level requirements of the apprenticeship they want to undertake.

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

AELP is supportive of the proposals to where both possible and practical to integrate the assessment and awarding of mandatory qualifications into the end point assessment. Ensuring that more apprentices fully complete their apprenticeship remains a shared sector-wide priority. As a principle, the move to tie in the awarding of high-value mandatory qualifications (including a license to practice) into the end point assessment is a welcome proposal.

Too many apprentices and employers simply use the apprenticeship and the associated funding as a wrapper to achieve a recognised qualification and withdraw before end point assessment. This behaviour negatively impacts training providers, end point assessment organisations and devalues the apprenticeship brand, dragging overall achievement rates lower than they should naturally be.

Where apprentices are unable to complete EPA, AELP believes there should be recognition for the KSB's an apprentice has met by way of a transcript of partial completion in the same way that T Levels and universities do, enabling learners to transfer “credit” at a later point.

These proposals must also though ensure there is appropriate transparency between the cost of mandatory qualifications, end point assessment and professional membership, there is a risk of a further blurring between these three areas.

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.

Integration of assessment is unlikely to be practical for some smaller qualifications and where achievement of the mandatory qualification then allows the apprentice to access further activity in the job role which is required to complete wider aspects of the apprenticeship. For example, in construction, the Construction Skills Certification Scheme (CSCS) card unlocks access to a construction site where apprentices will then undertake activities to enable them to prove their wider occupational competency. However, it could be argued that the CSCS card should be an entry requirement funded by an employer, to enable the apprenticeship provider to focus on developing occupational competence straight away.

For some occupational standards within logistics and transport, apprentices are required to hold a valid UK driving licence Category D (this will allow the apprentice to drive a vehicle with more than eight passengers) - limiting completion of this mandatory qualification until the end point assessment would limit the apprentice's ability to develop wider KSBs required as part of the required on-programme apprenticeship training.

Likewise, several Ambulance related standards require apprentices to have a valid UK driving licence for the class of the vehicle being driven following DVLA requirements, this is normally Class C or D depending on the type of role being undertaken. This is required for entry to the programme with Level 2 Ambulance driving and Level 3 Emergency Response driving being required early on in their programme. Limiting completion of these mandatory qualifications until the end point assessment would limit the apprentice's ability to develop wider KSBs required as part of the required on-programme apprenticeship training.

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

AELP supports this proposal. There is currently still too much inconsistency within end point assessment because of a legacy of indifferent approaches to external quality assurance. Aligning integrated assessment requirements is a positive step to ensure consistency and comparability of assessment outcomes.

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

To ensure unnecessary complexities for integration the proposal that multiple, smaller qualifications cannot be integrated to assess the identified subset of KSBs is reasonable. It is important to still

allow for qualifications that are not integrated to be mandated as trailblazers require, such as the Driving License - Class C or D requirements referred to above.

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

AELP agrees with this principle as it should ensure unnecessary complexities for providers, apprentices and EPAOs alike and allows for compatibility and fairness of assessment outcomes. As mentioned above there is currently too much inconsistency within EPA.

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.

Not applicable.

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?

AELP supports the IfATE proposals on grading. Introducing a grading approach for mandatory qualifications so they align to EPA would be complex and add little value.

Ensuring that grade boundaries for an EPA pass align with the successful completion of the mandatory qualification would be a reasonable approach to move to in the new integrated model. Additionally, learning could be taken from the methods used within a fully integrated EPA where a pass or fail element is used following assessment boards and how this could be combined into an EPA alongside other assessment methods.

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?

AELP supports this proposal. Awarding organisations are assessment experts and are best placed for setting the qualification's integrated assessments to protect the independence and reliability of the EPA. As a qualifications regulator and the leading external quality assurance provider, Ofqual also needs to ensure they have appropriate oversight of this activity and standard setting too. However, consideration will need to be given to how EPAOs who are not Awarding organisations will be able to administer the integrated assessments.

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?

AELP agrees - To ensure consistency in the approach to integrated assessments is important to ensure appropriate comparability. The continuation of EPAOs allowing for reasonable adjustments is important to enable apprentices with additional needs to be not disadvantaged.

Furthermore, the IfATE should also consider what emergency measures they could allow on adaptations if there was an unprecedented event, such as the recent pandemic where adaptations were allowed to ensure that apprentices were still able to complete their qualifications including

end point assessments if the ideal conditions are unavailable. Considering how the continuity of EPA delivery will be maintained would be sensible based on learnings from the last couple of years.

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?

This is a reasonable principle to ensure the integrity of the assessment, however, the IfATE's proposals lack reference to the use of technology to ensure the integrity of the assessment. For example, with onscreen assessments, the appropriate use of remote proctoring technology to ensure the assessment is undertaken within exam conditions. This is something the IfATE should consider in their final decision, especially with the ever-developing use of technology around electronic assessment and invigilation. Including technology would also support providers in providing flexibility and continuity of EPA for learners as referred to in Q17.

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?

Assessments should be carried out by someone who is qualified to make assessment judgements to ensure consistent and fair outcomes for apprentices. Where assessments are integrated to ensure practical delivery, due consideration is required to allow centre staff with sufficient independence from the training provision the ability to be involved in conducting assessments and making assessment judgements. This is allowed already within integrated EPAs at levels 6 and 7 so should be feasible at lower levels subject to the appropriate conflict of interest checks.

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.

This may be an issue for smaller training providers, or where providers have a small amount of niche provision and therefore do not have the volume of staff with the occupational expertise and have been independent of all aspects of the apprentices' training provision. Some providers in some settings, such as group training agencies (GTAs) may be able to work together to share a resource to support assessment activity, but such a model will not work or be practical for all providers, especially the niche providers or where provision is dispersed, and transport is an issue. It is therefore important to ensure different options for the assessment of integrated qualifications – for example, this could be delivered where possible by the provider or by the awarding/end point assessment organisation. However, currently, the Conditions of the Register of EPAOs (section 6) precludes providers from working together in this way, as a result, the rules around reciprocal arrangements would need to be relaxed to enable flexibility, particularly for smaller or niche training providers to share expertise whilst retaining independence.

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?

Ensuring the independence of end point assessment is a key principle which underpinned the apprenticeship reforms and needs to apply to all apprenticeships and at all levels. To ensure the continuing credibility of end point assessment activity there needs to be a degree of independence. However, where assessments are integrated to ensure practical delivery due consideration is required to allow centre staff with sufficient independence from the training provision the ability to be involved in the assessments. Learning should be taken from the provision which is already integrated at levels 6 and 7 where this approach is being successfully conducted.

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