The Future of Apprenticeships in England: Next Steps from the Richard Review

March 2013
Annex A: Response Form

The Future of Apprenticeships in England: Next steps from the Richard Review

Response form

The Future of Apprenticeships in England: Next steps from the Richard Review can be found at:


You can complete your response via the online survey

The closing date for the consultation is Wednesday 22 May 2013.

Alternatively, you can complete the response form by email or by post. The email and postal addresses are:

Celia Romain
BIS/DfE Joint Apprenticeships Unit
Department for Business Innovation and Skills
Orchard 1
1 Victoria Street
London
SW1H 0ET

Email: apprenticeships.consultation@bis.gsi.gov.uk

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.
Confidentiality and data protection

Please read this question carefully before you start responding to this consultation. The information you provide in response to this consultation, including personal information, may be subject to publication or release to other parties. If you do not want your response published or released then make sure you tick the appropriate box?

☐ X Yes, I would like you to publish or release my response

☐ No, I don’t want you to publish or release my response

Your details

Name: Geoff Holden

Organisation (if applicable): City & Guilds

Address: 1Giltspur St London EC1A 9DD Telephone:
Fax:

Please tick the boxes below that best describe you as a respondent to this consultation

☐ Business representative organisation

☐ Independent Training Provider

☐ College

☐ X Awarding Organisation

☐ School

☐ Charity or social enterprise

☐ Individual

☐ Legal representative
Local government
Large business (over 250 staff)
Medium business (50 to 250 staff)
Small business (10 to 49 staff)
Micro business (up to 9 staff)
Professional body
Trade union or staff association
Other (please describe)

Question 1: How can we ensure that every Apprenticeship delivers substantial new skills?

City & Guilds welcomes the proposals as set out in this response. We have some concerns over the detail of the implementation and are happy to work with the Department to ensure real value is delivered to this vital area of the economy.

We agree with the distinctions made in the Review between programmes of work preparation, as the new Traineeships will deliver, reformed apprenticeships as proposed and recognition of existing skills in the work place.

City & Guilds strongly supports the view that an apprenticeship should involve substantial skill gain over a sustained period. However, it must be recognized that not everyone will arrive with the same starting point. Additionally, we have heard from employers who work in seasonal industries, such as travel, that the methodology needs to accommodate seasonal breaks. A vital component of a successful apprenticeship is the opportunity to develop experience as well as the skills needed for a role.

Some caution is advised when comparing England with European models of apprenticeships. A recent research visit by City & Guilds to Germany found considerable differences in the socio-political background which makes any wholesale adoption problematic. Continental Europe operates a much more collaborative system with employers, unions and the state working closely coordinated by local Chambers of Commerce- membership of which is compulsory for all businesses. In addition there is a formal link between having a relevant qualification and getting a job which is not replicated in our volunteerist system.

As it is unlikely such a system could be introduced here we should look to take the best of what will work here. Discussions with our networks of employers suggest there is an appetite for coming together in a collaborative way to establish standards but that any new system must be able to recognise the differences between sectors in terms of what employers require for a role and that the definitions of what constitutes a sector will have its own challenges with significant differences between particular segments of, for example, the food and drink industry.

In practice, Apprenticeships have become the default framework for initial, work-based vocational education and training, because it has become the only funding available for such
training. However, the tight limits on funding have meant that expanding participation has sometimes encouraged those who provide the training to focus on the shortest, lowest cost route to achievement, and to recruit those requiring the minimum amount of such training. The goal must be to get the right people on the right programme. The introduction of funding for 16-19 programmes of study should reduce the numbers of students undertaking Apprenticeships who are insufficiently prepared to do so, enabling providers to place students on the right programmes of training such as Traineeships or City and Guilds Level 2 TechBac®.

The question of what is the appropriate level for the apprenticeship should be left to the employers in a sector to decide. Some industry roles are at Level 2, others are higher. We fully support moves to create more advanced and higher level apprenticeships but these must be because they are needed by an industry. One of the strengths of a market based system is that it encourages innovation, but it also encourages providers to respond to the funding signals in ways that suit their business goals, not necessarily policy goals.

**Question 2: How should we invite and enable employers to come together to design new standards for Apprenticeships?**

The Sector Skills Councils, the fourth iteration of a government led process, were conceived as being, employer-led bodies that would set standards based on employer needs. That they are not seen as doing this, and needing to be replaced by employers reflects two things:

Firstly, centrally imposed models cannot meet the needs of an economy as diverse as ours and Government should work though those such as City & Guilds who have been working with employers and apprenticeships schemes since the nineteenth century as well as organisations that employers have chosen to set up themselves, such as Trade Associations. Secondly, there are many employers with differing views. The attempt to represent all employers in a sector within a rigid framework cannot succeed and there must be flexibilities in any new approach. City & Guilds has a number of Industry Boards which we set up precisely to achieve this, they bring together a range on employers and experts to advise us on qualification and training needs.

