

A public consultation on degree apprenticeships

A revised model aiming to bring together the best of theoretical and practical training in this new route into graduate occupations

July 2021



CONTENTS

1.	WHO THIS CONSULTATION IS FOR	3
	1.1. Issue date	3
	1.2. Enquiries.....	3
	1.3. The response.....	3
	1.4. How to respond.....	3
	1.5. Deadline for responses	3
2.	EXECUTIVE SUMMARY AND SUMMARY OF PROPOSALS.....	4
3.	SUMMARY OF PROPOSED CHANGES.....	6
4.	WHY ARE WE UNDERTAKING THIS CONSULTATION NOW?	8
5.	CHANGE 1 – BETTER SUPPORTING GRADUATE-ENTRY OCCUPATIONS.....	10
	5.1. Proposal.....	10
	5.2. Objectives of the proposal.....	10
	5.3. How we plan to implement the proposed change	10
	5.4. Questions we would like respondents to consider	11
6.	CHANGE 2 – INTEGRATION OF ON-THE-JOB AND OFF-THE-JOB TRAINING	13
	6.1. Proposal.....	13
	6.2. Objectives of the proposal.....	13
	6.3. How we plan to implement the proposed change	13
	6.4. Questions we would like respondents to consider	14
7.	CHANGE 3 – ALIGNMENT BETWEEN APPRENTICESHIP KSBS AND DEGREE LEARNING OUTCOMES.....	15
	7.1. Proposal.....	15
	7.2. Objectives of the proposal.....	15
	7.3. How we plan to implement the proposed change	15
	7.4. Questions we would like respondents to consider	16
8.	CHANGE 4 – INTEGRATION OF ASSESSMENT	17
	8.1. Proposal.....	17
	8.2. Objectives of the proposal.....	17
	8.3. How we plan to implement the proposed change	17
	8.4. Questions we would like respondents to consider	18
9.	CHANGE 5 – PARTICIPATION OF AN INDEPENDENT ASSESSOR WITH OCCUPATIONAL EXPERTISE	19
	9.1. Proposal.....	19
	9.2. Objectives of the proposal.....	19
	9.3. How we plan to implement the proposed change	19
	9.4. Questions we would like respondents to consider	20
10.	WHAT DOES THIS MEAN FOR OTHER APPRENTICESHIPS?	21
11.	IMPLEMENTATION OUTLINE BASED ON ASSUMPTION OF AGREEMENT	22

11.1. Questions we would like respondents to consider	22
12. ANNEX A - IMPACT ASSESSMENT	23
12.1. Data sources.....	23
12.2. Assumptions	23
12.3. Standards	24
13. EQUALITY IMPACT ASSESSMENT	25
13.1. The public sector equality duty.....	25
13.2. Starts	26
13.3. Questions we would like respondents to consider	27
14. FULL SET OF CONSULTATION QUESTIONS	29
14.1. Generic/Intro questions	29

1. Who this consultation is for

This degree apprenticeship consultation provides anyone with a relationship to apprenticeships an opportunity to provide feedback on the changes the Institute are proposing to the model of degree apprenticeships that it will approve, following engagement with employer and HE representatives.

If you have used, delivered, assessed or undertaken a degree apprenticeship or employed a degree apprentice we would value your response to this consultation. Utilising your experiences with degree apprenticeships, we would like to understand how these proposals will affect you, your organisation, and your industry or sector.

We also welcome views from those who are considering engaging with degree apprenticeships in some way, and others, such as professional bodies, providing your insight as to whether these proposals and whether proposals will support employers in your industries and sectors to better meet their skills needs.

1.1. ISSUE DATE

16th July 2021

1.2. ENQUIRIES

Enquiries.IFA@education.gov.uk

1.3. THE RESPONSE

The Institute will analyse all the responses to this consultation and will aim to publish the findings on the Institute website no later than early autumn 2021. Further details on the Institute's proposed timeline for the consultation, finalised policy publication and implementation can be found later in this document.

1.4. HOW TO RESPOND

Responses can be provided via an online form at the following link:

<https://www.instituteforapprenticeships.org/reviews-and-consultations/consultations/degree-apprenticeships-consultation/>

1.5. DEADLINE FOR RESPONSES

Midnight 16th September 2021

2. Executive summary and summary of proposals

This consultation sets out proposals from the Institute for Apprenticeships and Technical Education ('the Institute') for changes to existing policies that affect the development, approval and delivery of degree apprenticeships.

Although relatively technical in nature, these changes are intended to:

1. Ensure that the Institute's policies and processes better recognise the role that Degrees and graduate status currently play in the labour market;
2. Provide a comprehensive development and approval framework for the creation and revision of degree apprenticeships; and
3. Ensure that degree apprenticeships are a distinctive offer that secures the best of apprenticeships and the best of higher education.

Overall, we believe this will enable degree apprenticeships to better support the skills ambitions of employers, individuals and the nation.

