**Edge response to IfATE’s Degree Apprenticeship Consultation**

[Link to the consultation document](https://www.instituteforapprenticeships.org/media/5244/degree-apprenticeships-consultation-acc.pdf)

**Change 1 - 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.**

**i. Do you agree or disagree with the proposal set out in ‘Change 1’?**

**[agree/**neutral/disagree]

It is becoming increasingly difficult to incorporate degrees into apprenticeships due to IfATE applying rigid criteria for including qualifications. Instead, organisations such as UUK (2019) have argued that the power to specify a degree apprenticeship should rest with Trailblazer groups, where there is evidence that it will increase productivity and/or enhance social mobility.[[1]](#footnote-1) This is something that we would also support.

Employers and apprentices have also been clear that the degree is a crucial part of the standard and without it they would not attract the talent they need, thus affecting the very purpose of the apprenticeship. This is backed by research from Engeli & Turner (2019)[[2]](#footnote-2) who strongly suggest that level 6 or 7 apprenticeships without a degree will be less attractive to learners. In addition, the evaluation of the DADF (WECD 2019)[[3]](#footnote-3), highlighted concerns that Higher Apprenticeships that do not include a qualification will have limited appeal, currency or transferability.

While there is evidence that a degree is of value to employers and apprentices, we would caution against automatically putting a degree onto every qualification. Where there is evidence that a degree is of value, Trailblazers should be allowed to mandate a degree. However, not every qualification may need a degree, for example, accountancy and taxation Higher Apprenticeships.

Instead, greater distinction is needed between the terms ‘Degree Apprenticeships’ and ‘Degree Level apprenticeships’. For clarity, ‘Degree Apprenticeships’ should have a degree awarded as part of its qualification, while ‘Degree Level Apprenticeships’ do not have a degree award attached to them. However, this is not to devalue the alternative qualifications Degree Level Apprenticeships may offer, and they should still enable learners to progress to a level of education similar to that of degree level at level 6.

While Trailblazers are an important stakeholder, they are not the only stakeholder. We would argue that greater collaboration is needed across employers, apprenticeships and training providers, and there is much we can learn from the Graduate Apprenticeship programme in Scotland. For example, Scotland’s new industry-led development model brings together employers, apprentices, trade unions and industry representatives to understand both current and future work needs. This cross-collaboration ensures that Graduate Apprenticeships are aligned to the realities of work and supported by strong standards. As a result, graduate apprentices develop relevant work-based skills and employers are supplied with a skilled and productive workforce

**Change 2 - IfATE providing better guidance on integrating the on- and off-the-job elements of the course**

v. **Do you agree or disagree with the proposal set out in ‘Change 2’?** [agree/neutral/disagree] **Agree**

vi. **Are there any reasons why you think this proposal will not achieve its intended objective?** (free text)

vii. **Are there any additional ways in which you think the objective to integrate on- and offthe-job training can be achieved?** (free text)

We agree with this proposal. High quality, integrated on-and off-the-job elements should be a crucial element of Degree Apprenticeships.

However, the level of current off-the-job training in English apprenticeships is low against international benchmarks and the standards are narrow, with a lack of transferable skills (Our Plan, 2019)[[4]](#footnote-4). For example, the OECD highlight that apprenticeships in dual systems involve a substantial amount of general, off the job education, representing 400 hours, compared with approximately 50 hours of study in English apprenticeships (OECD, 2018) [[5]](#footnote-5).

“Off the job” training in England generally refers to time spent at educational settings or with training providers. But “off the job” should not just be narrowly confined to academic settings - we should integrate broader “off the job” opportunities to broaden transferable skills. For example in Germany, employers provide training to apprentices in workshops and centres away from the shop floor, in addition to the day a week that apprentices spend in vocational schools. In Austria, one third of their off-the-job training time is devoted to general education, including subject-related language training.[[6]](#footnote-6)

The quality criteria for off-the-job training currently proposed by IfATE is mostly quantitative, and does not address the quality of training. Instead, Fuller and Unwin set out a set of desirable qualitative characteristics of ‘expansive’ apprenticeships, whereby off-the-job-training should include time for reflection, and development. See Annex 1 for more detail.