City & Guilds has the knowledge and expertise built up over many years to work together with employers and professional bodies to bring together the best to support the creation of appropriate qualification. There are many good employers but not all have the same high standards or expectations and relying on one element carries risk if that element does not deliver.

The ability to convert employer expectations into precise specifications which can be used to create the qualifications needed to meet those expectations is a highly skilled process. We would argue that standards, approaches to teaching and learning and assessment need to be designed in tandem, and that although employers may be the guardians of standards they are not always the best people to be designing valid and reliable assessments of competence, this is the purpose of awarding bodies, so partnerships between employer groups and awarding bodies which help to achieve this should be encouraged. We need to strike the right balance between current best practice with future needs within a sector.

Even within a defined sector some employers will be working to more advanced processes and procedures than others. A decision will be needed on whether to base standards on leading edge companies. We believe that there is a need for elitism in the process if we are to achieve elite outcomes. At the same time a balance will have to be struck between the desire of leading employers to collaborate in the wider interest against their natural competitiveness with each
other. Our discussions with employers tell us there is appetite for collaboration, up to a point, and there will be sensitivities that only an approach involving organisations such as City & Guilds can resolve.

We anticipate that the first Industrial Partnerships funded through Employer Ownership will identify those groups of employers who have the ability to shape their future learning strategies in a way that is innovative, yet inclusive and that organisations like City and Guilds would seek to work with these partnerships with these IPs to create Apprenticeship qualifications which are freed from the current restrictions imposed by the SSCs and truly reflect the needs of employers. However, not all sectors will be able to rise to this challenge, this will be particularly critical in sectors where SMEs and micro businesses make up the majority of employment and a partnership model where we can bring groups together would be the best vehicle for this.

Defining industry sectors is always difficult, made more complex by the fact that a substantial proportion of job roles are not industry specific (leadership and management, administration, customer service, sales and marketing) - these job roles account for more than a third of occupations and apprenticeships. Any system developed to involve employers must be designed to accommodate that fact, and not treat them as an afterthought (as has tended to be the case in the past).

To start a sensible strategy would recognise that the number of apprenticeship frameworks needs to be kept to a manageable number, and therefore could start by establishing a minimum number of employees in an occupation as a criterion for developing a specific framework. Any highly specialist, low volume occupations would need to demonstrate that they cannot be treated as a variant (using the core + option model suggested in the response) on more common occupations, based on a minimum of (say) 40% of any qualification being its core.

To protect the brand of ‘apprenticeships’, other options must be available where the needs of the sector do not meet new apprenticeship requirements.

**Question 3: What are your views on the proposed criteria for Apprenticeship standards as set out in Section 2 of this document?**

We believe that these criteria provide a good starting point but may not be transformational. Since its revitalisation in the early 1990s, the apprenticeship system has tried to aspire to being best in class, internationally. Unfortunately, the desire for a centrally designed system has meant that standards have been compromised in some areas and structures put in place that focus on 'the minimum necessary' and not working towards 'the maximum achievable'. It is noticeable that those Apprenticeships which are over-subscribed (in aerospace, telecommunications, etc) are those that are in industries that cannot compromise on standards if they are to succeed internationally.

The current system, in too many cases, conflates ‘competent’ with ‘adequate’. A shift in focus from accumulation of ‘evidence’ over time to an end assessment which is graded could help to mitigate against this and allow recognition of excellence. However, the point has been made very forcibly to us from the Health Professional and Care sector that it is essential that apprentices are rigorously assessed throughout the programme as they need to demonstrate specific competence early on before they can work effectively with those who are unwell, or for example, a resident in a care home. They are far less supportive of a system based on ‘final assessment’.
Q4: Should there be only one standard per Apprentice occupation/job role?

Insofar as that is possible, yes, though it will be essential to select appropriate sub sectors where this is crucial to the industry. Multiple standards will confuse all parties, and will encourage a drive towards the lowest standards. Our comments in answer to question 2 also apply here. In today’s economy there are fewer job roles which are generic, outside the traditional craft sectors and therefore scope must be available for a degree of customization by each employer. Once again there is a balance to be struck and the simplicity of a ‘single role’ approach depends on getting the right level of description and a deep understanding of the industry. This will only be effective if careful consideration is paid as to how narrowly any job role or occupation is defined. In large firms a role maybe more specific whereas in a smaller firm a job role may need to be broader.

Yes [X]  No [ ]  Don't know [ ]

Please explain your response:
Question 5: Should there be only one qualification per standard?

