



Department
for Education



Department
for Business
Innovation & Skills

The Future of Apprenticeships in England: Next steps from the Richard Review - Response form

A copy of the consultation on **The Future of Apprenticeships in England: Next steps from the Richard Review** can be found at:

<https://www.gov.uk/government/consultations/future-of-apprenticeships-in-england-richard-review-next-steps>

You can complete your response via the [online survey](#)

Alternatively, you can email or post this completed response form to:

Postal Address:

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The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is: **22 May 2013**

Confidentiality & Data Protection

Please read this question carefully before you start responding to this consultation. The information you provide in response to this consultation, including personal information, may be subject to publication or release to other parties. If you do not want your response published or released then make sure you tick the appropriate box?

- Yes, I would like you to publish or release my response
- No, I don't want you to publish or release my response

Your details

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Please tick the boxes below that best describe you as a respondent to this consultation

- Business representative organisation
- Independent Training Provider
- College
- Awarding Organisation
- School
- Charity or social enterprise
- Individual
- Legal representative
- Local government
- Large business (over 250 staff)
- Medium business (50 to 250 staff)
- Small business (10 to 49 staff)
- Micro business (up to 9 staff)

- Professional body
- Trade union or staff association
- Other (please describe) Central admissions service for HE sector

Introduction

UCAS welcomes the opportunity to respond to this consultation on the Future of Apprenticeships in England. Our response is prefaced with some general observations and comments. We have only responded to those questions which are pertinent to UCAS.

UCAS is the UK's provider of admissions services for higher education (HE). Our mission is to help applicants to HE make the right choices for the right reasons with the right outcomes, and to benefit our members through the provision of shared services.

UCAS provides information and advice, course information, entry requirements, and admissions services to around 650,000 applicants to over 350 UK higher HE providers each year. These applicants make over 2 million applications to higher education courses. UCAS services support applications for full-time HNCs, HNDs and foundation degrees as well as undergraduate and some postgraduate degrees.

UCAS Progress¹ offers course search and application services focused on the transition to post-16 education and training. Its online course directory and application services cover a range of opportunities and destinations – including academic and vocational qualifications, the learning elements of Apprenticeships, and work-based training. This service enables young people and their parents or advisers to access information about a wide range of options and course choices available locally so that they are able to make informed choices. UCAS Progress currently operates across 77 local authorities in England and Wales. Services are used by around 2,180 schools and colleges and available to over 245,000 learners, including 328 colleges offering Apprenticeship frameworks.

General comments

Although the focus of the consultation is the reform of Apprenticeships and the government's commitment to put employers at the heart of the Apprenticeship system, it is important to recognise and acknowledge the future progression pathways that Apprentices may take.

The consultation proposals envisage more Apprenticeships at level 3 and at level 4 and above and this is to be welcomed. However, further work is required to articulate recognisable progression routes and pathways from levels 2, 3 and 4 and from an Apprenticeship into further education or HE. Such progression pathways will need to be flexible and dynamic if they are to remain relevant and to meet developing employer needs as well as providing opportunities for individual progression.

It is suggested that there will be a need to map Apprenticeships to HE courses and professional qualifications. UCAS already supports Apprentices who are interested in applying to HE through provision of specific advice, and through improvements to our application service which makes it easier for Apprentices to provide information about their

¹ <https://www.ucasprogress.com/>

qualifications. Planned developments will also make it easier for universities and colleges to access information about Apprenticeship frameworks. We would be interested in exploring how UCAS could contribute to any progression mapping activity.

Additionally, if there was demand for a service to allow young people to search for information about Apprenticeships and apply for these alongside HE courses, UCAS would be well placed to develop and support this.

1. The Government agrees that Apprenticeships should be designed for and targeted at those at the outset of a new job role or occupation, to train them in the skills needed for that job and to provide a springboard for their future careers. This includes helping people to advance within their existing employment, where the Apprenticeship is firmly focused on training for a job at a higher skilled level. Most important is that substantial learning takes place, with the application and practice of new knowledge and skills in a real workplace. For those already experienced and competent in their roles, Apprenticeships will not be the right approach – unless they are advancing to a substantially higher skilled role.