Why degree apprenticeships matter

Level 6 plus and degree apprenticeships play an increasingly important role in our education and skills system, enabling employers to meet their skills needs and supporting productivity. Furthermore, degree apprenticeships provide individuals with pathways into highly skilled occupations, offering alternatives to traditional, full-time higher education. In addition to supporting the economy, therefore, degree apprenticeships have the potential to help widen participation in higher education and employment and support social mobility.

Employer demand for level 6 plus and degree apprenticeships continues to grow since the first degree apprenticeship was approved in 2015. In 2019/20 academic year, there were over 30,000 starts on apprenticeships at levels 6 and 7, including over 20,000 starts on degree apprenticeships including in high value areas such as digital, healthcare and engineering, amongst others. We want to build on these strong foundations and continue to optimise degree apprenticeships for both employers and individuals.

The Institute already works closely with employers to develop and approve degree apprenticeships. While this process has created almost 100 degree apprenticeships since 2015, we have listened carefully to employers who have told us that the existing approach does not appropriately recognise the currency of the degree in the labour market, which in some cases limits the extent to which these apprenticeships could support employers' skills needs.

Furthermore, evidence indicates that for many highly skilled occupations, graduate status is often a necessary attribute to enable an individual to achieve career progression in the sector they work in. As the Government's Industrial Strategy(<https://www.gov.uk/government/publications/uk-industrial-strategy-a-leading-destination-to-invest-and-grow>) sets out, research predicts around 1.8 million new jobs will be created between 2014 and 2024, and 70 per cent of them will be in the occupations most likely to employ graduates. Annual labour market information produced by the Office for National Statistics also shows that for several Standard Occupational Classification (SOC) two-digit

occupations where there is a similar approved level 6 or level 7 standard, over 60% of the workforce in the profession hold a degree as their highest level of qualification, including in professions in teaching and health.

As employers have told us, there is therefore a risk that apprentices in specific industries and sectors may be placed at a disadvantage compared to their labour market peers, in the absence of an approach to the inclusion of degrees in level 6 and 7 apprenticeships that reflects the labour market currency that the degree holds. It is in this context that we wish to consult on proposals which collectively aim to optimise degree apprenticeships for employers and apprentices.

Why we are reviewing our degree apprenticeship policy

We now have over four years' experience of approving degree apprenticeships. With this experience in mind, the Institute has considered, with employers, the HE sector and apprentices, how best to optimise these already in-demand apprenticeships.

To support the outcomes listed above, the Institute is proposing five specific changes to its requirements of degree apprenticeships. While these changes, in a technical sense, relate to what the Institute will be able to approve as a degree apprenticeship in the future, they are reflective of changes that we wish to see in the way that degree apprenticeships are designed, developed and delivered to ensure that these apprenticeships better reflect real labour market requirements.

3. Summary of proposed changes

The proposed changes affect the development, approval, delivery and assessment of degree apprenticeships. Collectively, the proposals ensure that the Institute's approach to the inclusion of degrees in apprenticeships more appropriately reflects the high currency of the degree in the labour market, whilst continuing to optimise the design and delivery of degree apprenticeships to ensure a high-quality experience for employers and apprentices.

Please note: these are policy proposals and are subject to consultation outcomes and future spending decisions.

3.1. Change 1

We will amend our mandatory qualifications policy so that it better recognises the currency of degrees, including where there are no specific subject discipline requirements for entry to an occupation. In doing this, if they wish to, employers will be able to mandate degrees in apprenticeship standards that will be occupationally-specific for graduate-entry occupations at level 6 and level 7.

3.2. Change 2

Degrees within a degree apprenticeship should fully integrate with the on-the-job training and development that apprentices experience in the workplace. Providers should therefore ensure that off-the-job training (the degree) complements and integrates with on-the-job experience in the workplace (provided by the employer). This expectation will inform the ways in which degree apprenticeships are developed by trailblazer groups, and we will also provide better guidance about how employers and training providers are expected to integrate training delivered on- and off-the-job. This reflects good practice already delivered in many degree apprenticeships, and we would like to make this the norm.

3.3. Change 3

In support of change 2 we will require that the learning outcomes of any degree mandated in an apprenticeship standard will reflect the requirements of the occupation through alignment with the knowledge, skills and behaviours (KSBs) in the employer-specified occupational standard. As with change 2, this is already best practice in some degree apprenticeships. This will require Higher Education Institutions (HEIs) to develop and validate degrees specifically aligned to the apprenticeship standard, noting that this may already be the case for some regulated occupations.

3.4. Change 4

Changes 2 and 3 will align degree achievement and learning for occupational competence. As a result we will approve degree apprenticeships only where the end-point assessment (EPA) of occupational competence in a degree apprenticeship will integrate with the final assessment of the degree. The objective is to ensure that neither the degree nor the apprenticeship can be awarded in isolation from the other, with the EPA acting as a capstone for both.

3.5. Change 5

We will require the integrated EPA of all degree apprenticeships to include assessment by trained individuals with appropriate occupational and industry expertise. All assessment panels will be required to have at least one suitable individual who is independent of the HEI. In line with existing good practice in many HEIs, this will assist with securing the occupational specificity of assessment by mitigating the potential conflict of interests present in integrated degree apprenticeship assessment and drawing in an occupational perspective.