Yes ☐ No ✗ Don’t know ☐

Please explain your response:

The Government's response to the Review is not precise about what it means by 'one qualification'. If it means moving from the combination of technical certificate and competence assessment to a single qualification (former NVQ) then we would agree. If it means incorporating the functional skills assessment then this would present some problems, not least where apprentices already have qualifications in English and Maths. We have therefore assumed it means the former.

We would not support an approach where there was only one qualification available per standard if that meant there was just one awarding body able to offer it. Employers we have consulted are strongly opposed to this idea. They were very supportive and value the idea of inputting to the development a high level standard but would then want to be free to work with others including awarding bodies to create the qualification offer that meets their need. A single awarding body approach may limit innovation and efficiency, pushing up costs and discouraging best practice. The experience of the last few years has been that the introduction of the QCF led to established awarding bodies contributing their expertise to the design and development of new, generic qualifications that have then been available for others, without their level of expertise, to make free use of, competing on lower costs (because they have had to make no investment in the development process) and quality (having no real expertise in the domains). We need to return to a system where those with the expertise and employer involvement work for the mutual benefit of the apprentices and the employers operating in a sector.

A renewed system needs to tackle this, and it would be sensible for employer-led development to involve a selected group of awarding bodies that have the capability to work with them in the development of both standards and qualifications and in return have exclusivity in offering them. This will maximise the benefits in the development phase, and ensure competition in provision of the qualifications, without compromising standards. This does not have to be centrally orchestrated. We already work closely with hundreds of employers, involve employers on our advisory committees and industry boards and would utilise these mechanisms, as we do now, to bring parties together to support employers to set out their needs and aspirations for apprenticeship frameworks in their industry.

Question 6: How should we manage the transition from the current system of Apprenticeship frameworks to a new system of employer-designed Apprenticeship standards and qualifications?

The proposals are a significant change from what is currently in place and the transition must be managed with care and in a phased manner. The model of:

Develop -> Pilot -> Refine -> Adopt

would be the best approach.

The introduction of the SSCs, the development of the QCF and the creation of the current
apprenticeship frameworks provides clear evidence of how not to do it - too much, too quickly puts available resources under enormous pressure and inhibits best practice. There is a need for a phased process, based on the relative maturity of existing frameworks - start with older ones - and the skills shortages in the sector - use the revised apprenticeship frameworks to solve the most acute skilled labour supply problems.

**Question 7: How can we make sure that the new standards stay relevant to employers, and are not compromised over time?**

There is a tension between ensuring the quality of delivery and ensuring currency and relevance. The present system, which tends to embed standards with high degrees of specificity makes it hard to build in incremental advances in knowledge and skills. By adopting a more holistic approach to specifying frameworks, it is possible to accommodate changes in the standards, as required by employers over time without the need for re-accreditation of qualifications, or a fundamental change in assessments. To achieve a tight-loose model, one that relies on broader statements of outcomes operationalised by awarding bodies offering qualifications that are designed and quality assured to world class standards. Qualifications will only need revising in longer cycles (four or five year periods) but with more frequent updating of guidance on their implementation in the light of emerging technologies and knowledge.

**Question 8: How can we ensure that employers are better engaged with the development and oversight of the assessment in Apprenticeships?**

The points here are similar to those expressed in our response to Question 2. With few exceptions, there are far too many employers in any one sector for all or even most to be involved. Engagement has to be with those who have a broad reach to ensure some breadth. However, it is important that those employers who are at the leading edge of technology application and skills utilisation are also involved. It should be a badge of honour for employers to be allowed to be part of the process, and their role should be defined explicitly as driving up standards in their sectors, not simply as being ‘typical’. This should be the challenge to employers and the awarding bodies, to seek out those at the leading edge in their sectors, to act to drive up standards across the sector. A point worth noting here is that it will be critical to engage with the ‘doing’ part of businesses as well as their HR or learning and development teams to get a full picture of the skills needs and talent development of the business, both current and future.

It should be noted that employers themselves rarely have direct expertise in assessment. This lies with the established awarding bodies where a considerable body of knowledge and experience backed by leading research can be deployed. Employers can bring great benefit by providing problems and scenarios to form the basis of assessments. This would maximise the benefits from the synergy available when employers work with awarding bodies, who can bring their expertise in assessment and quality assurance to the training needs of an employer.

**Question 9: How could employers best be involved in the practical...**
delivery of assessment?

It is worth looking at examples where this already takes place and seek to replicate, as far as is possible. In some countries this is done by the use of demonstration activities, organised at regular intervals in easily accessible locations for most students. This works best in those occupations that rely on more traditional craft skills - in engineering and building trades, hairdressing, etc. It is far less easy to apply this in those service sector roles that now account for the majority of apprenticeships - administration and customer service, accounting and management.