Question 1: How can we ensure that every Apprenticeship delivers substantial new skills?

It could be a condition of funding and approval that all Apprenticeships should be training for a new job role or occupation. This could be built into the design and delivery of all Apprenticeships, with particular emphasis on outcomes which represent real and measurable achievement and the development of new skills for each Apprentice. This would need to be coupled with appropriate assessment and oversight as articulated in the consultation.

2. The Richard Review recommends that every Apprenticeship should be based on employer-designed industry standards. It recommends that these new standards should focus on outcomes and mastery of the occupation or major job role, and should replace Apprenticeship frameworks, the current qualifications which comprise them and the national occupational standards which underpin them. The new standards would set out simply and clearly what employee in that occupation or major job role will need to be able to do.

The Government agrees, and believes that employers should take responsibility for designing these new standards. We are seeking views on the best way to bring employers together to do this – for example through a competition, or a facilitated or collaborative approach.

Question 2: How should we invite and enable employers to come together to design new standards for Apprenticeships?

This might be achieved through Sector Skills Councils, sector professional bodies and regional partnerships.

3. The Richard Review recommends that the government should set criteria that the new Apprenticeship standards should meet, as below. This is that they should:

- be stretching;
- deliver transferable skills;
- have significant buy in across the sector, including from SMEs, and be deliverable by small employers;

- require substantial training and take more than a matter of months to become competent at – involving training significantly beyond that offered to all new staff;
- include skills which are relevant and valuable beyond just the current job, supporting progression within the sector; and
- reflect a real job, not generic skill

Question 3: What are your views on the proposed criteria for Apprenticeship standards as set out in section 2 of the document?

UCAS does not wish to respond to this question.

4. The Richard Review recommends that there should be just one Apprenticeship standard and qualification for each occupation or major job role. He proposes that these should set out what an Apprentice should be able to do and know at the end of their Apprenticeship, in a way that is relevant and meaningful for employers.

The government recognises the strong arguments set out in the Review that there should be only one standard. We also recognise that for some sectors the nature of individual jobs may vary significantly between employers, even for job roles that are nominally the same. We need to find a solution to take account of this – for example through a “core and options” approach for each standard and qualification, increasing their flexibility to different settings and contexts whilst ensuring a rigorous core of essential knowledge and skills.

Question 4: Should there be only one standard per Apprentice occupation/job role?

Yes

No

Don't know

Please explain your response:

This should be a matter for employers.

5. The Richard Review recommends that there should be just one Apprenticeship standard and qualification for each occupation or job role. And that these should set out what an Apprentice should be able to do and know at the end of their Apprenticeship, in a way that is relevant and meaningful for employers.

The government recognises the arguments set out in the Review that having just one qualification per standard could maximise recognition, consistency and transferability, and make it easier to assure that quality is maintained. However ending the market in qualifications would be a significant step, and there are other options – for example agreeing a single standard but retaining a market in qualifications to test against it.

Question 5: Should there be only one qualification per standard?

Yes

No

Don't know

Please explain your response:

Although this is primarily a matter for employers, it is important that learners and education providers have clarity about the nature Apprenticeship qualifications and how they could support future progression opportunities. It is also important that there is clarity for HE providers about what standard of knowledge and skills an Apprenticeship represents. For

example, the work underway within some Sector Skills Councils (SSCs) to include additional units and qualifications within frameworks covering the development of self-directed study and extended writing skills is valuable for Apprenticeship frameworks geared towards supporting future progression to HE. However, whether this is certificated through one or multiple qualifications is unlikely to be an issue for HE providers.

Where a single qualification covers a range of different options and routes of varying content, size and assessment methods, it can be difficult for HE institutions to make valid judgements regarding its value and suitability for HE progression purposes. Greater clarity regarding mandatory, optional and additional elements within qualifications and Apprenticeships would be welcome - whilst recognising that from an employer perspective having flexibility is likely to be key in ensuring fit for purpose.

