

IfATE Consultation responses

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

Response: Fully agree that these criteria make sense and are beneficial to the apprentices. However, there are concerns as to how these are applied, which is covered in later questions.

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?

Response: Fully agree. If the learning is required for the job role, then it should be included in apprenticeship. However, the apprenticeship should not require word for word coverage, but alignment between the qualification and KSBs should be demonstrated.

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?

Response: Fully agree

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 employer demand.

Response: Agree that the 10 job adverts and letters of support are insufficient. However, it would be better if there were firm criteria that you were looking for, rather than keeping it open, for example

- How many consultation responses would you be looking for?
- How many job adverts are sufficient?
- What other labour market information would you be looking for?
- What level and type of completion and progression data would you be looking for?

Without clearer guidance, trailblazer groups will potentially all be approaching this differently and being assessed differently by the different route panels. The approach suggested is very subjective and goes against the move towards transparency and openness, which IfATE have been proposing and implementing in areas such as funding decisions.

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

Response: The vast majority of professional qualifications are not HTQs. Limiting the qualifications that are in apprenticeships to those that have been through the current or future approval process will exclude useful qualifications that are required by employers and useful/required by them for future employment, which goes against the principles included in the consultation for including mandated qualifications in the first place and could potentially have a knock on effect to apprenticeship starts. It should also be noted that many professional organisations have external accreditations in place so are recognised and quality assured via different routes.

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

Response: Fully agree.

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?

Response: If knowledge, skills or behaviours are needed for the role then they should be covered in the apprenticeship. However professional qualifications are designed to fulfil criteria beyond the apprenticeship, so may cover more than is required by the knowledge, skills and behaviours. As a

minimum the mandated qualification should cover the agreed requirements. Professional qualifications are designed to meet the needs of employers and involve employer input in their development. To mandate only coverage of the KSBs could prevent qualifications that are advantageous to apprentices being excluded from the apprenticeship and will therefore put them at a disadvantage in the labour market

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

Response: Agree. The default position should be that the qualification is the same level as the apprenticeship, however we appreciate that there may be times where this needs to be lower, for example health and safety qualifications

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

Response: Given the challenges outlined in the consultation, this makes sense, however if apprentices can partially achieve qualifications on programme, then this will remove some of the assessment burden of the EPA.

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.

Response: No other examples

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

Response: Disagree. If the intention is to allow mandated qualifications to only assess the requirement for the apprenticeship and the intention is for these mandated qualifications to only assess the same subset of KSBs, it will force professional bodies and other organisations to develop qualifications purely for the apprenticeship. This has the potential to undermine any benefit of including mandated qualifications as the qualifications would have to be changed to meet apprenticeship requirements. Where more than one qualification is permitted in the standard, then multiple assessment routes should be available for EPA – ultimately all apprentices will be assessed on the same KSBs.

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

Response: Disagree. As long as the KSBs are assessed, this should not make a difference

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

Response: Disagree. If the intention is to allow mandated qualifications to only assess the requirement for the apprenticeship and the intention is for these mandated qualifications to only assess the same subset of KSBs, it will force professional bodies and other organisations to develop qualifications purely for the apprenticeship. This has the potential to undermine any benefit of including mandated qualifications as the qualifications would have to be changed to meet apprenticeship requirements. Where more than one qualification is permitted in the standard, then multiple assessment routes should be available for EPA – ultimately all apprentices will be assessed on the same KSBs.

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.

Response: If qualifications are mandated and moving into the end point assessment, then the qualifications need to work for employers, awarding bodies and apprenticeship providers. Forcing

professional bodies to develop new qualifications to meet the limitations of integration does not achieve the integration of established qualifications into apprenticeships – it just means professional bodies and other organisations need to develop apprenticeship specific qualifications or approaches, which might not be comparable to existing approaches. One approach is not going to be suitable for all, so IfATE should consider principles for integration that could be applied across the board. For example:

- The assessment needs to form part of the EPA.
- The assessment needs to be assessed in a way that is compatible with the apprenticeship.
- Where multiple mandated qualifications exist in one standard there are different paths to completing EPA.
- It is clear to apprentices, employers and training providers which part of the EPA is being assessed by the mandated qualification and the rest of the assessment plan is developed around this to avoid duplication of assessment.

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?

Response: Disagree. I believe it will be confusing for the market and for the apprentices if they have passed a qualification, but it does not count towards their apprenticeship unless they achieve merit or distinction, for example. If a qualification is mandated in an apprenticeship, a pass should be sufficient

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?

Response: Agree.

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?

Response: Disagree. If a qualification is offered in the public domain where centres can adapt the assessments, then by not allowing this for apprenticeships, apprentices are potentially being disadvantaged.

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?

Response: In an ideal world the assessment would be completely 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?

Response: Agree.

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.

Response: Disagree. Where this is the case, the second assessor must have an understanding of assessment and be competent in assessing – they do not necessarily need to know the subject matter. Only requiring them to be independent is not sufficient.

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?

Response: It depends on the qualification being assessed, but the preferred option would be that the assessment is marked or graded by the awarding organisation or independent persons appointed by

the awarding organisation. If centre staff are assessing then external validation by the awarding organisation would be needed.

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.

Response: No response.

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.

Response: as stated in previous answers, by forcing professional bodies to change the design and content of their qualifications to fit the requirements of the apprenticeships, you are not achieving the integration desired, but asking professional bodies to design qualifications purely for the apprenticeship model. This has the potential impact of undermining the apprenticeships as the apprentices will not have achieved the qualifications asked for by employers, that already has traction in the market, but a qualification that has been designed to fit into limited criteria.

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.

Response: No response.