We strongly support these recommendations from Fuller and Unwin, and called for this clearly in “[Our Plan for Apprenticeships](file:///C%3A%5CUsers%5Cewilson%5CDesktop%5Cedge20e2809320apprenticeships20report2028final20-20web29_41nXjVp.pdf)”. Employers, providers and students should work more closely together to ensure that the feedback loop of learn – practice – reflect sits at the heart of learning so that apprentices can reinforce, stretch and evaluate progress continuously. Roles and responsibilities should also be set out clearly between the employer, apprentice and training provider with a clear and jointly agreed development plan that is discussed regularly by the apprentices, training provider and employer together in a discussion moderated by mentors [who are based with the training provider].

The role of a mentor should also be more significant. In Jersey, apprentices are given a dedicated, qualified mentor to coach, support and guide them through their apprenticeship. Mentors meet regularly with apprentices on a one to one basis to help develop their soft skills; help arrange employer, apprentice and tutor meetings and challenge and develop apprentices to reach their full potential. To help the apprentice get the best from their apprenticeship, mentors use coaching techniques such as personal reflection, performance review, goal setting and action planning. They meet with apprentice and employer on a quarterly basis to facilitate progress reviews and joint goal setting, and bring this together neatly into a Personal Development Plan.[[7]](#footnote-7)

**Change 3 - Ensuring that learner outcomes reflect the knowledge, skills and behaviours in industry.**

viii. **Do you agree or disagree with the proposal set out in ‘Change 3’?** **[agree**/neutral/disagree]

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?** (free text)

We agree that the DA programme should build the knowledge, skills and behaviours required in that profession. As part of this, employers need to play a key role in setting standards and specifying the knowledge, skills and behaviours that individuals will need. Knowledge, skills and behaviours should be specific – with clear objectives tailored to each programme so that apprentices are able to clearly map their progress against objectives. This should be updated regularly for each new cohort, to ensure that DAs remain current and aligned to the needs of industry.

As linked to our response to Change 2, apprentices should also be supported closely by a mentor to reflect and monitor progress and development against the KSBs.

As part of this, we also need to see employers and training providers working closely together to develop effective, rich partnerships. Together they should ensure high quality in the: overall programme design; integration of learning goals with business or service needs; and monitoring and supporting apprentices [Lester and Bravenboer, 2020]

**Change 4 - The synoptic EPA will continue to be a requirement of all Degree Apprenticeships**

xi. **Do you agree or disagree with the proposal set out in ‘Change 4’?** [agree/**neutral/**disagree]

xii. **Are there any reasons why you think this proposal will not achieve its intended objective?** (free text)

There is certainly a clear case for some end point assessment in apprenticeships to ensure that apprentices can bring together everything they have learned and prove themselves as a fully-fledged professional in their field. However, it is unacceptable for the significant proportion of apprentices who do not complete to leave with nothing (Our plan, 2019).

Separate or poorly designed end-point assessments have been described as inadequate for overall assessment of higher-level apprenticeships (Saraswat 2016) and a concern for learners (Hughes & Saieva 2019). Structurally, there is concern that Degree Apprenticeships need stepping-off points where learners can leave with a level 4 or 5 qualification, with the opportunity of re-joining the apprenticeship later or using it to move to an adjacent field (Bishop & Hordern 2017). Otherwise, those who leave the programme early end up with no recognition of their achievement.

EPAS should only take place where they add value and not every degree may need an EPA. For example, the role of EPAs has been questioned in both engineering and nursing - in both fields the degree is required for, or contributes to, professional registration, and there is no real additional value in completing the EPA; it becomes an additional hurdle or ‘toll booth’ (Mulkeen et al 2019).

xiii. **Are there any additional ways in which you think the objective to integrate the assessment of degree apprenticeships can be secured?** (free text)

This should be an opportunity to rethink the purpose and necessity of EPAs. The 2017 IAC survey reported that nearly 90% disagree with the introduction of End Point Assessment, although 92% still want formal qualifications to be a mandatory requirement of the new standards[[8]](#footnote-8). Apprenticeships should not be an all or nothing learning programme. Not everything needs to hang on the set of tests or examinations at the end, creating a similar level of pressure to high stakes tests in the academic route.

Instead, learning from high quality technical education systems such as Finland, the units of apprenticeship training could instead be distinct modules, each ending in a proportionate end point assessment enabling apprentices to ‘bank’ individual units and get each module signed off. (Our Plan, 2019).