6. Our proposals to replacing the current Apprenticeship Frameworks with new employer-designed standards and qualifications would be a significant reform, and will need careful planning and collaboration.

We would like views on how best to manage the transition from the current system of multiple frameworks and qualifications to the more streamlined system of standards and qualifications which are recognised and valued by learners, employers and educational institutions.

For example - in the short term there may be merit in reviewing existing frameworks and / or the qualifications contained within these to remove those that employers do not value or which are furthest away from the new expectations for Apprenticeships

Question 6: How should we manage the transition from the current system of Apprenticeship frameworks to a new system of employer-designed Apprenticeship standards and qualifications?

Schools, colleges, and HE providers would benefit from a single implementation date. However, recognising that the scale of the task in reforming Apprenticeships means that this is unlikely to be realistic, we would support a planned and phased implementation programme that is as simple as possible and clear for all to understand.

There could be a case for considering whether some distinction could be made in terminology between the old and new versions of Apprenticeships, particularly in view of the intended major reputational advantage of the employer-designed Apprenticeship standards and qualifications.

7. Once the new Apprenticeship standards are agreed it will be important that they remain rigorous, stretching and relevant to employers.

Question 7: How can we make sure that the new standards stay relevant to employers, and are not compromised over time?

UCAS does not wish to respond to this question.

8. Whilst some employers already contribute to the design and development of assessment, we agree with the Review on the benefits of employers playing an increased role in this area. This relates both to the design of the final test for the occupation or major job role and to the ongoing arrangements for assessing the competence of Apprentices

who take this, working with awarding organisations. Increased employer involvement will help to build trust in the credibility and rigour of the assessment process. In pursuing this, we will need to ensure that we do not ask more from employers than they have the capacity to do, which will vary between sectors and occupations.

Question 8: How can we ensure that employers are better engaged with the development and oversight of the assessment in Apprenticeships?

[UCAS does not wish to respond to this question.](#)

9. The Review proposes that employers also have a more direct role in being part of the final assessment of individual Apprenticeships. We are keen to explore how this might be achieved in practice, without placing undue burden on employers and recognising the expertise required of professional assessors. The role of such professionals will continue to be important.

We propose therefore to include assessment as a further area to be considered by those developing Apprenticeship standards. Employers would be invited to set out what an effective test of competency against the standards they wish to set would be, and how the arrangements for its delivery might work.

Question 9: How could employers best be involved in the practical delivery of assessment?

[UCAS does not wish to respond to this question.](#)

10. The key principles of assessment in any education or training system are independence, consistency and the maintenance of standards over time. Independent assessment should be demonstrably objective, separated from any individual or organisation with an incentive for whether the individual passes or fails. This might be achieved, for example, by ensuring that assessment is fully independent of training delivery. Or, where this is not possible, through robust arrangements for independent verification to ensure objectivity is maintained. By consistency we mean that the outcome of the assessment should not vary between different settings, workplaces or areas.

Question 10: How can the independence and consistency of assessment in Apprenticeships be further improved?

[It is important for the credibility of Apprenticeships for onward progression to education, as well as for employment, that the independence and consistency of assessment can be relied upon and that the qualifications have a currency that is recognised and understood.](#)

11. Apprenticeships today, as a result of the qualifications they contain, often focus heavily on continuous assessment. This can be at the expense of new teaching and learning. Indeed, some Apprentices tell us that their Apprenticeship experience has been dominated by assessment alone. Re-focusing on assessment at the end will allow trainers to spend more time teaching, not testing.

Question 11: How should we implement end point assessment for Apprenticeships?

[UCAS does not wish to respond to this question.](#)

Question 12: How should we implement grading for Apprenticeship qualifications?

As the consultation notes, it has been customary for occupational/ competence-based qualifications to be graded as pass/fail. A lack of grading can create difficulties for HE providers in assessing suitability of such qualifications for progression to HE, particularly for competitive courses, because this approach does not provide an opportunity to recognise high levels of achievement.

