



**Draft strategic guidance to the Institute for
Apprenticeships Consultation**

**Response from the Chartered Association of
Business Schools**

1. The Chartered ABS and its members are supportive of the strategic direction of the Institute for Apprenticeships. However, there are a number of concerns that should be addressed sooner rather than later if the strategy is to produce the desired long term results.
2. First, is the continued focus on FE colleges' mechanisms that do not fit and are not appropriate for degree apprenticeships where reference to HEFCE requirements need to be taken in to consideration. **The apparent lack of experience and expertise of the current senior management in the Institute for Apprenticeships in HE should be addressed as a matter of urgency. There should also be a commitment to retain such expertise for as long as there is a commitment to awarding degree apprenticeships.**
3. It was particularly concerning to hear an employer chair of a trailblazer recently suggest that it did not matter if the definition of a **degree** under the apprenticeship structure did not match the commonly held definition of a degree as awarded by universities. This cannot be right. The IfA must choose if it wishes to acknowledge, respect and accommodate the current definition of a degree, or redefine what is meant by a 'degree apprenticeship' (accepting an inferior product - which would seem to defeat the purpose). If it wishes to continue with degree apprenticeships with the commonly understood definition of a degree, it needs someone with detailed understanding of the HE world to be able to help steer what happens.
4. It is also important that universities and others with taught degree awarding powers are involved in the design of the standards and the assessment for degree apprenticeships from the initial design stage. There are already several degree apprenticeships where the degree element of the apprenticeship is difficult to fit with the standards as written or drafted, because HEIs were not involved at an early stage. Without this we could find a situation where a degree apprenticeship is approved for delivery and funding, but no degree is available at the end of the course. There is already difficulty for HEIs to deliver whilst meeting the competing demands of the different regulators. It is understandable how this situation has arisen; apprenticeships were initially offered up to Level 3, but now that degree apprenticeships are offered the mechanism needs to be suitably adjusted.
5. **Better guidance is also required to reduce and prevent confusion amongst teachers, students, parents and employers about what elements of an apprenticeship are part of the degree and what parts are not.** There is already confusion where a person with a level 5 professional qualification believes that this creates a short cut to the degree. Degrees have a specific structure requiring 360 credits, with at least 120 credits at level 6. There needs to be very clear communication while a degree may also confer a professional qualification it cannot be assumed that a professional qualification confers a full or partial degree.
6. **There also needs to be an understanding, and therefore use made, of External Quality Assurance processes already undertaken in degree programmes.** This is a practice with which HEIs are very familiar and have long been required by HEI regulators, hence consideration should be given to allowing HEIs to externally assess programmes from other institutions. It is extremely unlikely that the professional bodies, for example, will be better placed to decide on whether a programme is acceptable as a degree. An alternative model for degree apprenticeships would be for HEIs to form part of the external validation of programmes. Universities have been delivering programmes which include fully assessed

work-based learning for decades and are well versed in how it is done and what quality assurance mechanisms are required. There is much that could be learnt from what is already happening. We would be happy to discuss this in greater detail.

7. We would encourage you to consider the experience and expertise of **business schools** in working with employers to create programmes that fulfil their needs. This is a particular area of strength as it is part of their *raison d'être*. This experience should be used, not ignored.
8. Another aspect **that the IfA should have particular focus on is EPAs (End Point Assessors)**. There are current apprenticeships being taken where there is not yet an EPA to confirm that an apprenticeship can be awarded. This causes difficulties for those delivering the programme. Just as concerning is the monopoly situation where there is only one EPA, which can be and is being exploited. The IfA must have an explicit remit to police against organisations charging more than is reasonable because of this monopoly situation. Providers are already being pressured to appoint EPAs on registration and to commit to paying fees four years before the assessment will be required. There are even reports that unless such forward commitment from the provider is given, the body will hold back vital pieces of paperwork from the HEI provider. There are also reports of professional bodies dramatically increasing the fees associated with various elements linked to the apprenticeships. It is unsure if the IfA has any influence on such matters, but guidance would be welcomed.
9. **A final aspect that highlights the need for the IfA to have HEI experience at both executive and board level is funding which has not been set up for long term programmes like degrees.** The expiry date of vouchers is one issue and the 20% success element is another. There is currently no mechanism for the 20% success fee to be set aside on a monthly basis for employers. Instead it will be taken in a single lump sum on completion. As vouchers expire after 2 years, for programmes longer than this (e.g. a 4-year Degree Apprenticeship), there is no way for the employer to fully “pay as they go” or even budget effectively as the 20% for students starting in year 1 will have expired before the completion date.
10. The Chartered ABS and its members are fully supportive of degree apprenticeships but the above concerns must be addressed if they are to succeed in the long term and produce the results the Government desires. If these concerns are not addressed it is very likely that relevant stakeholders will cease to, or dramatically reduce, the additional effort required to make them work.

About us

The Chartered Association of Business Schools is the membership body of the UK's business schools. Business Schools have been amongst the first areas in universities to support the delivery of degree apprenticeships and therefore the comments above come from experience and from a perspective of wanting to make degree apprenticeships work for all.

Anne Kiem

Chief Executive

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