

## **IfATE consultation on proposed updates to the mandatory qualifications criteria**

### **Response of the Association of School and College Leaders**

#### **A. Introduction**

1. The Association of School and College Leaders (ASCL) represents over 23,000 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 children and young people across primary, secondary, post-16 and specialist education. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to contribute to this consultation.

#### **B. Key points**

3. ASCL welcomes change to the assessment structure and the plan to ensure more apprentices complete their end point assessment and avoid the problem of them leaving before the end point assessment is taken. However, one size does not fit all, and the proposed changes may not fit all apprenticeships. The process also needs to be easy for employers, providers and EPAOs to work through.
4. Changes which simplify the assessment process and reduce the burden on learners are generally helpful, and could have a significant, positive impact on completion. The proposed change, including integration of mandatory qualifications, will mean the apprenticeship is closely linked to both the EPA and the qualification. However, we need to be sure that this is necessary for all apprenticeships and does not create an unnecessary burden for some. There are already a significant number of mandatory qualifications within an apprenticeship and, whilst integrating them may simplify the process of completion of some apprenticeships, it may not do so for all.
5. We appreciate that Trailblazer bodies need to submit a rationale for the integration of mandatory qualifications into end-point assessment, so this should mean there is evidence to support the need for mandatory qualifications. However, this change of assessment should be carefully trialled and only introduced into all apprenticeship assessment plans when the relevant industry need can be demonstrated.
6. The impact on the availability of assessors needs to be taken into consideration. Not all EPAOs are awarding organisations, potentially increasing the cost of professional memberships, end-point assessments and on-programme qualifications. The change creates the need for providers to undertake more activity post-gateway, which is not currently recognised or funded. We do not agree that providers should be expected to pick up the costs associated with this extra assessment. We also already know that

providers are struggling in some cases to recruit specialist teachers and assessors, so this point must be taken into consideration too.

7. The subjects chosen to be in the first band of apprenticeships are very broad. They are likely to benefit from the integration of mandatory qualifications into end-point assessment, but this may not always be the case.
8. Therefore, we only agree that the proposals will work if each industry qualification is considered on its own merit, and any additional costs of delivering qualifications, registration and assessment are not added to the professional qualification costs or imposed on providers.

### **C. Answers to specific questions**

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

9. Agree. Qualifications should only be mandated if they fulfil a regulatory, professional body or labour market. We do not agree with mandating for its own sake.

**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?**

10. Agree. The fuller the occupational coverage, the less requirement for integrated, mandated qualifications.

**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?**

11. Agree. If a qualification is regarded as mandatory by an industry body, it must meet specific criteria.

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

12. Agree. Unless there is up-to-date labour market demand, there is no justification for a qualification to be mandatory.

**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.**

13. Agree. All qualifications should have met an approved process to ensure suitability and high quality.

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

14. Agree. This makes sense as the specification will be clear to awarding organisations, learners, professional bodies and employers.

**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.**

15. Agree. Mandated qualifications should not go wider than the knowledge, skills and behaviours (KSB) required by the occupational standard.

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

16. Agree. There is no obvious value in mandated qualifications being at a higher level than the apprenticeship as this may make it too difficult for the apprentice to complete the end-point assessment.

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

17. Neither agree nor disagree. We have already stated that generally integrating mandatory qualifications is helpful, but we also know that this may not apply to all qualifications.

18. Making a qualification mandatory and integrating it into the EPA may add a complication and mean the end-point assessment is more stressful for the apprentice as it becomes an 'all or nothing' scenario. This is especially the case if the apprentice is unable, for any reason, to complete the end-point assessment or mandated element of the qualification.

**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.**

19. We agree that there may be examples of where integration is not appropriate or possible, as stated above in our answer to Question 10. This may be the case for EPAs in new industries, or those where the demonstration of good practice will change over a period of time and hence evidence of good practice shown at EPA does not ensure good practice at a later date.

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

20. Agree. If a subset of KSBs are identified as important, then that same subset should be assessed as the integrated assessment, as long as there is no duplication in assessment.

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

21. Disagree. The defined subsets of KSBs may be assessed by multiple smaller qualifications. This includes KSBs such as knowledge which can be gained from short online qualifications.

