



**Institute for Apprenticeships and Technical  
Education (IfATE) consultation on updates to the  
criteria for mandatory qualifications in  
apprenticeships**

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

17<sup>th</sup> February 2023

**Q1: To what extent do you agree that qualifications should only be mandated where they fulfil a regulatory, professional body, or labour market requirement?**

*Chartered ABS response:* Strongly disagree

*Please provide any additional comments or information:* Our member business schools feel that there should be flexibility around what qualifications can be mandated – employers want someone with evidence of current KSBs. A mandated qualification that could not easily be changed could become terminally misaligned with the market and require providers to deliver a qualification which no longer exists. We question how workable these proposals are going to be over time.

Trailblazer groups, if properly constituted, should be listened to when they determine that a mandatory qualification is best included in a standard, and making it more difficult to include qualifications, by raising the bar for requirements, will clearly have a negative impact. While we acknowledge that this consultation relates to apprenticeships at all levels other than degree apprenticeships, our members are nevertheless concerned about the potential that changes here may influence degree apprenticeships policy in the future.

**Q2: To what extent do you agree that qualifications which provide ‘fuller occupational coverage’ or provide structure for off-the-job training should not be mandated on this basis alone?**

*Chartered ABS response:* Disagree

*Please provide any additional comments or information:* We question why it should be more difficult for Trailblazer groups, in what is supposed to be an employer-led system, to justify their expertise and insights. We already have a very rigorous multi-agency quality assurance system to identify inappropriate training provision and it is not necessary to second-guess employers at this stage.

**Q3: To what extent do you agree with our approach to include more specific evidence criteria when mandating a qualification due to regulatory or professional body requirements?**

*Chartered ABS response:* Strongly disagree

*Please provide any additional comments or information:* The proposals don’t give enough trust to the trailblazers groups which already represent a functioning marketplace of employers able to judge the suitability of apprenticeships and mandated qualifications. In discussions with our members it has been pointed out that there is already strenuous and rigorous regulation of apprenticeship programmes by a variety of bodies: EFSA (VFM), Ofqual (learning experience), and EQA (end-point assessments) to ensure that low quality programmes are identified. We believe that the bar has already been set high enough.

**Q4: To what extent do you agree with our proposals for requiring evidence of labour market demand for a mandatory qualification?**

*If ATE:* We have made some suggestions of the kinds of evidence we would expect to see submitted – in your response, we would be interested to hear of other sources of evidence which could be used to evidence employer demand.

*Chartered ABS response:* Disagree

*Please provide any additional comments or information:* Our members believe that the Trailblazer groups are there to inform us as to what the needs of industry are and we’re not convinced that an additional requirement is needed in this regard.

**Q5: To what extent do you agree that where a qualification has not been approved through any current or future approval process, that outcome should inform decisions about its suitability for use in an apprenticeship?**

*Chartered ABS response:* Neither agree nor disagree

*Please provide any additional comments or information:* Past decisions related to the approval of a qualification should be a factor in informing decisions about its suitability for use in an apprenticeship. However as noted in the consultation document, the application of this principle should not be overly prescriptive. It should also be noted that the role and variety of qualifications in standards is vast and we would caution against corraling them into specific and partial approval processes.

**Q6: To what extent do you agree that a qualification mandate should specify exactly which qualifications can be used to fulfil the mandate?**

*Chartered ABS response:* Strongly disagree

*Please provide any additional comments or information:* The proposals don't allow for the type of flexibility that the market would require – they advocate a standard product delivered in a standard way. How often would the qualification mandate be reviewed for relevance of the qualifications to employer needs and industry changes? At present the only qualifications which cover all or some of an apprenticeship standard are HTQs. The proposals will require specific types of qualifications to be named which will be difficult. Our members also have concerns that the qualification mandate might reduce the opportunity for breadth and depth in an apprenticeship as providers might not be able to go beyond the standard, thus reducing the benefit that learners derive from the apprenticeship.

**Q7: To what extent do you agree that qualifications should align with, and not go wider than, the KSBs set out in the occupational standard?**

*Chartered ABS response:* Agree

*Please provide any additional comments or information:* While this is a sensible proposal, apprenticeships are already designed on the principle that training which is not directly developing the KSBs cannot be funded so we question what additional value this requirement would offer.

**Q8: To what extent do you agree that mandated qualifications should be at the same or lower level as the apprenticeship?**

*Chartered ABS response:* Agree

*Please provide any additional comments or information:* We agree with this idea but given the breadth and variety of qualifications and scenarios, it is difficult to be completely sure or to anticipate all possible situations now. We would again suggest placing trust in the Trailblazer process in each specific case.