4. Why are we undertaking this consultation now?

In the six years since their launch¹ employers, coalescing together as apprenticeship trailblazer groups, have developed 100 degree apprenticeships. These apprenticeships sit alongside a further 42 apprenticeships that trailblazers have developed during this time at levels 6 and 7 which do not include a mandatory degree.

The 100 degree apprenticeships all include a full Bachelor or Masters degree as part of the apprenticeship, and there is no doubt that these apprenticeships are popular with employers and apprentices. Furthermore, research undertaken by UUK in 2019², concluded that employers value collaborative working with HEIs when developing apprenticeships.

Despite this popularity and as part of broader apprenticeship reforms to ensure apprenticeships are more employer-led, the policy governing the Institute's ability to mandate qualifications has sometimes introduced barriers to employers' desire to mandate degrees in certain occupations. Since Spring 2018 the Institute has evaluated employer proposals for new degree apprenticeships in line with its existing mandatory qualifications policy. This policy applies to all apprenticeships, and currently seeks to ensure that qualifications are mandated in apprenticeships only where a specific qualification provides necessary labour market currency. The consequence for degree apprenticeships has been that trailblazers have been required to demonstrate that specific degrees in specific subjects are a requirement for entry into the relevant occupation, which has prevented the mandation of degrees in apprenticeship standards where it is the graduate status that is a labour market requirement.

The Institute, along with the DfE, is currently reviewing its approach to the use of other qualifications in apprenticeships, building on employer feedback and the lessons of over five years of delivery of apprenticeship standards. More information about this work will be made available in due course. However, we think there is value in moving ahead with a refreshed approach to degree apprenticeships now, given the unique status of the degree in the labour market, as well as the fact that as these apprenticeships have become more popular in recent years, there are important lessons we have learnt which we will apply to optimise degree apprenticeships for employers and apprentices as far as possible. We also judge that degree apprenticeships will benefit most from establishing a clear brand and distinctive characteristics that employers, apprentices, their parents, and the rest of the education system can engage with and understand.

A note on 'integration': the term 'integration' is used in two ways in the context of degree apprenticeships: integrated EPA, and integrated delivery of on-the-job with off-the-job training. Integrated EPA means that the assessment of the apprenticeship is combined with the assessment of at least part of the degree. This has often been achieved by allocating credits to the part of the degree assessment that is also the apprenticeship EPA. Integrated delivery of training ensures close integration between the training delivered by the training provider and

¹ [PM announces rollout of flagship degree apprenticeships - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/pm-announces-rollout-of-flagship-degree-apprenticeships)

² <https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2019/future-degree-apprenticeships.pdf#search=degree%20apprenticeship>

on-the-job training delivered by the employer in the workplace, to ensure full competence is achieved in the most efficient and effective manner.

5. Change 1 – Better supporting graduate-entry occupations

5.1. PROPOSAL

We will amend our mandatory qualifications policy to recognise the currency of degrees, including where there are no specific subject discipline requirements for entry to an occupation. In doing this, if they wish to, employers will be able to mandate degrees in apprenticeship standards at levels 6 and 7 where there is sufficient evidence that graduate status is a labour market requirement in the occupation. There will be no compulsion on employers to develop a degree apprenticeship if they do not want to (i.e. if they would prefer to develop an apprenticeship at level 6 or level 7 that does not lead to the award of a degree).

This is different to the current approach, in which the Institute requires trailblazers to demonstrate that specific degrees in specific subjects are a prerequisite for occupational entry, prior to approving the creation of a new degree apprenticeship.

5.2. OBJECTIVES OF THE PROPOSAL

This will extend the scope of degree apprenticeships so that they can support occupations where graduate status is a labour market requirement (as opposed to the existing approach whereby employers need to demonstrate that a specific degree in a specific vocational area is required for a degree to be considered for inclusion in the apprenticeship) and employers see the value in creating degree apprenticeships.

5.3. HOW WE PLAN TO IMPLEMENT THE PROPOSED CHANGE

To enable this the Institute will respond to trailblazer requests to develop a degree apprenticeship in the following way.

1. Provide a basket of labour market data, reflecting existing entry requirements to the occupation and the qualifications held by current workers. We think that this 'basket' of data may include the following, but respondents to this consultation are invited to suggest other sources of data that should be taken into account:
 - a. Standard Occupational Classifications descriptions: these are provided by the Office for National Statistics (ONS) as a classification of occupational information for the UK.
 - b. ONS data on 'highest qualification': this is data provided by ONS on the highest qualification held by individuals in each SOC. It indicates whether the majority of people working in the occupation have a degree.

- c. Academic research into occupations: for instance, ‘Classifying Graduate Occupations for the Knowledge Society’ by Elias and Purcell (2013)³ and ‘The changing graduate labour market’ by Green and Henseke (2014)⁴.
 - d. Any other appropriate, robust data identified by trailblazer groups or the Institute, subject to it meeting criteria defined by the Institute.
2. Work with the trailblazer to make an informed choice about the impacts of developing a degree apprenticeship. We set out in changes 2, 3, 4 and 5 later in this document the requirements that employers will need to ensure have been met in order for an occupation to be supported by a degree apprenticeship.
 3. In a change to current practice, we will agree at the beginning of development whether the case for mandating a degree in the apprenticeship standard is likely to meet the policy criteria set out here and support the trailblazer group to develop the apprenticeship accordingly. In effect, while the apprenticeship standard will be approved by the Institute at the end of the development process, we will seek to confirm its status as a degree apprenticeship as early in the process as possible to support employers as they develop the apprenticeship.
 4. There will still be cases where it is appropriate that an apprenticeship is developed at level 6 and 7 that does not include a degree as a mandatory qualification. This could be for a number of reasons, including:
 - a. Evidence shows that the occupation does not currently predominantly recruit graduates (a degree is generally not a labour market requirement in the occupation);
 - b. The employers are consciously trying to create a new route into the occupation that is not conditional on the acquisition of a degree;

We expect that the proposal set out under change 1 will ensure that degree apprenticeships are designed to better support employers’ skills needs. The Institute will not anticipate or influence changes in the labour market by mandating degrees for occupations that do not already typically require graduate status from entrants, unless as a result of changing regulations governing the occupation.

5.4. QUESTIONS WE WOULD LIKE RESPONDENTS TO CONSIDER

- i. Do you agree or disagree with the proposal set out in ‘Change 1’?
[agree/neutral/disagree]
- ii. Do you agree or disagree with the proposed evidence base (as outlined in point 1 above) on which the Institute will evaluate whether an occupation is a graduate

³ [elias_purcell_soche_final.pdf \(warwick.ac.uk\)](#)

⁴ [The changing graduate labour market: analysis using a new indicator of graduate jobs \(springeropen.com\)](#)

occupation suitable for a degree apprenticeship? [agree/neutral/disagree + optional free text box]

- iii. Is there any other evidence the Institute should consider in its evaluation of whether an occupation is a graduate occupation suitable for a degree apprenticeship? Please note if any suggestions made are specific to a sector or occupational route. [free text box]
- iv. Are there any reasons why you think this proposal will not achieve its intended objective? (*free text*)

6. Change 2 – Integration of on-the-job and off-the-job training

6.1. PROPOSAL

Degrees within a degree apprenticeship should fully integrate with the on-the-job training and development that apprentices experience in the workplace. This objective will inform the ways in which degree apprenticeships are developed by trailblazer groups, and we will also provide better guidance about how training providers, working with employers, are expected to integrate training delivered on- and off-the-job. This reflects good practice already delivered in many degree apprenticeships, and we would like to make this the norm.

6.2. OBJECTIVES OF THE PROPOSAL

Apprenticeships work best when learning and experience in the workplace and off-the-job training delivered by the training provider are fully integrated and mutually reinforcing. This is the case for all apprenticeships and it is equally true for degree apprenticeships. We want to ensure that degree apprenticeships are designed so as to best support apprentices to achieve full occupational competence. This will assist in the delivery of the broader objectives of these proposals, in particular ensuring that a degree apprenticeship delivers the full benefits of both an apprenticeship and also the acquisition of a degree. In many cases, this is already established good practice; we will codify this and communicate it as an expectation in all degree apprenticeships.

Research indicates that one of the main factors contributing to the success and sustainability of degree apprenticeships is developing work-integrated, learner-centred programmes with effective learner support, up-to-date content and resources, and effective use of online learning (Lester and Bravenboer, 2020⁵, p58).

6.3. HOW WE PLAN TO IMPLEMENT THE PROPOSED CHANGE

To this end we are proposing that, for degree apprenticeships (as is the expectation for all apprenticeships), providers should ensure that off-the-job training (in this case the degree) integrates with and complements the on-the-job experience provided by the employer in the workplace as far as possible, so that the two are mutually reinforcing and support apprentices to achieve full occupational competence. We will publish detail about this expectation and how it will be expected to work in practice. The ESFA's apprenticeships funding rules for the

⁵ [\(PDF\) Sustainable Degree Apprenticeships \(researchgate.net\)](#)

delivery of off-the-job training will continue to apply and providers will be required to ensure delivery is compliant with these rules.

6.4. QUESTIONS WE WOULD LIKE RESPONDENTS TO CONSIDER

- v. Do you agree or disagree with the proposal set out in 'Change 2'?
[agree/neutral/disagree]
- vi. Are there any reasons why you think this proposal will not achieve its intended objective? (*free text*)
- vii. Are there any additional ways in which you think the objective to integrate on- and off-the-job training can be achieved? (*free text*)

7. Change 3 – Alignment between apprenticeship KSBs and degree learning outcomes

7.1. PROPOSAL

In support of change 2 we will require that the learning outcomes of any degree mandated in an apprenticeship standard will reflect the requirements of the occupation through alignment with the knowledge, skills and behaviours in the employer-specified occupational standard. As with change 2, this is already good practice in some degree apprenticeships. This will require HEIs to develop and validate degrees specifically aligned to the apprenticeship standard, noting that this may already be the case for some regulated occupations.