Grading must be fit for purpose, and hence we would expect grading to recognise the achievement of skills and knowledge valued by employers. Whilst this will be of interest to admissions staff, grading alone will not suffice for progression purposes, as HE institutions will still need evidence that individuals have the learning, study, and writing skills to succeed in an HE environment. Provision of opportunities within Apprenticeships to take graded qualifications that attest to these skills is likely to provide a more solid basis to support progression.

13. From August 2014, we will require all Apprentices who begin their Apprenticeship with only level 1 qualifications in English and/or maths to work towards level 2 attainment in these subjects during their Apprenticeship. At this interim stage Apprentices will not need to have achieved level 2 English and maths in order to successfully complete their Apprenticeship.

In future years our ambition is to go further, so that all Apprentices (including those starting without a level 1 in English or maths) must achieve level 2 English and maths as part of their Apprenticeship.

Question 13: What are the specific obstacles to all Apprentices achieving level 2 English and maths as part of their Apprenticeship, and how could these be overcome?

UCAS does not wish to respond to this question.

Question 14: How would a requirement to have all Apprentices achieve level 2 in English and maths impact on employers, providers and potential learners? What are the risks and potential solutions?

Achievement of level 2 in English and Mathematics is likely to be a pre-requisite for most kinds of HE study, although it may not be appropriate to require Apprentices to take re-take GCSE English and Mathematics – alternative level 2 qualifications may be needed.

Issues could arise where an individual Apprentice fails to achieve, say, level 2 mathematics, but is in every other way fully competent to achieve an Apprenticeship and work within their sector. The question therefore arises as to whether this should be a rigid requirement, as opposed to there being strong encouragement to achieve level 2. In every case the literacy/numeracy should be made as relevant as possible to the job role.

15. Our proposed reforms, focusing on final competency and removing the detailed prescription and incremental assessment that many Apprenticeships involve today, will give greater scope to train in more flexible ways. We want more empowered employers, working with training providers and learners, to shape each individual Apprenticeship. Our reforms will incentivise greater responsiveness, innovation and dynamism in training

delivery, with more new entrants to the market bringing fresh ideas and approaches. We want to encourage this, and also spread good practices and take full advantage of the opportunities offered by new technologies.

Question 15: What further steps, by government or others, could encourage greater diversity and innovation in training delivery to help Apprentices reach the standards that employers have set?

UCAS does not wish to respond to this question.

16. We recognise the benefits for Apprentices of having sufficient time to learn and reflect well away from their “day job”, and share Doug Richard’s concerns that many Apprentices today lack sufficient time away from their workplace and off-site. This brings the opportunity for additional training, and gives the time and space to gain fresh perspectives and consolidate learning. Further benefits can come from shared learning with other Apprentices. We want to ensure this is a core component of every Apprenticeship, without undermining employers’ ability to shape each Apprenticeship as they see fit.

Question 16: What approach would work best to ensure Apprentices benefit from time to train and reflect away from their day to day workplace?

UCAS considers that reflection should be an important part of Apprenticeships, and that this needs to take place away from the place of employment, for example in a college or home environment. Apprentices could be required to develop portfolios of achievement including a reflective element and this could feed into the assessment process.

Question 17: Should off-site learning be made mandatory?

Yes

No

Don’t know

Please explain your response:

It is important that Apprentices should have the opportunity for formal learning and reflection, and this should take place away from the pressures and demands of the workplace e.g. in college, on the premises of a training provider, or at home.

18. Employers need to be able to trust in basic safeguards for the legitimacy, quality and capacity of training providers they may wish to deal with. The Skills Funding Agency checks the financial credentials, capacity and any Ofsted inspection record of training providers receiving public funding. We will build on these arrangements to ensure that, as far as possible, they are an effective assurance of training quality as well as financial health, and that this information is accessible to employers to support their choice of provider. In doing so, we must ensure a process that facilitates new providers entering the market. We are also developing a “chartered status” concept, to give employers a visible symbol for high quality and responsive training organisations.