**Q9: To what extent do you agree that where possible, a qualification should be integrated into the EPA?**

*Chartered ABS response:* Agree

*Please provide any additional comments or information:* Integration of the assessment for the mandatory qualification with the EPA would be positive because it would help ensure that learners undertake the EPA and hopefully reduce instances of over-assessment. However, we would be

concerned if integration of the qualification with the EPA was to result in an even longer gateway period.

**Q10: We have identified some scenarios in which integration might not be appropriate or possible. If you have further examples, please provide details to support our policy development around integration.**

*Please provide any additional comments or information:*

**Q11: To what extent do you agree that all integrated assessments should assess the same subset of KSBs?**

*Chartered ABS response:* Disagree

*Please provide any additional comments or information:* We believe this proposal is likely to be unworkable given the risks of qualification changes over time. Many of these qualifications are owned and managed by third parties and there is no way for the apprenticeship system to control them at an individual/specified level.

**Q12: To what extent do you agree that the defined subset of KSBs cannot be assessed by multiple smaller qualifications?**

*Chartered ABS response:* Disagree

*Please provide any additional comments or information:* This is again attempting to create a much too complex set of rules, which cannot possibly account for the range of employer needs, rather than accepting the Trailblazer process.

**Q13: To what extent do you agree that only one subset of the KSBs should be identified for assessment by integrated qualifications?**

*Chartered ABS response:* Disagree

*Please provide any additional comments or information:* See comment to previous question.

**Q14: We have set out our preferred approach to integration and one we know to work. We would welcome your thoughts on how this approach might work for you and any alternative modes of integration you might wish to propose.**

*Chartered ABS response:* This should be approached via the Trailblazer process in relation to the specific context of the particular standard under development or review. The Trailblazer should be encouraged to consider both the opportunities and the risks of integration in their own unique context. There should not be a one-size-fits-all edict.

**Q15: To what extent do you agree that the EPA's assessment plan should indicate which of the integrated qualification's grade boundaries should attest to occupational competence?**

*Chartered ABS response:* Disagree

*Please provide any additional comments or information:* This seems far too complex and detailed and we're unsure as to what problem it is attempting to address. There is no means of preventing the owner of a third party qualification from amending the way they mark an assessment mid-cycle, raising questions as to how such a scenario would be addressed if specificity had been placed into the standard/assessment plan.

**Q16: To what extent do you agree that awarding bodies setting the qualification's integrated assessments is the best way to protect the independence and reliability of the EPA?**

*Chartered ABS response: Agree*

*Please provide any additional comments or information: We agree with this principle but we already have an entire quality system devoted to inspecting and ensuring the independence and reliability of the EPA.*

**Q17: To what extent do you agree that it is fairer to apprentices if we do not allow awarding bodies to permit centre adaptation of an integrated qualification's assessments?**

*Chartered ABS response: Disagree*

*Please provide any additional comments or information: Such inflexibility might not be advisable as shown by the pandemic and the many examples of adaptation that were needed as a result of social distancing.*

**Q18: To what extent do you agree that, for integrated written and on-screen assessments, at least one assessor must be independent in accordance with the description in the proposal?**

*Chartered ABS response: Agree*

*Please provide any additional comments or information: Again, this is sensible in principle but there is already an extensive policy around the independence of EPA assessments so we're not sure of the need for new legislation in this area.*

**Q19: To what extent do you agree that integrated practical assessments must be conducted by a person suitably qualified to make assessment judgements, but who has no vested interest in the apprentice's or the assessment's outcomes?**

*Chartered ABS response: Agree*

*Please provide any additional comments or information: See comment to previous question.*

**Q20: To what extent do you agree that, where such arrangements would present significant challenges to a centre, the tutor who has delivered the content may deliver the integrated assessment, provided they are joined by at least one other assessor who is sufficiently independent. Please provide examples of any potential challenges in your response, where applicable.**

*Chartered ABS response: Agree*

*Please provide any additional comments or information: See comment to previous question.*

**Q21: To what extent do you agree that assessments must be marked or graded by the awarding organisation, independent persons appointed by the awarding organisation, centre staff with sufficient independence, or a combination of the above?**

*Chartered ABS response: Agree*

*Please provide any additional comments or information: See comment to previous question.*

**Q22: With reference to the General Impact Assessment (Section 4.1), are there any other impacts, including costs, savings or benefits, which we have not identified? Please provide examples, data and/or evidence where possible.**

*Chartered ABS response:*

*Please provide any additional comments or information:*

**Q23: With reference to the General Impact Assessment (Section 4.1), are there any additional steps that could be taken to mitigate any negative impact, resulting from the proposed approach to approvals? Please provide examples, data and/or evidence where possible.**

*Chartered ABS response:*

*Please provide any additional comments or information:*

**Q24: With reference to the Equality Impact Assessment (Section 4.2), are there any other potential impacts (positive or negative) that have not been identified? Please provide examples, data and/or evidence where possible.**

*Chartered ABS response:*

*Please provide any additional comments or information:*