7.2. OBJECTIVES OF THE PROPOSAL

Degree apprenticeships remain a relatively new approach to both apprenticeships and higher education. From the conception and roll out of these programmes in the last six years, the Institute, employers, apprentices and higher education have learnt about what works well including what good practice looks like.

We know that degree apprenticeships work best when all elements of learning contribute to the award of the degree qualification, the achievement of the apprenticeship and the realisation of employers' expectations of a competent individual. Alignment between the degree learning outcomes and KSBs will ensure that all training contributes towards developing the learner's occupational competence.

7.3. HOW WE PLAN TO IMPLEMENT THE PROPOSED CHANGE

Individual HEIs will need to validate occupationally-specific degrees for the degree apprenticeship based on the employer-specified definition of competence in the occupation approved by the Institute. This will apply even where access to the occupation does not always require a degree in a specific discipline. HEIs will not be funded to deliver degrees as part of an apprenticeship that do not align to the apprenticeship standard, though an employer may choose to fund additional content at their own expense, if they choose to do so. We expect that it will be possible for HEIs to commence this work in partnership with employers as the apprenticeship is developed or revised, noting that the decision to mandate a degree or otherwise will have been settled earlier in the development process.

7.4. QUESTIONS WE WOULD LIKE RESPONDENTS TO CONSIDER

- viii. Do you agree or disagree with the proposal set out in 'Change 3'?
[agree/neutral/disagree]
- ix. Are there any reasons why you think this proposal will not achieve its intended objective? (free text)
- x. Are there any additional ways in which you think the objective to align the learning outcomes of the apprenticeship and degree can be secured? (free text)

8. Change 4 – Integration of assessment

8.1. PROPOSAL

Changes 2 and 3 will ensure that achievement of a degree fully aligns with and supports the requirements of the apprenticeship standard to achieve occupational competence. . As a result we will approve degree apprenticeships only where the end-point assessment (EPA) of occupational competence in a degree apprenticeship will integrate with the final assessment of the degree. The objective is to ensure that neither the degree nor the apprenticeship are awarded in isolation from the other, with the EPA acting as a capstone for both.

8.2. OBJECTIVES OF THE PROPOSAL

Approximately half of degree apprenticeships are currently non-integrated. This means that the degree is achieved prior to the end point assessment being undertaken by the apprentice. This introduces significant risk of duplicating assessment and can diminish apprentices' incentive to complete their end-point assessment of occupational competence.

Integration of the degree and apprenticeship assessments will reduce the burden of assessment for apprentices, while providing a single coherent quality assessment that confirms both the competence of an individual and the achievement of the requirements for the award of a degree. Moreover, it will assist in achieving better alignment between the on- and off-the-job training.

8.3. HOW WE PLAN TO IMPLEMENT THE PROPOSED CHANGE

The Institute does not intend to prescribe how employers and HEIs should deliver integration in EPA plans, although we will provide examples of how it can be achieved. Rather, we intend to set out the principle and to support trailblazer groups to secure it when developing a degree apprenticeship. This means that the EPA plan will need to be developed with the full participation of HEIs to design an assessment plan that meets the requirements of an apprenticeship and also the requirements of a degree award. Furthermore, employers and HEIs may also wish to work with relevant professional bodies to achieve alignment between these and the assessments leading to professional recognition. This collaborative working approach will not only ensure that competence can be fully assessed in EPA but also provide

the time for robust assessment to be designed and developed that satisfies the Framework for Higher Education Qualifications⁶.

It will remain the case that a synoptic EPA will be a requirement of all degree apprenticeships, just as in other apprenticeships. EPA plans will only be approved if they conform to the requirements of EPA laid out by the Institute. An EPA plan must be devised in a way which it will not be possible to pass either the degree or the apprenticeship in isolation from one another. However, the EPA component may be in addition to credits built up during the course of the degree. Change 5, below, will also help secure the existing requirement for independence in apprenticeship EPA.

The arrangements for external quality assurance of integrated degree apprenticeship EPA will remain unchanged. The Office for Students in partnership with the Quality Assurance Agency for Higher Education will externally quality assure that the assessment of degree apprenticeships conforms with the EPA plan and other requirements of degree apprenticeship assessment published by the Institute and Education & Skills Funding Agency (ESFA).

8.4. QUESTIONS WE WOULD LIKE RESPONDENTS TO CONSIDER

- xi. Do you agree or disagree with the proposal set out in 'Change 4'?
[agree/neutral/disagree]
- xii. Are there any reasons why you think this proposal will not achieve its intended objective? (free text)
- xiii. Are there any additional ways in which you think the objective to integrate the assessment of degree apprenticeships can be secured? (free text)

⁶ [The Frameworks for Higher Education Qualifications of UK Degree-Awarding Bodies \(qaa.ac.uk\)](http://qaa.ac.uk)

9. Change 5 – Participation of an independent assessor with occupational expertise

9.1. PROPOSAL

We will require the integrated EPA of all degree apprenticeships to include assessment by trained individuals with appropriate occupational and industry expertise. All assessment panels for degree apprenticeships will be required to have at least one independent individual with appropriate industry and occupational expertise to ensure EPA is fair and robust. In line with existing good practice in many HEIs, this will assist with securing the occupational specificity of assessment by addressing the conflicts inherent in integrated degree apprenticeship assessment and drawing in an occupational perspective.

9.2. OBJECTIVES OF THE PROPOSAL

The aim of any apprenticeship is the achievement of competence in a specific occupation by an apprentice. This is secured through learning, delivered in the workplace and with the training provider, that is aligned to an employer-specified definition of competence laid out in the apprenticeship standard. It is then tested holistically in an employer-specified end-point assessment at the end of the apprenticeship.

To secure confidence in the currency of the apprenticeship certificate as a signal of competence, it is essential that assessment is carried out with the involvement of individuals with appropriate occupational and industry expertise. The independence of these individuals will also assist in the mitigation of the potential for a conflict of interest in integrated degree apprenticeships, where the assessment is carried out by the training provider and awarding body of the mandatory qualification.

9.3. HOW WE PLAN TO IMPLEMENT THE PROPOSED CHANGE

The specific requirements for a suitably qualified independent assessor and the role of that person in the assessment will be defined in EPA plans approved by the Institute, and HEIs will be required to comply with these requirements in their assessments. These requirements will be devised by the trailblazer group and approved by the Institute.

The independent external assessor will be expected to have a voice equal to other members of the assessment panel in the assessment of the degree apprenticeship. The independent external assessor may not be employed by the same organisation as the apprentice being assessed, or the HEI, or drawn from an organisation on the Institute's Employer Directory that supports external quality assurance. External quality assurance that the EPA has been

delivered in line with the requirements of the EPA plan will be carried out by the Office for Students in partnership with the Quality Assurance Agency for Higher Education.

9.4. QUESTIONS WE WOULD LIKE RESPONDENTS TO CONSIDER

- xiv. Do you agree or disagree with the proposal set out in 'Change 5'?
[agree/neutral/disagree]
- xv. Are there any reasons why you think this proposal will not achieve its intended objective? (free text)
- xvi. Are there any requirements that the Institute should lay out for the appointment of independent assessors with occupational expertise? (free text)

10. What does this mean for other apprenticeships?

This consultation focuses on degree qualifications at level 6 and level 7, and their inclusion within apprenticeships. We are also undertaking a review of the other, non-degree, qualifications used in apprenticeships, governed by the Institute's mandatory qualifications policy.

We expect to engage with stakeholders on the mandatory qualifications policy review later this year.

11. Implementation outline based on assumption of agreement

Following consultation, we will take some time to analyse responses and decide whether to proceed as set out in this document. The implementation timeline set out below is intended to help respondents and others consider the impact of these proposals and when they will take effect. It should not be taken as an indication that decisions have already been made. If we need to change the implementation timescales in response to changes following consultation, we will. The proposals included here are also subject to future spending decisions.

The implementation timeline below is based on 2 assumptions:

1. That we are able to agree the proposals set out above and communicate them by autumn 2021; and
2. That the proposals we are implementing are broadly those set out in this consultation.

We therefore plan to:

- Publish our decisions in a consultation response by autumn 2021
- Publish new approvals criteria and guidance by autumn 2021
- Begin approving apprenticeship standards (new and revised) against the new criteria and guidance from spring 2022
- From autumn 2021, we will discuss with trailblazer groups currently developing degree apprenticeships how they wish to take forward those developments. They may need to revise their development timelines to enable them to meet the expectations set out under changes 2, 3, 4 & 5 and we will seek to confirm whether the occupation is suitable to become a degree apprenticeship at this time.

11.1. QUESTIONS WE WOULD LIKE RESPONDENTS TO CONSIDER

- xvii. Do you have any concerns or foresee any problems with the timeline as set out?
(yes/no + free text)

12. Annex A - Impact Assessment

12.1. DATA SOURCES

Data included about starts and demographics uses Department for Education (DfE) data from the Individualised Learner Record (ILR). The DfE do not accept responsibility for any inferences or conclusions derived from the data.

Information about published standards is available on the [Institute website](#).

12.2. ASSUMPTIONS

The full impact of the proposed policy is not yet known. The process for finding graduate occupations and providing additional evidence will be further developed if the consultation feedback suggests this is an appropriate approach.

For the purposes of the impact assessments, a view has been taken that the existing apprenticeship standards potentially impacted will be:

- Existing apprenticeship standards with a non-integrated degree
There is a high likelihood these standards will be impacted by the proposed policy. Integration would be a requirement, which could mean changes to the occupational standard and EPA plan.
- Existing apprenticeship standards with a non-regulated degree
There is a possibility these standards will be impacted by the proposed policy.

Where a degree is regulated in a standard, it will likely remain a degree apprenticeship under both policies. This could vary for non-regulated degrees.

Some non-regulated degree apprenticeships may not meet the current criteria. The proposed policy widens these criteria. This means more of these non-regulated degree standards might be able to remain a degree apprenticeship if trailblazers choose to propose this when the apprenticeship standard is revised.

- Existing level 6 and 7 apprenticeship standards without a degree
There is potential these apprenticeship standards will be impacted by the proposed policy.

Level 6 and level 7 apprenticeships which do not currently contain a mandated degree may be able to become degree apprenticeships if the trailblazer considers it appropriate when the standards are revised and the new criteria are met.

There is also a possibility that trailblazer groups may come forward to develop degree apprenticeship standards at level 6 and level 7 in circumstances where the Institute's approvals criteria have previously prevented the mandation of a degree in an apprenticeship standard for a particular occupation.

12.3. STANDARDS

There were 600 apprenticeship standards approved for delivery as at 26 March 2021. Of these:

- 139 are at level 6 or 7.
- 43 have a non-integrated degree qualification.
- 80 have a non-regulated degree qualification.
- 42 are at level 6 or 7 and do not have a degree qualification.

There is some overlap between the non-regulated and non-integrated standards, so these are not stand-alone categories.

Of the standards approved on 26 March 2021:

	Non-integrated degrees	Non-regulated degrees	Level 6 or 7 without a degree
Agriculture, environmental and animal care	2	3	1
Business and administration	2	3	5
Care services	-	1	-
Construction	10	13	-
Creative and design	3	5	5
Digital	-	6	1
Education and childcare	-	-	2
Engineering and manufacturing	16	26	5
Health and science	9	13	8
Legal, finance and accounting	-	2	10
Protective services	-	2	1
Sales, marketing and procurement	-	3	2
Transport and logistics	1	3	2

This shows the policy could apply more to the Engineering and Manufacturing, Construction and Health and Science routes than other routes.

12.3.1. Starts

The 2019/20 academic year covers apprenticeship starts between August 2019 and July 2020.

These starts cover:

- 85 standards at level 6 or 7 with 30,500 starts
- 17 standards with a non-integrated degree with 11,300 starts
- 51 standards with a non-regulated degree with 16,700 starts
- 24 level 6 and 7 standards without a degree with 11,600 starts

13. Equality Impact Assessment

13.1. THE PUBLIC SECTOR EQUALITY DUTY

Under Section 149(1) of the Equality Act 2010, the Institute for Apprenticeships and Technical Education has a duty to have due regard to the need to:

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it

38. The relevant 'protected characteristics' for the purposes of each element of the Public Sector Equality Duty are:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race (including ethnicity)
- Religion or belief
- Sex
- Sexual orientation

The Institute also needs to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first aim of the duty outlined at a) above applies to this characteristic but that the other aims outlined at b) and c) (advancing equality and fostering good relations) do not apply.

13.1.1. Protected characteristics not covered

Information on apprentices' sexual orientation, religion and beliefs, pregnancy, and gender re-assignment are not collected as part of the ILR. This means we do not hold up-to-date data on these characteristics. This means we cannot fully assess whether the proposed policy is likely to have differing impacts on people with different characteristics in this area.

13.2. STARTS

The 2019/20 academic year covers apprenticeship starts between August 2019 and July 2020. The demographic profile of all currently approved level 6 and 7 standards cannot be assessed, because some are newly approved and/or had no starts in that year.

Gender

For starts across all level 6 and 7 standards, male apprentices make up 55.1% of starts. This is higher for starts on non-regulated degree apprenticeships (59.7% male).

Policy changes which affect non-regulated degree apprenticeship standards could have more of an impact on males than females.

This could be partly due to the balance of subjects covered by the non-regulated degree apprenticeships. Of the standards approved on 26 March 2021, the majority of non-regulated degree apprenticeships were in the following routes:

- Engineering and manufacturing (26 standards)
- Construction (13 standards)
- Health and Science (13 standards)

Ethnicity

There are some starts where the ethnicity of an apprentice is not recorded. These starts are excluded when calculating percentages. BAME is used as the term to combine Black/African/Caribbean/ Black British; Asian/Asian British; Mixed/Multiple ethnic groups; and Other ethnic groups.

Table of ethnicity of apprentices for 2019/20 starts on level 6 and 7 standards, where ethnicity is recorded.

	All level 6 and 7	Non-integrated	Non-regulated	Level 6 or 7 without a degree
BAME	17.6%	15.4%	13.7%	23.6%
White	82.4%	84.6%	86.3%	76.4%
Starts	29,400	10,700	16,100	11,300

Level 6 or 7 standards without a degree have a comparatively high representation of Asian/Asian British apprentices (15.6%) and 23.6% of starts are BAME. These standards currently do not have degrees, but the future policy could widen out the opportunities for degrees in these areas if the Trailblazer think it is right and the new criteria is met.

Disability

The available categorisation in the ILR identifies if an apprentice considers themselves to have a learning difficulty and/or disability and/or health problem (LLDD). For some starts no information is provided and have been excluded from the percentages.

The table below shows LLDD representation is lowest for level 6 and 7 standards without a degree (6.0%). The proportion is higher for non-integrated and non-regulated standards degree standards (8.9%).

Table of reported LLDD apprentices for 2019/20 starts on level 6 and 7 standards, where recorded.

