



**IfATE consultation on degree apprenticeships**  
**Response from the Chartered Association of  
Business Schools**

12 October 2021

## Change 1 – Better supporting graduate-entry occupations

**IfATE Proposal** - 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. In doing this, if they wish to, employers will be able to mandate degrees in apprenticeship standards that will be occupationally specific for graduate-entry occupations at level 6 and level 7.

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

**Chartered ABS response:** Agree

- ii. Do you agree or disagree with the proposed evidence base (as outlined in point 1 above) on which the Institute will evaluate whether an occupation is a graduate occupation suitable for a degree apprenticeship?

**Chartered ABS response:** Agree

- iii. Is there other evidence the Institute should consider in its evaluation of whether an occupation is a graduate occupation suitable for a degree apprenticeship

**Chartered ABS response:** We broadly agree with the proposed evidence base but there needs to be a requirement that employers demonstrate what will be the added value of an apprenticeship becoming a degree apprenticeship. Trailblazer groups should be required to consider this and to demonstrate the value-added element. However, they may need guidance as to the meaning of "value-added" and how to demonstrate it. HEIs should be able to provide input during the early stages of the decision-making process as to whether to mandate the degree. Their input should be included in the Trailblazer groups to ensure that the KSBs developed for the degree translate into appropriate learning outcomes.

Employers will need external bodies to validate and help guide their design using current labour market data as supporting evidence. Furthermore, some medium sized employers will not have the resources to devote time to this bespoke degree design. In some sectors, employers may be able to put forward a case that inclusion of a degree could help ‘professionalise’ practice in an occupation. Evidence from PSRBs is also important to consider in the evaluation process.

- iv. Are there any reasons why you think this proposal will not achieve its intended objective?

**Chartered ABS response:** Without asking Trailblazer groups to consider the value-added element there may be a lot of requests which are then turned down. Employers might also need to be educated as to the value of degree apprenticeships - they may still view them as inferior to traditional degrees.

## Change 2 – Integration of on-the-job and off-the-job training

**IfATE Proposal** - Degrees within a degree apprenticeship should fully integrate with the on-the-job training and development that apprentices experience in the workplace. Providers should therefore ensure that off-the-job training (the degree) complements and integrates with on-the-job experience in the workplace (provided by the employer). This expectation will inform the ways in which degree apprenticeships are developed by trailblazer groups, and we will also provide better guidance about how employers and training providers are expected to integrate training delivered on- and off-the-job. This reflects good practice already delivered in many degree apprenticeships, and we would like to make this the norm.

- v. Do you agree or disagree with the proposal set out in ‘change 2’?

**Chartered ABS response:** Agree

vi. Are there any reasons why you think this proposal will not achieve its intended objective?

**Chartered ABS response:** A lack of guidance, support mechanisms and materials for employers will be the biggest potential risk to the adequate integration of on-the-job and off-the-job training. There is also a risk that some employers may not be fully committed to the programme and therefore will not provide adequate on-the-job training. More clarity is needed as to the 'practical learning period' defined in the EFSA's Funding Rules and how this may impact on the financial viability in delivering integrated degree apprenticeships.

vii. Are there any additional ways in which you think the objective to integrate on- and off- the-job training can be achieved?

**Chartered ABS response:** Further integration is needed to align taught and on-the-job experiences. Employers need to commit to this and provide the apprentices with opportunities for off and on-the-job training. Any support to help employers and providers bridge the two can only be welcome, but clear guidance, suggested assessment tools, marking/feedback rubrics, and support to employers in understanding how to measure the impact of on-the-job, and how to give effective feedback to employees, should be created and offered by providers.

Support from the provider for the workplace mentor/tutor and staff involved in delivery will be important, and should include training for employers in how to assess performance. There will also need to be co-ordination in the timing of the off-the-job learning so that it supports the on-the-job experience. It will also be important for good practice to be shared and promoted amongst providers and employers, and the IfATE should play a role in ensuring that best practice is disseminated and adhered to by providers.

### **Change 3 – Alignment between apprenticeship and KSBs and degree learning outcomes**

**IfATE Proposal** - In support of change 2 we will require that the learning outcomes of any degree mandated in an apprenticeship standard will reflect the requirements of the occupation through alignment with the knowledge, skills and behaviours (KSBs) in the employer-specified occupational standard. As with change 2, this is already best practice in some degree apprenticeships. This will require Higher Education Institutions (HEIs) to develop and validate degrees specifically aligned to the apprenticeship standard, noting that this may already be the case for some regulated occupations.

viii. Do you agree or disagree with the proposal set out in 'change 3'?

**Chartered ABS response:** Agree

ix. Are there any reasons why you think this proposal will not achieve its intended objective?

**Chartered ABS response:** For this proposal to achieve its aim there will need to be effective working partnerships between Trailblazer employers and HEIs. The latter should include a diverse mix of HEIs and ensure there is a consensus that the KSBs can be achieved. It is also important that there is an adequate notice period when changes to Standards are made as these take time to amend and the timescales set need to take this into account.

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.