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

22. Agree. The assessment would be unwieldy if more than one subset of the KSB is assessed.

**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.**

23. The approach seems sensible, and we hope it does work. However, there are many possible approaches to integration, and we believe that the IfATE should keep an open mind as to other approaches, as well as trialling the proposed new approach to ensure it works in all apprenticeships.

**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?**

24. Agree. It is important that the EPA's assessment plan indicates the qualification's grade boundaries for the occupational competence so that those taking the qualification know the boundaries within which they are working. This also gives a framework for consistency by assessors.

**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?**

25. Agree. The Awarding Bodies should approve and set the qualification's integrated assessments to ensure independence and reliability. The AO's decisions should, however, be informed by the relevant professional bodies.

**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.**

26. Agree. Centre adaptation may lead to inconsistencies in the EPA experience. The approach is usually far more likely to be independent when adaptation is undertaken at a level removed from the centre. However, as we have made clear throughout this response, this has to work for all apprenticeships.

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

27. Agree in principle. However, this may be difficult for centres to achieve in practice as assessors are in short supply for some industries and for some subjects.

**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?**

28. Agree in principle. However, as stated in our answer to Question 18 above, this may not always be possible in practice.

**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.**

29. Neither agree nor disagree.

30. We agree this is a good idea in principle, but it might mean an increased cost of assessment to the centre, which would not be helpful. It may depend on what "sufficiently independent" means in practice.

**Q21: To what extent do you agree that integrated 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?**

31. Agree to a combination of the above. The awarding organisation must be able to demonstrate independence, but we also know that centre staff with sufficient independence may be required to assess in some instances where there is a shortage of appropriate staff.

32. We should trust the independence of awarding organisations and centre staff with sufficient independence to ensure the assessment takes place in a timely manner.

**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.**

33. Yes. There are costs involved in decisions to change assessment. Awarding organisations can increase their charges on an annual basis, but centres are not funded to cover these increased charges. The training of assessors, the changes in assessment plans and any additional cost of equipment for integrated assessments are usually borne by the centre. This is unreasonable.

**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.**

34. Yes. Each change in terms of integrated assessment should be risk assessed and the cost borne by the AOs, government or IfATE in the first instance.

**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.**

35. Yes. We should not overlook the fact that this may have a disproportionate impact on those with disabilities and disadvantage who make up a proportion of the people who undertake apprenticeship end-point assessments.

36. A great deal also depends on the EPA when integrated assessments are involved. This may cause stress to the apprentice which must be avoided.

## **D. Conclusion**

37. We agree with most of the proposals set out in this consultation, but we are concerned that a one size fits all approach is being proposed. What works in some example apprenticeships may not work in others.
38. We suggest that the model proposed is trialled so that we can be sure the proposals will work for all apprenticeships.
39. We are also concerned about any added costs to centres which are already struggling to recruit assessors and to pay additional costs associated with energy, materials and equipment.
40. 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 it can.

Dr Anne Murdoch, OBE  
Senior Advisor, College Leadership  
Association of School and College Leaders  
February 2023

## **A few stylistic points**

- We treat organisations, including ourselves, as singular – so ‘ASCL believes’ rather than ‘ASCL believe’; ‘Ofsted is’ rather than ‘Ofsted are’.
- The first time you use an acronym, spell it out, with the acronym included in brackets afterwards. Subsequently, just use the acronym. So ‘Research from the Education Policy Institute (EPI) tells us that... Furthermore, EPI researchers found that...’.
- Use the definite article when talking about the government and the education department – so ‘The government should...’, ‘The department should...’, ‘The Department for Education should...’. But don’t use it when you abbreviate the Department for Education to DfE – so ‘DfE should...’.
- Consider using shorter sentences. If your sentence spans more than two lines, chances are the reader will start to lose the thread. Consider whether it could be broken up into two or more shorter sentences.
- If you refer to other publications, hyperlink to them from the main text. Don’t worry about also including them as footnotes.
- Fonts and font sizes should be as in the template, i.e. Arial 14 point for the title, 12 point for the headings, 11 point for the main text (including questions and answers).
- Don’t use the ‘add space before/after paragraph’ functionality; just leave a line break.