

Institute for Apprenticeships and Technical Education consultation on a simplified EQA framework

Response of the Association of School and College Leaders

A. Introduction

The Association of School and College Leaders (ASCL) represents nearly 20,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary and further education and skills phases. This places the association in a strong position to consider the issue of what is important for apprenticeships from the viewpoint of the leaders of schools and colleges of all types.

ASCL welcomes the opportunity to contribute to this IfATE consultation on the EQA framework.

We agree that quality is central to the reform of apprenticeships and we acknowledge that every apprentice who completes their apprenticeship standard must undertake a holistic, independent end point assessment (EPA) to confirm they have achieved occupational competence. We also acknowledge that the assessment should be delivered by an independent end point assessment organisation (EPAO) which is selected by the employer. This external quality assessment (EQA) ensures that quality, relevance and reliability of assessment is achieved, wherever and whenever assessment is undertaken and that in meeting the needs of employers, the EPA, achieves consistency, validity and reliability of delivery, process and outcomes as specified in the apprenticeship standard and assessment plan.

We acknowledge that the above is important to ensure that employers are confident that anyone who completes an apprenticeship is competent in the occupation for which they have been trained. The EQA experience for apprenticeships should be of high quality, be fair and be of the same standard whichever EPAO conducts the assessment.

We understand that three levels of quality assurance exist within the EPA system; that undertaken by EPAOs, that which assures compliance with the assessment plan and meets the needs of employers and apprentices and that which is undertaken by the Institute to assure the quality of oversight.

We also understand that only two of those levels, that undertaken by EPAOs and the Institute are being consulted upon in this consultation in this instance. We acknowledge that the EPAOs activity will be monitored by Ofqual and OfS. We also acknowledge that the Institute's activity is governed through its statutory responsibility and through the EQA framework, which ensures that the EPA is consistently of high quality across all occupational routes, apprenticeship standards and EPAOs.

We understand that the Institute will support Ofqual and OfS and other stakeholders to make recommendations to the delivery of EQA through the EQA framework through the following

principles: relevance, reliable, positive, efficient and learning to achieve continuous improvement.

ASCL's responses to the consultation questions are set out below.

Section 1: Simplifying the EQA system

The proposal by IfATE that all external quality assurance should be delivered by either Ofqual or OfS is acceptable. The current system where Trailblazers can choose from Ofqual, the Institute (which subcontracts its role to an awarding organisation) a professional body or employers themselves raises issues of potential inconsistency and lower quality. Under current arrangements, we understand that 20 organisations are approved by the Institute to deliver EQA which makes it unwieldy.

1a. Does the proposed system impact on your organisation ?

YES on our member colleges, who are school and college leaders impacted by an already complex system.

1b. If yes, please exemplify any benefits or challenges you foresee in the proposal for your organisation

The benefits of the proposed system are that the current system is complex and not as transparent as our members would like. The move to fewer organisations should, theoretically, be more transparent and less complex.

1c. How do you propose the institute should manage the impact of the proposal on your organisation?

Ensure that the new system is transparent and effective and has a review period to take on board any emerging future unforeseen complexities. This will help our members.

1d. If no, please tell us more about your interest in EQA, exemplify any benefits or challenges you foresee in the proposal and your proposal to manage the impact.

N/A

1e. Do you have any comments about the potential impact the proposals outlined in this consultation may have on individuals with a protected characteristic under the Equality Act 2010? Please explain your reasoning.

A large number of young people and adults with protected characteristics are recruited from and via colleges to local apprenticeships and subsequently trained by colleges. It is important that the Institute is aware of the impact of any changes in the EQA on colleges so that our members can try to mitigate the impact of such changes on learners with protected characteristics.

The changes brought about by the current Coronavirus social distancing measures impact on apprentices and slow down the rate of their achievement and progress into work.

We would also encourage IfATE to consider the fact that prior learning accreditation, where relevant, will have been affected by Coronavirus, impacting the students' ability to progress from the point of view of timely completion of the apprenticeship training programme.

Section 2: Role of professional and employer led bodies

Restricting EQA to regulators such as Ofqual and OfS seems sensible. The proposed role of OfS for degree apprenticeships also makes sense. This should lead to more consistency than the current system where the Trailblazer chooses the integrated degree apprenticeship model. Employers should be able to specify a mandatory degree in accordance with IfATE's mandatory qualification rules. This will also enable more opportunities to share good practice and facilitate fairer quality judgements.

We agree that Ofqual having the EQA role for level 2 and 3 apprenticeships seems sensible.

2a. Do you agree with the list of organisation types that could be included in the Institutes Register of Professional and Employer-led bodies?

YES, although this may still become a long list of organisations which may in turn lead to inconsistency in EQA outcomes.

2b. Do you agree with the Institutes proposed criteria for accessing the register of professional bodies/employer-led organisations?

YES, if processes and delivery are checked, as proposed, through the monitoring process.

2c. Does this approach effectively and sufficiently utilise the expertise of professional bodies to assure professional competence?

YES, if professional and employer-led bodies have input into the process, as proposed.

2d. Do you have any suggestions for how this approach could be improved?

YES.

Ensure the Institute works very closely with all relevant organisations to support quality and consistency in EQA processes.

We also ask that any concerns or complaints are published where possible, to ensure transparency and better understanding of the wider needs of all relevant organisations.

Section 3: Proposed transition arrangements

We suggest that apprentices may have issues of concern about the proposed changes due to different organisations being involved. Higher apprenticeships and non-integrated degree apprenticeships may raise issues of concern during the transition stage.

All such issues must be made aware to and supported by employers.

3a. Are there aspects of the transition arrangements that could be improved?

YES.

Communication of the changes to all key stakeholders will be very important, including organisations such as Ofsted and ESFA, to minimise reputational comments if inspections are undertaken or minimum standards meetings held during the transition phase.

3b. If yes, please provide more detail.

Please see above. It is clear that providers and apprentices know little of the proposed changes. It is important that once finalised, the changes are clearly communicated to all concerned.

3c. (for EPAOS)

3d. (for EPAOs)

3e. Do you think there are any further opportunities to simplify or optimise the system that have not been covered in the previous questions? if so, what?

It is important that the processes used by Ofqual and OfS are similar, if not the same so they are properly understood by all key stakeholders.

The most recent Ofsted annual report states that over three quarters of colleges have good or better quality and this is improving. In addition, achievement and success rates, although variable year on year, are also improving. This shows that college leaders are committed to improving the quality of learning and the learning environment, despite funding challenges.

The ability of colleges to help deliver initiatives such as changes to apprenticeship provision, the requirement for English and maths tuition and T Levels should not be compromised by the changes in the EQA system.

College leaders and their Boards are clearly committed to supporting the growth of apprenticeships and to improving the life chances of their apprentices by supporting them to achieve at least a pass grade in maths and English GCSEs, even though many of those learners have had to resit these qualifications several times since leaving school. The changes in these qualifications and the funding rules associated with their delivery and proposed IfATE funding and EQA changes may be challenging to our members within a background of less funding and more cost.

Conclusion

Our response, as mentioned above relies heavily on feedback from our members and others who support some of our most disadvantaged communities and yet also work with businesses and higher education to upskill the nation. ASCL largely agrees with the proposed EQA changes as long as they bring greater transparency and consistency to the quality assurance process.

We hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that we can.

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