This does not mean it is impossible for employers to be involved, but assessment by any employer needs to be to the national or international standard demanded, and this could be difficult if they themselves are not properly qualified and operating at those same standards. This is the tension at the heart of the proposals - engaging employers and raising standards, when not all employers operate at a sufficiently high standard themselves. Involvement can still be achieved by building in real problems or challenges from those business environments to assessments created by awarding bodies. We hold the legal responsibility for our assessment and so much also be satisfied about its effectiveness and vigour.

Several approaches would be worth exploring. One to encourage more employers to become ‘Assessors’ themselves, contracted to an awarding body to assess students in the end practical assessment. This does raise the question of how productive it is for employers to be directly involved. It order to maintain impartiality it would be necessary for any employer/assessor to come from another firm within the sector, as well as practical logistics this also raises concerns over commercial sensitivity. By de-coupling this assessment from providers and placing it in the hands of trained assessors with real experience in the industry then we could help to ensure the validity of those assessments. The expertise within Union Learn could be a potential asset here. Another option would be to include a final board assessment, with employers and assessors interviewing apprentices may to introduce some objectivity to assessment, and achieve the objective of holistic assessment in those areas where demonstration of skills is not feasible.

Question 10: How can the independence and consistency of assessment in Apprenticeships be further improved?

As has been suggested, one of the developments of recent years, with the advent of NVQs and then accelerated by the QCF, has been the proliferation of awarding organisations, both new ones and existing specialists diversifying into other areas. The competitive environment that this has created has put downward pressure on costs and quality. Some competition is good; it keeps costs under control and encourages innovation, but there needs to be some degree of pressure on quality in the other direction, and this is something that those responsible for standards should treat as a critical part of their role, working with those awarding organisations dedicated to raising standards, to ensure that their sectors are operating at world class levels.

The recent report City and Guilds produced for Ofqual on work based assessment demonstrated that vocational assessment can, when done well, produce results as reliable as any form of assessment. We also highlighted the inconsistent approach to assessment in work based observational assessment that can occur when those responsible for the quality assurance are operating below the levels we demand. By providing a clear framework of practical end assessments, performance statements which relate to different levels of
Our research into effective vocational pedagogy, *How to teach vocational education: A theory of vocational pedagogy*, Dec 2012, found that the evidence is clear that vocational education needs to be taught in the context of practical problem-solving, and that high-quality vocational education almost always involves a blend of methods. The best vocational education learning is broadly hands-on, practical, experiential, real-world as well as, and often at the same time as, something which involves feedback, questioning, application and reflection and, when required, theoretical models and explanations.

The relevant concepts to demonstrate quality in vocational assessment are complex and not very well defined. Hence, they are not clearly understood – even by professionals in the field, and often quite unhelpful ‘folk wisdom’ substitutes for genuine understanding.

We usually say that the thing we are assessing is ‘competence’. It is often clearer what this is not, rather than what it is. The way that English VET practitioners talk about competence is quite different from how French and German experts talk about analogous concepts, for example.

The general concept that usually allows us to determine whether an assessment is producing high enough quality measurement is ‘validity’. An important sub-set of validity is reliability. Notions like independence and consistency would be subsumed as part of either reliability and/or validity.

The complexities in this area suggest that there should not be a rush to judgement. It is important that experts in the field collaborate to update understandings of competence, validity and reliability as they apply to new apprenticeship qualifications. City & Guilds has published several reports into the reliability and validity of vocational qualifications. Such contributions could be a starting point for an updating of our understanding of these key concepts in the context of English apprenticeship qualifications.

The lack of ‘ownership’ of standards by awarding bodies resulting from the SASE requirement to use the QCF for apprenticeships has resulted in more emphasis being placed on certification than learning and assessment practice, this is something we hope would be addressed by the involvement of relevant awarding bodies in the design of qualifications and assessments.

**Question 11: How should we implement end point assessment for Apprenticeships?**
Our first comment here is that the Government must be aware of the potential significant cost in moving to end point assessment. A model like that used at World Skills or the Skills Show would indeed be a challenging and meaningful assessment and would lend itself both to the objective of providing a holistic determination of the level of skills and knowledge the apprentice had developed and to measurable and comparable grading.

However to provide this on a national scale across the full range of occupations and sectors poses a significant delivery challenge. We also need to reflect, as noted in our recent Vocational Pedagogy report, that just as different approaches to learning are appropriate to different vocational sectors, it follows that so are assessments. City & Guilds already has a network of fully qualified vocational assessors who perform this role in the land based sector and we would develop similar networks if this model is agreed.