Question 18: How can the process for approving training providers be improved, to help employers find high quality, relevant training?

The processes operated by the Skills Funding Agency and Ofsted may need strengthening to cover the quality of training.

19. We agree that voluntary, employer led kitemarking could play a role in helping employers find the right occupation-specific training. We believe it is for industry and professional bodies in each sector to judge this, and to develop and implement any schemes they believe appropriate. The aim would be to guide employers towards those providers with a strong record and offering good service in their particular area. A number of models are possible, and it may often be that the best approach will differ between sectors. However, if there is strong support for kitemarking in a number of sectors, there may be a case for an overarching framework and branding to reduce the scope for confusion and burdens on providers.

Question 19: Do you believe that a kitemarking scheme for your sector or profession would add value and be supported?

Yes

No

Don't know

Please explain your response:

UCAS does not wish to respond to this question.

20. The government has a particular responsibility to make the data it collects easily available for others to make good use of. This is an area in which we recognise we can do better, and we agree the emphasis that Doug Richard has placed on this.

The government's Digital Strategy signals our intent to do more to harness the creativity and innovation of the private sector, to enable the development of tools and services that maximise the value of data collected by Government.

Question 20: What more can government do to facilitate effective third party/external use of its data to better inform individuals and employers about Apprenticeships?

We would support continuation of the approach taken by the National Apprenticeship Service to provide data feeds to other organisations, such as UCAS, to enable Apprenticeship opportunities to be displayed and communicated via existing channels and information and outreach activities.

Question 21: What approaches are effective to inform young people and their parents about the opportunities provided by an Apprenticeship?

We welcome the recognition in the consultation that there is a need to improve the way that information about Apprenticeships is communicated to young people, parents, teachers, and advisers. Many learners will be unfamiliar with what Apprenticeships entail and what benefits they confer. As the Holt Review has concluded, schools are unlikely to

be sufficiently familiar with Apprenticeships to provide impartial and informed advice and guidance on the range of Apprenticeships available and the opportunities that these provide.

As UCAS has a high profile in schools and is a trusted and recognised source of information about education opportunities we can support efforts to promote Apprenticeships alongside progression to HE. Our UCAS Progress service already provides information about the learning components of Apprenticeships and we are discussions with the National Apprenticeship Service about displaying a wider range of opportunities available. We would welcome an opportunity to discuss further how we could inform and support potential Apprentices.

As proposed in the Holt Review engagement of employers with schools and training providers could make a significant contribution to understanding and awareness raising.

22. There is some excellent practice in forging meaningful connections between industry and education, but we accept that this is by no means universal and varies by both place and sector. We are committed to improving employer links with schools, colleges and other training providers. Current activity includes work by the National Careers Service, National Apprenticeships Service and local employer partnerships, as well initiatives led by third sector organisations.

Question 22: How can we support employers to engage with learners of all ages to provide information about Apprenticeship opportunities?

Employers may find it easier to engage with learners if they can access generic resources about Apprenticeship opportunities, as well as sector specific materials. Local and regional collaboration should also be encouraged.

23. It is important that we assess the impacts, both direct and indirect, of the reforms set out in the government's response to the Richard Review of Apprenticeships. Initial screening suggests that of the groups with protected characteristics some of the changes proposed could directly or indirectly impact in terms of gender, ethnicity, age and disability. We would welcome views on this issue from all respondents and particularly organisations representing these groups and others that may be affected.

Question 23: Do you consider that the proposals set out in this document would have a positive or negative impact on any group, including those with protected characteristics? Please provide any comments or evidence you have for your answer and set out which aspects of the reforms will impact and how these impacts might be managed.

UCAS does not wish to respond to this question.

Question 24: Do you have any further comments on the issues in this consultation?

UCAS does not wish to respond to this question.

Thank you for taking the time to let us have your views on this consultation. We do not acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply