



Apprenticeships Training Providers Consultation

Response from the Chartered ABS

5 September 2016

Apprenticeship Training Providers

Survey: Register of Apprenticeship Training Providers

The Skills Funding Agency plans to create a Register of Apprenticeship Training Providers (RoATP), recognising that a successful employer-led apprenticeship system must be underpinned by a high quality, flexible and responsive provider base. Training providers must apply to join the RoATP if they want to deliver apprenticeships to any employer from May 2017. The RoATP will provide a level of assurance to employers, but employers will also want to assure themselves that a provider is suitable to deliver their apprenticeship training.

Our plans for the RoATP have been informed by our consultation with employers, providers and other stakeholders. We would like to thank these consultees for their valued contributions.

This survey provides an opportunity to comment on our proposals for the RoATP. We will use your comments to hone the final details before we open the Register for applications in the autumn.

We have published our [proposals for the RoATP](#) for your information

There are 14 questions in this survey.

1. What is the name of the organisation or business you are representing?

Chartered Association of Business Schools

2. Are you responding:

- as an individual?
- on behalf of the organisation listed above?

3. Do you agree with the proposal that all organisations wanting to deliver apprenticeship training must apply to the new RoATP, and that they must directly deliver some apprenticeship training themselves? In what instances do you think it might be difficult to move to this and why?

We agree that there should be one register that includes all providers, so far as is practicable. However, it seems nonsensical to require all those currently approved on the ROTO to have to re-apply again. Equally it would be more sensible and economical to require periodic rather than annual re-applications for those institutions already regulated by either Ofsted or the QAA.

4. Do you agree with the proposition that sub-contractors and supporting providers should be limited to delivering significantly less than half of each apprentice's training and therefore receiving significantly less than half of the agreed price for each apprenticeship?

Limiting sub-contracting is viewed to be a good thing, to prevent spiraling costs and poor performance.

5. Do you agree that this proposition should apply to all providers, including employer-providers wishing to act as a supporting/sub-contracted provider to a main provider?

As far as possible that there should be one system applicable to all suppliers. It is important for the reputation and success of apprenticeships that there are no loopholes or inconsistencies.

6. What merit is there of having a separate 'supporting' application route for providers who only have capacity and capability to deliver parts of apprenticeships on a small scale, in support of the main provider's delivery?

As far as possible that there should be one system applicable to all suppliers. It is important for the reputation and success of apprenticeships that there are no loopholes or inconsistencies.

7. Do you agree with the proposal for a separate application route for employers wishing to deliver to their own staff?

As far as possible that there should be one system applicable to all suppliers. It is important for the reputation and success of apprenticeships that there are no loopholes or inconsistencies.

8. Do you agree with our proposals for the financial health test? If not, in what areas would you suggest we amend our approach?

This seems very sensible, although use should be made of other agencies already carrying out this analysis, for example Ofsted and QAA.

9. What specific questions should we ask providers to determine whether they are a high quality apprenticeship training provider?

No comment

10. What evidence of quality, capacity and capability should organisations who are newly established, have no previous experience of delivering apprenticeships or do not have an Ofsted inspection or a review from the Quality Assurance Agency for Higher Education (QAA) on record be asked to provide?

There needs to be a strict quality assurance regime. This can make use of either Ofsted or QAA. There needs to be some external quality assessment regime to ensure that there is a consistency in the standard of provision between the different types of providers.

11. How do we ensure there is sufficient, high quality apprenticeship provision for all employers to access through this register process?

The first concern should be to ensure that all employment areas are covered. Currently this is not the case.

12. Do you agree with our proposal to open the RoATP four times a year? If not, how often should it be open and why?

We would recommend an open system so that new providers can be added as and when they are ready. This is especially important in the initial stages when the government is trying to drive support for apprenticeships.

13. Are there any 'unintended consequences' of our planned approach and, if so, what are they and how can we avoid them?

No comment

14. Do you have any final comments about our planned approach?

Many business schools are at the forefront of higher and degree apprenticeship provision and are keen to support the model. There are ways the systems could be improved to ensure the future success of apprenticeships:

1. currently some degree apprenticeship standards are produced and approved without any involvement of the HEIs. This can result in unworkable programmes. For degree apprenticeships there should be a requirement for 'training' delivery partners to be involved in formulating the standards.
2. Systems at the moment seem to be constructed with FE 'training' providers in mind. A re-design is recommended to take account of HE systems.
3. End point assessments are causing considerable concern. It seems that some organisations are seeing EPA as a money making scheme, while offering little additional value. EPAs should have a charging cap to prevent this and any increase in fees should require convincing reasoning and not just "because we can". Second, consideration should be given to the assumed risk involved in HEIs being able to perform EPA. It is quite difficult to understand why there should be a £9,000, for example, charge for an end point assessor to determine that the degree an HEI has awarded and the skills gained through the employer, are legitimate.
4. There is an urgent request for the gov.uk pages to be updated and kept up to date, and for the information to be made clearer. There should, for example, be a list of Expressions of

Interest, especially once companies begin having to pay the levy. If there isn't already a standard applicable to their needs it would be useful to know if there is one in the pipeline.

5. In terms of the way the funding is allocated we have a number of comments:

a) monthly payments will cause an issue, especially where companies are on the margins of having to pay or not. It could result in apprentices being funded one month and not the next. This leaves 'training' providers open to financial risk.

b) HEIs are in an unusual situation where they are deemed to make a legal contract with a student when offering them a place and yet the funding may never materialise or may be withdrawn with limited notice. This is clearly not acceptable to HEIs.

c) Holding back 20% of the funding until completion is seen as onerous and requires the institution to fund a large portion of the 'training' throughout the life of the apprenticeship and after, potentially four years, to receive the final payment. While it is understood that there needs to be an incentive to encourage completion rates the 20% level is deemed too high. We would recommend a reasonable amount to be 10%.

Finally, please don't use SurveyMonkey for surveys such as this where an organisation-wide response is required. The system does not allow for easy collaboration between colleagues and I have spent an inordinate amount of time putting it in to a different format. Neither does it allow for starting a response and revisiting it or even keeping a copy for our records.