Currently apprentices achieve when then have completed all the components of the framework they are registered on. The logistics of offering a range of practical assessment both within the work place and in simulated environments (as is common and effective in medical training supervised by ‘independent’ assessors should not be underestimated. That said it is highly desirable if we are trying to provide a holistic assessment of an individual’s ability to undertake a job – the ultimate test of an Apprenticeship.

The starting point would be to work with employers, potentially through one or more Industrial Partnerships to create a model which could be piloted and tested, and importantly costed, to ensure the end result is a valid, reliable, and cost effective way of assessing these skills. Whilst cost should not drive the model an over-burdensome assessment will limit the appeal of Apprenticeships to employers and learners.

Apprenticeships cover a broad range of occupations and it is highly unlikely that a single assessment model will fit all apprenticeships. It will perhaps be better if a series of fairly general principles can be enunciated. These are already implicit in the government’s proposals (eg increasing independent judgement, reducing the volume of assessment, involving employers in a meaningful way, etc.). The experience of assessment in medical disciplines offers a model for how to develop standardised methods for assessing practical occupational skills. A summary of this work is given in City & Guilds’ report on workplace-based observational assessment – soon to be published on the Ofqual website.

**Question 12: How should we implement grading for Apprenticeship qualifications?**

Vocational qualifications have been built on the principle of competence, I am either competent to undertake a task or not. In reality we make decisions as consumers when we get a tradesman as the ‘quality’ of the work which is done. For those reasons we need to assume that employers also want to know whether the person they are taking on is merely competent to perform a level of defined job outcomes or can demonstrate a level of skill over and above that simply required for the job. What makes a ‘good’ or ‘excellent’ hairdresser may be hard to define but it is possible to do so, it may rely on the assessment of skills that go beyond mastery of their craft and about ‘how’ I do a job, my attention to detail, may ability to listen and interpret the needs of the customer, etc. It is possible to translate these skills into a set of
performance statements which can be used to judge performance at different levels. It would be naive to think that employers are capable of translating their expectations of skilled employees into objective standards without the help of real technical specialists in the area of standards setting, most of whom lie in the established awarding organisations.

We return again to the expertise needed for a system change such as proposed in the Review. When vocational education and training systems were initially created, discussions about vocational pedagogy were likely to be derived from the principles of general education. Even today, there is a sense in which vocational pedagogy sits in a no man’s land between what is taught, in colleges and by training providers, and what is needed in the workplace. And too often employers complain that the content taught does not connect closely enough with the requirements of a particular occupation.

Vocational education faces two major challenges. Firstly, the dual worlds of educational institution and workplace require two sets of expertise – teachers with current experience of the workplace and workers who can teach. And many vocational learners have diverse needs which may be challenging. Of whatever age, vocational learners may not have had fulfilling experiences in their general education to date leaving their motivation impaired. Alternatively they may be so hungry for paid employment in the real world that they are impatient to leave formal education. Any approach to vocational pedagogy will need to respond to these additional challenges.

We would not recommend an approach to grading that mirrors that commonly used in general qualifications. Any grading system has to have at its heart a minimum standard which is required to ‘pass’ and if it is to be rigorous it has to allow for the possibility that people will fail or take a significant amount of time to achieve the standard. We would hope that the introduction of pre-Apprenticeship provision via Traineeships would ensure only students with the appropriate aptitudes and attitudes would embark on an Apprenticeship, reducing drop-out and failure rates. At the other end of the spectrum a graded Apprenticeship would enable those individuals who have demonstrated excellence to be recognised by employers, to be rewarded and for their talent to be identified and managed by the business. We would recommend using a grading system which established criteria for Fail, Pass, Merit and Distinction.

**Question 13: What are the specific obstacles to all Apprentices achieving level 2 English and maths as part of their Apprenticeship, and how could these be overcome?**

This question assumes that most do not already have qualifications at this level. In some Apprenticeships it is common for entrants to have A-C in English and Maths on entry.

The current academic route to Maths and English qualifications within the school system does not motivate or engage some students, whilst this remains the default qualification for schools then we will continue to have students at 16 who do not have these skills at what is considered to be a functional level.

We need to ensure that we have appropriate initial and diagnostic assessments of these skills for all potential Apprentices. For those with the greatest skills gaps Traineeships offer the
opportunity for these skills to be addressed prior to the start of an Apprenticeship. Employers often struggle with the functional skills requirements which are inherent in Apprenticeships because the best teaching of these skills is done by specialists. There are arguments to suggest than the all apprentices should have access to off the job courses in Maths and English to build up these skills, either prior to embarking on an Apprenticeship or in the early weeks of doing so, but that this provision should be targeted at addressing gaps rather than sheep dipping learners in a one size fits all programme which is driven by funding.

