



GuildHE Response

HE Commision: Degree Apprenticeships Inquiry October 2018

About GuildHE

GuildHE is an officially recognised representative body for UK Higher Education. Our members include universities, university colleges, further education colleges and specialist institutions from both the traditional and private (“for profit” and “not for profit”) sectors. Member institutions include some major providers in professional subject areas including art, design and media, music and the performing arts; agriculture and food; the built environment; education; maritime; health and sports.

Opening Comment

We believe the principle of direct employer contributions to the cost of higher level technical education through the levy is correct and that good quality degree apprenticeships will help transform the supply of skills and so boost productivity. But their development is being held back by unrealistic and apparently arbitrary decisions about funding and the slow rate of progress in agreeing new apprenticeship standards. And they are not a panacea - they work best for big employers. Sectors dominated by micro-businesses and self-employed professionals like the creative industries will continue to rely on existing, industry-standard degrees.

Many of GuildHE’s members offer a variety of technical and professional education in partnership with employers, some of which has been undertaken through the apprenticeships system. Whilst degree apprenticeship numbers are low across England, there is significant employer demand for provision in many sectors. Yet the implementation of the policy has not caught up with this demand, and the regular changing of the rules around higher and degree level apprenticeships has been both confusing and off-putting to employers, and the HE sector.

GuildHE together with Universities UK, UVAC and the university mission groups of HE have worked collaboratively to try and solve some of the implementation challenges for our members and have ourselves been involved in the trailblazer process as representatives of HE employers. We have all regularly consulted with DfE and ministers on some of our major concerns, but feel these are not being properly heard or responded to. Employers that we work with really value higher level skills and were excited about working with the HE sector in developing high-quality, employer-centred qualifications. But in reality HE providers are unable to engage properly with the trailblazer process, and employers struggle to articulate their requirements fully and lack of understanding of the levels of qualifications on both the FHEQ and QCF. Working with both qualifications frameworks further compounds this employer confusion at level 4+.

The IfA also has no representative from a HE awarding organisation on its board, and not all Route Panels who sign off higher and degree level standards have HE representation either. We, therefore, have little confidence that the IfA understand the established, world-class UK

HE system and its quality and standards requirements. Improving the quality and prestige of the apprenticeship brand was a key objective of the reforms and driving fees down and removing qualifications is likely to have the opposite effect at all apprenticeship levels.

We hope our response to you call for evidence will be useful in understanding the major challenges and opportunities for the engagement of HE providers in this policy area.

1. How do degree apprenticeships fit into the overall structure of tertiary (post-level 3) education and training, and is their formal relationship with other awards and pathways clear?

We feel that Level 4+ provision is overly complicated. Having two qualifications frameworks, one run by the HE sector, regulated by the OfS, quality assured by the QAA (the FHEQ) and funded by the student loan system - and another one by the FE and private training providers, regulated by OFQUAL, quality assured by Ofsted and funded by the ESFA or private contributions (QCF) make the landscape too complex even for education providers to understand. The QCF and FHEQ are not of comparable academic rigour, and many of our members struggle to offer credit to applicants who hold a QCF L4+ qualification onto their degree programmes (and L6 Apprenticeships).

We believe that there is a false premise that universities only provide 'academic' programmes, and technical and vocational education offers no 'academic' content and vice versa. A good quality programme, worthwhile to employers, will have a good balance of practical and theoretical knowledge transfer, and UK HE providers have been undertaking these sorts of programmes for hundreds of years. Our members in both the HE and FE sector pride themselves on providing employer relevant education at degree level, and this is achieved through a traditional degree, part-time work based HE, and now through the apprenticeship route. Frequent changes to the FE and skills system, the politics of HE vs. FE, the false academic vs vocational argument, and the relationship between the ESFA and the HE sector bodies seem to be some of the main reasons why we do not have a coherent tertiary education system. The DfE review of Level 4 and 5 provision has highlighted these as key issues to be resolved, but as yet we have seen no solutions to what are systemic problems between the two parts of post-18 education.

Because of these issues, we believe the rollout of the Degree Apprenticeship (and subsequently Degree 'level' apprenticeships) have been adversely affected, and the IfA have taken a number of decisions that have negatively impacted the HE sector's engagement in the policy. These relate principally to how the trailblazer process works, the removal of qualifications from standards, the approach to endpoint assessment and the funding bands assigned, but include many others which do not work in the interests of improving the quality of apprenticeships, or the engagement of the HE sector. Our response to the next question will provide more detail on each of these.