**Chartered ABS response:** Emphasis should be placed on the KSBs which employers value most in relation to a person being a well-rounded employee with a positive work-ethic. The perception of

KSBs should be elevated from "ticking a box" to a status of identifying talented employees, thus helping them be recognised as central to professional development. This is another area where the sharing of information and approaches will be welcomed, such as through supporting documents, webinars and closer working relationships with accredited bodies such as the Chartered Management Institute. If implemented we would hope that this proposed change will reduce duplication of effort in assessments/evidence-gathering.

#### **Change 4 – Integration of assessment**

**IfATE Proposal** - Changes 2 and 3 will align degree achievement and learning for occupational competence. As a result we will approve degree apprenticeships only where the end-point assessment (EPA) of occupational competence in a degree apprenticeship will integrate with the final assessment of the degree. The objective is to ensure that neither the degree nor the apprenticeship can be awarded in isolation from the other, with the EPA acting as a capstone for both.

xi. Do you agree or disagree with the proposal set out in Change 4?

**Chartered ABS response:** Agree

xii. Are there any reasons why you think this proposal will not achieve its intended objective?

**Chartered ABS response:**

For this intended objective to be achieved there will need to be sufficient detail as to the nature of the External Quality Assurance (EQA) role for the OfS/QAA in relation to integrated Degree Apprenticeship End Point Assessment. The HEI sector must be given adequate opportunity to provide input on the proposed model and implementation plan.

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

**Chartered ABS response:** We agree that this change is crucial for increasing the relevance of degree apprenticeships and enabling the apprentice to add practical value for their organisation. It is worth exploring more fully the scope to integrate the EPA further into the degree apprenticeship rather than it being seen as an addition and 'bolt-on' to the programme. This may require adding further resources to support the EPA element within the programme. In order to identify potential duplication, it would be helpful to explore how providers are currently conducting assessments, and highlight the amount of duplication that could be removed through integration. Overall it is crucial that the quality assurance system – both QAA and Ofsted – is incorporated within the framework governing the integrated approach.

#### **Change 5 – Participation of an independent assessor with occupational expertise**

**IfATE Proposal** - We will require the integrated EPA of all degree apprenticeships to include assessment by trained individuals with appropriate occupational and industry expertise. All assessment panels will be required to have at least one suitable individual who is independent of the HEI. In line with existing good practice in many HEIs, this will assist with securing the occupational specificity of assessment by mitigating the potential conflict of interests present in integrated degree apprenticeship assessment and drawing in an occupational perspective.

xiv. Do you agree or disagree with the proposal set out in 'Change 5'?

**Chartered ABS response:** Agree

xv. Are there any reasons why you think this proposal will not achieve its intended objective?

**Chartered ABS response:** Academic institutions are very accustomed to the use of independent assessors on their internal assessment processes. To ensure confidence in this proposed approach it is important that providers and employers have confidence that assessors are truly independent and have the skills and experience to verify their work.

xvi. Are there any requirements that the Institute should lay out for the appointment of independent assessors with occupational expertise?

**Chartered ABS response:** Assessors should be appointed using a fair and transparent approach with a degree of visibility which demonstrates not only their independence but also that they have suitable skills and experience. The appointment process could follow the existing PSRB approaches and QAA requirements in accordance with the external examiner system as well as existing RoEPAO requirements. It is worth considering making the requirements explicit in the apprenticeship EPA plan.

#### **Implementation outline based on assumption of agreement**

xvii. Do you have any concerns or foresee any problems with the timeline as set out?

**Chartered ABS response:** The pandemic has altered working patterns and also shaken up the labour market which might mean that these proposals are not seen as an immediate priority by Trailblazer and other employers. We would again like to highlight the importance of providers being given sufficient time to deliver or re-adjust to any changed Standards.

#### **Impact Assessment**

xviii. Do you believe the proposed arrangements (any or all) would have a positive impact on particular groups of apprentices?

**Chartered ABS response:** Yes

xix. If you answered 'yes' to question 1 above, please explain your reasoning.

**Chartered ABS response:** Provided that the arrangements will lead to degree apprenticeships being perceived as equitable to degrees then these changes will impact on those who for whatever reason have not been able to benefit from the traditional degree system. This would hopefully lead to increased social mobility over the longer-term.

xx. Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of apprentices?

**Chartered ABS response:** No

xxi. If you have answered 'yes' to question 3 above, please explain your reasoning.

**Chartered ABS response:** None

#### **About the Chartered ABS**

The Chartered ABS is the voice of the UK's business and management education sector and our members consist of 121 business schools and higher education providers across the UK, as well as affiliate stakeholders, corporate members and international partners.

The UK's business and management education sector produces vital research for example how best to disseminate new technologies to SMEs; the impact of the current crisis on front line workers; calculating the trade-off between short and long-term benefits in policy-making; informing policy to tackle corruption in professional sports; transforming palliative and end-of-life care for service users; cutting carbon footprints in the service sector.

Business and Management represents 1 in 5 university students and contributes £3.25bn to the UK economy. Its management students go on to lead global businesses and its entrepreneurs contribute to our dynamic economy. Its research has an impact across society and helps to turn our capacity for invention into viable businesses.

While MBAs may enjoy the highest profile of all business school programmes, they make up a very small proportion of what business schools do. In terms of student numbers, MBAs make up less than 5% of the over 325,000 students studying in business schools in the UK, and this doesn't take in to account short programmes, often offered under the umbrella of Executive Education, which caters for an increasing number of open and bespoke programmes delivered to employees in both large and small firms.