With a strong base of skills on which to build it would then be possible to integrate appropriate vocational Maths and English, required for the job role, into the standards, and assess these skills in context.

The most critical issue here is to allow and indeed encourage alternatives to GCSEs. New maths and English qualifications, such as those developed by City & Guilds in response to earlier BIS initiatives, offer an applied approach that develops the skills learners need in the world of work and life. There is a large body of research showing that employers find the skills of even those with good grades at GCSE do not always meet their needs. Functional Skills qualifications too have their limitations, especially in the assessment approach required. We worked with experts in the field to design our new provision to ensure they would deliver the correct balance of rigour and practicality. We are currently developing the level 3 versions and see these as particularly helpful to those undertaking Higher level apprenticeships.

One note of caution, a careful balance is required between the direct needs of an employer for what is deemed the maths/English skills needed within a job role and the levels needed for the apprentice to enable progression. Some roles may not require very high levels of maths; see our response to Q14 below.

**Question 14: How would a requirement to have all Apprentices achieve level 2 in English and maths impact on employers, providers and potential learners? What are the risks and potential solutions?**

Although the government has defined ‘functional’ levels of Maths and English as Level 2 in reality there are a number of jobs for which specific aspect of the functional skills standards are not required at this level. For a skilled Apprentice, able to undertake the tasks required in their specific occupation, to the highest standards, and yet to be denied success in their Apprenticeship due to their failure to pass a functional skills test at level 2, is something that many young people and employers alike fail to understand.

If we get the standards right for Apprenticeships then we will ensure those Maths and English skills which are essential to competent performance of a job role are developed and assessed in context. The achievement of discrete qualifications in Maths and English then becomes desirable but not a hurdle to Apprenticeship achievement.

It seems reasonable to expect that for advanced level apprenticeship and above, a candidate should already have achieved their level 2 maths and English but this must be driven by the employers, not imposed by directive.
**Question 15: What further steps, by government or others, could encourage greater diversity and innovation in training delivery to help Apprentices reach the standards that employers have set?**

The challenge facing vocational education and training providers in recent years has been to drive down costs. This can encourage innovation, but the level of uncertainty in the system acts to limit any innovation that may present risk (and most innovation is risky).

Unlike the school and HE sectors, the VET system has gone through a remarkable degree of radical change over the last two decades, and has been willing to embrace innovation, sometimes with the unintended consequence of disadvantaging learners in the process.

Ignoring structural changes to the sector, the qualification system has been through several major transformations, unlike general qualifications (GCSEs and GCEs), which are comparatively very stable. This constant tinkering with the qualification system has done little to breed confidence amongst employers or ensure some certainty within which innovative delivery methodologies can be developed.

We need to do more to exemplify and disseminate good practice and to share information on what good looks like. There has been so much focus on getting people on Apprenticeships and driving up achievement rates that we forget to look at what happens in between. City and Guilds hopes that its work on vocational pedagogy and the establishment of an FE Guild will provide a mechanism through which we can start to understand what good delivery looks like. The challenge will be in a system which is going to potentially see employers as the ‘funders’ of Apprenticeships then we may see less involvement from providers as employers decide to outsource less of their delivery to FE. As stated some of the best regarded Apprenticeship programmes are run by big Employer names, capturing the essence of what makes these special will be important, however the experience of an Apprentice in food manufacturing in a large organisation may be very different to that of an Apprentice in a craft bakery.

**Question 16: What approach would work best to ensure Apprentices benefit from time to train and reflect away from their day to day workplace?**

The traditional 'day release' model of teaching and learning is but one way of delivering an apprenticeship. The advent of individualised online learning, coaching and mentoring, and workplace assessment make the idea of 'off the job training' little better than an abstract concept. What learners require is a structured learning programme, which includes opportunities for learning new concepts, practices and skills, planned learning transfer, application, reflection and further learning. The pedagogical model will reflect the learning domain, the needs of the learner and employer, and the capabilities of the learning provider.

Attempts to impose specific rules of delivery are the best way to restrict innovation and discourage learners and employers alike. SMEs in particular struggle with releasing apprentices for the training they need.

Nevertheless there is a strong case for all apprentices to experience time away from the workplace, preferably with others in similar positions. The challenge is to find ways of
facilitating and encouraging this without unnecessary layers of prescription.

The shift in emphasis from providers driving Apprenticeship take-up and delivery to employers will necessitate a different approach by FE and Training providers, one based on a menu of services which could be made available to the employer to purchase. This menu should include a range of training interventions that can add value to the Apprentice’s learning experience, including the facilitation of networks and groups that meet both physically and virtually. We don’t believe this can be enforced but it can be encouraged and those interventions which prove the most valuable will be taken up.