We should also seize this opportunity to consider prior learning, and allow those with relevant experience to fast track. For example, the Graduate Apprenticeship model in Scotland offers flexible entry and exit points, offering ‘recognition of prior learning’ (RPL) to take into account previous qualifications, skills and experiences. This offers an attractive option for new and existing learners, enabling those with relevant prior experience to complete the apprenticeship qualification more quickly. We would urge IfATE to consider a similar model.

**Change 5 - IfATE will require EPA to include assessment by individuals with appropriate occupational and industry expertise.**

xiv. **Do you agree or disagree with the proposal set out in ‘Change 5’?** [**agree**/neutral/disagree]

xv. **Are there any reasons why you think this proposal will not achieve its intended objective?** (free text)

**Broadly, we support this principle.**

**But we refer back to the points made against Change 2 and would question the overall need for EPAs in every Degree Apprenticeship, preferring instead a flexible and modular approach to assessment.**

**Impact Assessments**

**Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of apprentices? If you have answered ‘yes’ please explain your reasoning. (free text)**

We believe there is more that could be done in general to improve accessibility.

Firstly, there is a lack of easy progression routes from technical and vocational qualifications, including lower-level apprenticeships (Fuller & Unwin 2017, Policy Connect/HEC 2019). This is partly due to decline in level 4 and 5 provision over the last decade, alongside the historical disconnect between further and higher education. In addition, apprenticeship standards can often be viewed in isolation rather than as part of a sequence of progression (UUK 2019). This has resulted in a disjointed system, leading to difficulty for learners in finding information about progression routes and barriers to employers offering multi-level apprenticeships.

To improve this, we support recommendations that have previously been made by the [Centre for Degree Apprenticeships](https://www.mdx.ac.uk/__data/assets/pdf_file/0033/565863/sustainable-degree-apprenticeships-2020.pdf) [Lester and Bravenboer, 2020] to:

* Raise awareness of opportunities to achieve professional status for: under-represented groups; existing workforce; lower-level apprentices
* Promote recruitment strategies to involve more active outreach to increase the diversity of intake both in terms of factors such as ethnicity, disability and social deprivation, and reaching beyond the traditional A-level intake (Burke 2018)
* Promote Degree Apprenticeships as a distinctive, high-quality ‘brand’ (not an ‘alternative’ to higher education)
* Ensure that progression is flexible, by building in more modular ‘step-on’ and ‘step-off’ points through all levels, also recognising prior learning so that learners who already have relevant previous experience can progress quicker

**References**

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Saraswat, A. 2016. Higher apprenticeships and the new apprenticeship standards: perceived potential and limitations. Higher Education, Skills and Work-Based Learning, 6, no. 4, 401-416

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**Annex 1 –** Fuller and Unwin set out a set of desirable qualitative characteristics of ‘expansive’ apprenticeships, whereby off-the-job-training should include time for reflection, and stretch individuals to reach their full potential



1. UUK. 2019. The future of degree apprenticeships. London: UUK [↑](#footnote-ref-1)
2. Engeli, A. & Turner, D. 2019. Degree Apprenticeships motivations research. Cardiff: Wavehill Social & Economic Research. [↑](#footnote-ref-2)
3. WECD (Warwick Economics and Development). 2019. Evaluation of the Degree Apprenticeship Development Fund: report to the Office of Students. Birmingham: WECD [↑](#footnote-ref-3)
4. [edge20e2809320apprenticeships20report2028final20-20web29\_41nXjVp.pdf](https://www.edge.co.uk/documents/87/edge20e2809320apprenticeships20report2028final20-20web29_41nXjVp.pdf) [↑](#footnote-ref-4)
5. OECD, Apprenticeship in England, United Kingdom (2018) [↑](#footnote-ref-5)
6. [final-apprenticeships-and-off-the-job-training-may-2018.pdf (gatsby.org.uk)](http://www.gatsby.org.uk/uploads/education/final-apprenticeships-and-off-the-job-training-may-2018.pdf) [↑](#footnote-ref-6)
7. P35 [edge20e2809320apprenticeships20report2028final20-20web29\_41nXjVp.pdf](https://www.edge.co.uk/documents/87/edge20e2809320apprenticeships20report2028final20-20web29_41nXjVp.pdf) [↑](#footnote-ref-7)
8. AC, “Possibly the best career route in the world?” – The 2017 IAC Survey Research Report (2017) [↑](#footnote-ref-8)