We are also concerned at the lack of built-in progression routes developed by trailblazers. The growth of degree apprenticeships should be seen as complementary, not detrimental, to the development of apprenticeship standards at lower levels. For some professions, it may

well be good practice to develop standards at all levels from 2-7 as stand-alone or integrated programmes, yet to date, this transition has not been in the forefront of trailblazers minds. This may be a consequence of standards being linked directly to specific job roles, rather than to a person's progression through their chosen industry. The lack of understanding by employers of the FHEQ and the QCF compound this issue and employers and the IfA are not best placed to offer advice on this - those who validate those awards but are not able to be actively engaged in the development of apprenticeship standards. We, therefore, wish to see a much more joined up and thoughtful approach to set qualification standards (especially when the apprenticeship itself does not have an integrated qualification component) in order to support education providers and other employers in understanding the 'value' of the holder of an apprenticeship, and to support the employee's future training needs.

2. What have been the major challenges establishing degree apprenticeships for providers/employers?

Integrated qualifications

The faster better programme has had a significant detrimental effect on the interest in Level 4+ apprenticeships from employers and HE providers. This is because of the arbitrary decisions from the IfA relating to integrated qualifications. Employers and learners like degree apprenticeships because they have a degree at their core, it is a benchmark and an internationally recognised transferable qualification that denotes a particular level of ability and skill. If IoA continues to try to remove degrees from apprenticeships, many employers will walk away and learners will lose the value of an established brand. Tensions in trailblazers on this issue have emerged on a number of occasions including Digital, Public Sector worker, and construction to name a few. The HE sector itself was left with no option but to remove a level 7 qualification from its own academic professional apprenticeship as otherwise the IfA wouldn't approve it- even though holding the L7 qualification is now the industry standard and is overseen by a professional body. It is unacceptable for the IfA to gamble on the validity of the apprenticeship as an academic/technical qualification in its own right - when in reality, an apprenticeship standard without any formal qualifications is really just a competency framework because the learning will only specifically relate to the job trained for and lacks wider career relevance.

Trailblazers

We have quite a few concerns with the trailblazer process. Firstly, it is overly secretive. There should be a public record of the progress being made in standards being developed. Our members report that employers are confused about the process and how (or whether) to bring their own sector (or occupation) together to develop standards. This is especially the case where there is no professional body used to coordinating education and skills on behalf of its industry. The secretive nature is also problematic when employers have spent time and significant finances on developing their own trailblazer, only to be told midway through the process that the draft standards developed were too similar to another trailblazer in another industry. This has been the case for another of the HE sector standards - technician,

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where the trailblazer was told after 12 months of deliberation and sector-wide consultation that it had to team up with the NHS and both had to compromise on the contents of the standard to make it fit. How would SMEs know when or how to get engaged in the development of a standard that they might like to run? How would a large employer outside of the 'click' of big government engaged employers contribute to the development of standards linked to their industry? The secrecy is developing a hierarchy where only the largest and those with the most resources are able to steer the training opportunities for the whole of its sector (and often beyond its direct competitors).

Secondly, the judgement of professional bodies is being ignored by the IfA. The Route Panels do not have the breadth of experience in the industries they operate in - and are just the opinions of a collection of employers.

Thirdly, trailblazers are very time-consuming, take months and years to complete and are not well supported. Some employers will be unable to spend their levy allocation in the first 24 months because the standards they need (at all levels) are not available. HEIs with degree awarding powers are not able to be involved in the development of standards - even when they have been delivering versions of these qualifications for a long time, and having only one university present during the development of the assessment plan provides a competitive advantage to that institution. Many employers really have very little idea of the differences between the two qualifications frameworks, or even the difference between a L4, L5, and L6 course in some instances. The IfA also have no staff with the experience of managing HE provision, and can offer no guidance themselves. Trailblazers need to be far more supported in understanding the 'academic' standards of different levels of qualification, especially with the introduction of Level 6 non-degree apprenticeships.

Recruitment and selection

There are a number of challenges with the recruitment process of Degree Apprentices. Firstly the responsibility sits firmly with the employer - it is a job first, study second, approach. This is fine, but the IAG provided in schools and colleges must also support the student to have the necessary skills to be successful in a job interview process. Schools and colleges spend far more time supporting students through the UCAS application process, which means that those who want to undertake degree apprenticeships are left out. Applying for a degree apprenticeship is very complicated for both the employer and the prospective apprentice.

Secondly, although the employer should be working with the HEI in ensuring their recruits have the pre-requisite qualifications, this is often challenging, especially when those previous qualifications are on the QCF and are not A'Level's, GCSE's or BTEC's.

Thirdly, employers often work to different timelines than the university. Sometimes this means they miss out on recruiting from school leavers who could have chosen university or a degree apprenticeship, and often means the apprentice induction into the academic part of their apprenticeship is not aligned with the full-time, or part-time university cohort.