**Question 17: Should off-site learning be made mandatory?**

Yes ☑ No ☐ Don’t know ☐

See response to Q 16

**Please explain your response:**
Question 18: How can the process for approving training providers be improved, to help employers find high quality, relevant training?

The Skills Funding Agency currently approves providers who access public funding to deliver training. The approval process however process focused rather than quality focused. Ofsted is responsible for judging the quality of delivery but only after approval.

City & Guilds approach when approving centres to offer our qualifications takes a two stage approach, first of all considering the overall centre itself (the process side) and then a further stage where we review the capabilities of the training staff, their qualifications and industry experience and the levels of equipment and support to deliver specific qualifications (the quality side).

The present Ofsted regime has placed teaching and learning at its core, and this is acting to drive up quality across the sector, and putting those organisations that can’t meet the standard at risk. This level of rigorous inspection should help to remove poor provision and any additional measures put in place should support Ofsted’s strategy.

However Ofsted reports offer limited real time information on the quality of provision, some of them being over 2 years old. They often cover judgements based on a range of training interventions and it can be hard to unpick this at programme level and for particular vocational area. If I am looking to source a provider who can help me delivery of a ‘construction’ apprenticeship I want access to information about what experience that provider has of delivery of that Apprenticeship (numbers), what are their success rates and what do other employers think of their provision. This information should be made available through a body such as the National Apprenticeship Service.

Question 19: Do you believe that a kitemarking scheme for your sector or profession would add value and be supported?

Yes □ No X Don’t know □

Please explain your response:

We would be wary of introducing another layer of quality assurance on top of our own approval process for providers and the Ofsted inspection regime. Some industries may wish to include additional checks for their provision and in those cases we could work with them to ensure their specific requirements were incorporated into our centre approval processes. This would be a far more efficient and dynamic model to adopt. City & Guilds already approves providers to deliver our qualifications when they have been through our rigorous approval process (as in Q18 above). Our close links with industry enable us to be familiar with the standards required.

Question 20: What more can government do to facilitate effective third party/external use of its data to better inform individuals and employers
about Apprenticeships?

There are different aspects to this question. At one level there is the economic data about the return on investment to employers from apprentices and the wage returns available to those who successfully complete an apprenticeship in different occupations.

There is the performance data of different colleges and training providers in terms of their success rates and next step destinations of their learners and then there is the data relating to local labour markets and demand trends and current vacancies for apprentices in different occupations. In addition, learner and employer satisfaction surveys provide a critical feedback route.

All of this data is available and should be made accessible for multiple audiences, including employers. We should be asking employers what information they would make decisions on and then serving up that information in a format that makes it easy for them to makes decisions on it.

**Question 21: What approaches are effective to inform young people and their parents about the opportunities provided by an Apprenticeship?**

Young people choose their further education and training based on personal interest and availability of options and often do not have access to local labour market information, with the former being of far greater importance. Our report: *Ways into Work: Views of children and young people on education and employment*, set out interesting findings from a unique perspective – the voice of young people themselves. The survey engaged with over 3,000 young people aged 7-18 years and highlighted key themes for the sector to address. One third of respondents said they had not received any careers guidance. Those that had received careers advice and guidance, said they had received this from teachers in their schools. But this was not their preferred mechanism for receiving advice and guidance and the majority put a higher value on the advice received from employers and family members. Well planned work experience or placements can be inspiring and worthwhile for both young people and employers. If poorly organised, it can be disillusioning. Only 26% of the 16-18 group surveyed had actually visited an employer recently, and yet all age groups (7-18 years) agreed that visits to employers were the most useful source of information.

The biggest barrier to Apprenticeship take-up is careers advice in schools. Now this has been devolved to them there is very little incentive to promote Apprenticeship opportunities as the next step at 16, or 18 since schools have a greater incentive to keep students in their own sixth-form provision, where it exists.

The answer lies with apprenticeship providers to sell their opportunities as well as possible, at a local level (which is where individuals make their decisions). Government data, at national level is as irrelevant to a school-leaver in London as it is in Somerset. Their concerns are more about bus routes and timetables! There is a concern if providers are no longer in receipt of funding their incentives to promote apprenticeships may diminish. In a model where Employers are left to drive Apprenticeships then there is a risk that there will be even less by way of promotion, unless this is undertaken by Government or industry bodies.

All young people need to have the right to spend up to four weeks on a pre-apprenticeship placement during years 10 and 11, publicly funded and with financial support for those pupils.
having to travel long distances to take part in their preferred option. This does not have to occur in term time - vocational education and training providers are not constrained by the school timetable.