	All level 6 and 7	Non-integrated	Non-regulated	Level 6 or 7 without a degree
LLDD	8.1%	8.9%	8.9%	6.0%
Not LLDD	91.9%	91.1%	91.1%	94.0%
Starts	29,000	10,500	15,700	11,300

Age

Age refers to the age of the apprentice when they start their apprenticeship. The majority of starts for 2019/20 at level 6 and 7 were for apprentices over the age of 25 (54.5%).

The non-regulated cohort has a higher proportion of under 20s (16.4%) than level 6 and 7 overall. The proposed policy could provide opportunities for degree apprenticeships for this younger cohort.

The integration of existing non-integrated degrees will most impact over 25s.

Table of the age of apprentices started their apprenticeship for 2019/20 starts on level 6 and 7 standards.

	All level 6 and 7	Non-integrated	Non-regulated	Level 6 or 7 without a degree
Under 20	12.3%	11.6%	16.4%	8.1%
20-24	33.2%	10.8%	20.6%	55.1%
25 and over	54.5%	77.6%	63.0%	36.8%
Starts	30,500	11,300	16,700	11,600

13.3. QUESTIONS WE WOULD LIKE RESPONDENTS TO CONSIDER

- xviii. Do you believe the proposed arrangements (any or all) would have a positive impact on particular groups of apprentices? (yes/no)
- xix. If you have answered 'yes' to question 1 above, please explain your reasoning. (free text)

- xx. Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of apprentices? (yes/no)
- xxi. If you have answered 'yes' to question 3 above, please explain your reasoning. (free text)

14. Full set of consultation questions

14.1. GENERIC/INTRO QUESTIONS

1. Which of the below best describes your viewpoint in this consultation?
 - a. (drop down list/tick box) Employer, Employer Provider, EPAO, Trailblazer member, HEI, Non-HE apprenticeship provider, Occupation Representative Body, Education Representative Body, Apprentice
2. Have you engaged with apprenticeships previously?
 - a. (drop down list/tick box) Yes with degree apprenticeships, Yes with L2-7 apprenticeships, No but plan to in the next 12 months, No and do not intend to
3. (if yes to Q2) What, engagement with apprenticeships have you had so far?
 - a. (drop down list/tick box) Employed apprentices, Am a current apprentice, Am a former apprentice, Deliver multiple levels of apprenticeships, Deliver only degree apprenticeships, Deliver and assess only degree apprenticeships
4. (free text field – not sure if this is a good idea or not?) We welcome your honest thoughts and feedback and as such this is an anonymous consultation, but if you would like to be kept up to date with progress as we work through and implement any changes, please note your email below:

Change 1

- i. Do you agree or disagree with the proposal set out in 'Change 1'?
[agree/neutral/disagree]
- ii. Do you agree or disagree with the proposed evidence base (as outlined in point 1 above) on which the Institute will evaluate whether an occupation is a graduate occupation suitable for a degree apprenticeship? [agree/neutral/disagree + optional free text box]
- iii. Is there any other evidence the Institute should consider in its evaluation of whether an occupation is a graduate occupation suitable for a degree apprenticeship? Please note if any suggestions made are specific to a sector or occupational route. [free text box]
- iv. Are there any reasons why you think this proposal will not achieve its intended objective? (*free text*)

Change 2

- v. Do you agree or disagree with the proposal set out in 'Change 2'?
[agree/neutral/disagree]

- vi. Are there any reasons why you think this proposal will not achieve its intended objective? (*free text*)
- vii. Are there any additional ways in which you think the objective to integrate on- and off-the-job training can be achieved? (*free text*)

Change 3

- viii. Do you agree or disagree with the proposal set out in 'Change 3'?
[agree/neutral/disagree]
- ix. Are there any reasons why you think this proposal will not achieve its intended objective? (*free text*)
- x. Are there any additional ways in which you think the objective to align the learning outcomes of the apprenticeship and degree can be secured? (*free text*)

Change 4

- xi. Do you agree or disagree with the proposal set out in 'Change 4'?
[agree/neutral/disagree]
- xii. Are there any reasons why you think this proposal will not achieve its intended objective? (*free text*)
- xiii. Are there any additional ways in which you think the objective to integrate the assessment of degree apprenticeships can be secured? (*free text*)

Change 5

- xiv. Do you agree or disagree with the proposal set out in 'Change 5'?
[agree/neutral/disagree]
- xv. Are there any reasons why you think this proposal will not achieve its intended objective? (*free text*)
- xvi. Are there any requirements that the Institute should lay out for the appointment of independent assessors with occupational expertise? (*free text*)

Implementation timeline

- xvii. Do you have any concerns or foresee any problems with the timeline as set out?
(yes/no + *free text*)

Impact Assessments

- xviii. Do you believe the proposed arrangements (any or all) would have a positive impact on particular groups of apprentices? (yes/no)
- xix. If you have answered 'yes' to question 1 above, please explain your reasoning. (*free text*)

xx. Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of apprentices? (yes/no)

If you have answered 'yes' to question 3 above, please explain your reasoning. (free text)



**Institute for Apprenticeships
& Technical Education**

Institute for Apprenticeships and Technical Education

**151 Buckingham
Palace Rd,
London SW1W
9SZ**

**Cheylesmore House,
5 Quinton Rd,
Coventry CV1 2WT**