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It is yet to be seen the extent to which a degree apprenticeship route will unlock opportunities for HE study to those who would not have traditionally attended university. Those with a disadvantaged background continue to be disadvantaged in the current apprenticeship recruitment process: it depends on where you live; IAG is poor; you may not have good interview skills or have appropriate clothing to attend an interview; employers don't have to recruit those from disadvantaged backgrounds; and there is a risk of 'middle class capture'.

Funding bands

The ifA has made perverse and inconsistent decisions in relation to funding bands. Funding bands should reflect the cost of providing the course not just what the IfA are willing to pay for the provision. Throughout the rollout of the Apprenticeship Levy, employers were told it was their money and they would have the power in how it was spent. This is not the case and because of the Levy, employers have very little additional money to top up any shortfalls in costs.

UK HE is world renowned, with staff and facilities at the forefront of innovation. This costs money. The non-standard delivery of apprenticeships also costs additional money to run. HE has a historic and effective costing model. If universities are unable to deliver standards in line with their costing they will simply disengage with delivering Apprenticeships. HE providers are not interested in diluting their brand by delivering sub-standard qualifications at a discount price, and may cease delivery because costs are not being covered.

EPAs

A sticking point in relation to funding is the holding back of 20% for the End Point Assessment. Whilst Degree Apprenticeships have integrated EPAs - Degree 'level' Apprenticeships do not. This adds additional costs per student to the HEI delivering the apprenticeship and takes away a large chunk of funding. The EPA in many cases does not cost 20% of the delivery and so this hold back is arbitrary. Where there is a sole licenced EPA organisation, this creates a monopoly and significantly increases the fees for the EPA.

Quality assurance and data

We have been actively involved in discussions with the OfS, QAA and Ofsted on how Degree Apprenticeships should be quality assured. It is complicated at L4 and L5 and even to an extent at L6 which is off-putting to providers.

The ESFA processes are alien to most HE providers, and during the registration process to go on the list of registered apprentice providers it was clear that the language of HE and FE is very different. Having to run two different quality assurance and data submissions processes are overly burdensome for HE providers, especially those GuildHE represents.

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We are glad the OfS and ESFA are making progress in data sharing, but the sector is concerned about the additional burden of running two different quality processes.

Whilst the recruitment and selection of the apprentice is the responsibility of the employer, it seems the balance of burden on the ongoing quality of the activity is placed solely on the training provider. This is especially true when ensuring that employers abide by the 20% off the job rule where HEIs are solely responsible for recording, monitoring and enforcing. This is not an acceptable position to be in and employers must be equally accountable for the quality of the experience for the apprentice.

We also note the mantra of the policy being 'employer led' is at odds with the HE mantra of 'for the student'. Putting the interests of the employer above the needs of the student does have negative effects on the success of Degree Apprenticeships, and is at odds with how the OfS will be regulating providers.

Non-levy engagement

Another significant issue in the policy rollout has been how non-levy payers are able to engage in hiring apprentices. Many of the rural and coastal regions our providers operate in are dominated by SMEs. These SMEs often feel disengaged from the process and that government has no interest in supporting them to grow their businesses. This has a huge impact on the regional skills growths of these SME rich areas.

3. How far are degree apprenticeships, on the basis of developments to date, providing an effective contribution to meeting the economy's skills needs, and doing so in a way that offers value-for-money?

Degree apprenticeships could have huge positive benefits for local skills growth. But until more providers are able to be involved in developing standards, SMEs are able to draw down funding and also contribute to the development of standards in a meaningful way, and school leavers are provided with the right IAG for all of their options post-18; the policy will continue to fall a long way short of its aims.

We need to be careful that the definition of value for money here is not just 'cheap to deliver'. Short term, the student could be getting better value for money by doing a degree apprenticeship instead of a university degree, because they will have no student debt but we do not believe that such a stark difference in funding incentives between the two routes is sustainable in the long term: this is something that the Post-18 review should address. We accept that the IfA has a role to play in ensuring employers spend their money wisely, but its prescriptive approach to funding bands is detrimental to the quality of what can be delivered at degree level. The levy has dramatically reduced employers options in how they train their staff, both in terms of content and cost - this is fundamentally unfair.

It is important to remember that not all industries are able to use their levy money at present because apprenticeships don't meet their training needs (such as in the creative industries).

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We, therefore, believe that the levy should also be used for FHEQ qualifications where there is no standard available - or where no standard would be able to be developed to ensure that employers are able to invest in the skills developments they truly need.

Contact

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