**Question 22: How can we support employers to engage with learners of all ages to provide information about Apprenticeship opportunities?**

The barrier lies in the schools, and potentially also in colleges if the funding shifts to employers. A requirement for them to show to Ofsted that they are actively promoting Apprenticeships would have a major impact and would cost nothing. There is a real need for schools and colleges to engage with local employers and ensure their learners are aware of the skills shortages and likely vacancies their areas. As a member of Business in the Community we would suggest their approach is an excellent way to broker meetings between employers and schools.

**Question 23: Do you consider that the proposals set out in this document would have a positive or negative impact on any group, including those with protected characteristics? Please provide any comments or evidence you have for your answer and set out which aspects of the reforms will impact and how these impacts might be managed.**

It is true to say that for some individuals a model of building up competence over time is a more attractive and comfortable route to demonstrating competence than the proposed model of end assessments. A model which allows students multiple attempts to demonstrate their competence in a range of situations can play to a learner’s strengths. Further more, as we stated earlier there must be a process to monitor ongoing development throughout the apprenticeship. This is critical for learner support, especially where they may be lacking in confidence or with particular needs. This mix of formative and summative stage assessment will allow progress checking and should ensure that when the time comes for the end assessment the apprentice is fully prepared.

However, if the end assessments are appropriately designed then this should prevent no additional barriers for students. If the end tasks require a learner to demonstrate they have the skills to conduct a particular set of tasks, if they are competent in all aspects of the tasks required to perform in a job role they should be successful in the assessment.

In addition requiring achievement of Level 2 maths and English may be a particular barrier to some candidates with protected characteristics who may well be performing at the required standard in terms of their skills and knowledge in their role.
**Question 24:** Do you have any further comments on the issues in this consultation?

We take this opportunity to make a number of points which do not sit naturally as response to the questions above.

1. City & Guilds finds it surprising that there are no questions relating to Section 6 of the Government Response: Giving employers the purchasing power and incentives to drive quality and value.

The response states “The employer is the customer: Positioning the employer as the customer increases providers’ incentives to respond to businesses’ needs. This means employers should be the main purchasers of training from training providers.”

There is a risk of encouraging a ‘race to the bottom’ if training providers are encouraged to compete on price grounds for an employer’s business.

Furthermore, receipt of public funds implies and indeed requires audit and inspection. Large firms, perhaps operating at national or regional level may have the resource to support such a regime but it could prove a major disincentive for SMEs to become involved.

2. Apprenticeships as described in the review and the response will be more challenging and perhaps may no longer exist in some roles as they do now, if the amount of training required does not meet the test of ‘sustained and substantial’. There is also the risk of devaluing the achievements of those on current apprenticeships if these are viewed as not meeting the new standards.

3. In the current economic climate, the actual number of new jobs and roles which meet the required standards may well be considerably smaller than the current levels of apprenticeship starts.

4. We have found and feedback from the employers we work with confirms, that the current SASE can be a block on innovation. Nor has it achieved its aim of ensuring quality, apprenticeships criticised as being of poor quality in Ofsted reports have been SASE compliant. Quality can not be imposed by State dictat but by employers working collaboratively with those such as City & Guilds who bring a wealth of expertise and experience. The most consistent feedback we have received from employers in informing our response to this consultation is that ‘one size does not fit all’. If the Review is to bring a lasting legacy of high quality apprenticeships, valued by employers learners and the public then Sectors must be able to define what is right for them and their industries.
Annex B: Terms of reference for Richard Review

Summary

1. The government wishes to commission an independent review of Apprenticeships in England, to ensure that in the future the programme is meeting the needs of the changing economy, consistently delivers the professionally recognised qualifications and skills which employers and learners need, and is maximising the impact of government investment.

Detail

2. To be led by a senior, independent business figure, the review should take critical look at apprenticeships and look to identify a set of principles and priorities for the optimal content of future Apprenticeships, to ensure that every Apprenticeship delivers new high quality training and professionally recognised qualifications.

3. The review should identify the best of current practice and recommend ways to extend this.

4. Key questions to be considered include:

   o What should the core components of an Apprenticeship be - to meet the needs of employers (large and small), individuals, and the wider economy?
   o Who should Apprenticeships be for – which types of learners and employers can benefit most from apprenticeships?
   o Are there elements of apprenticeships which should be simplified or stripped back?
   o Are the qualifications which are undertaken as part of an Apprenticeship sufficiently rigorous, and recognised and valued by employers?
   o How should delivery arrangements adequately ensure all that Apprenticeships provide significant new learning and acquisition of new skills, rather than the accreditation of existing ones?
   o Are there opportunities to improve the impact and value for money of public investment in apprenticeships?

Timing

5. The review should report in autumn 2012.