



Consultation on Conditions, guidance and requirements for Ofqual-regulated Apprenticeship End Point Assessments

Response from the Chartered Association of Business Schools

4 May 2018

The original request for feedback is available at:

<https://www.gov.uk/government/consultations/regulating-apprenticeship-end-point-assessments>

About the Chartered Association of Business Schools

We are a membership body and represent around 120 UK business schools and higher education providers, as well as affiliate stakeholders, corporate members and international partners. The UK's business and management education sector represents 1 in 7 university students and contributes £3.25bn to the UK economy. Business Schools are amongst the first Higher Education providers to offer degree apprenticeships. To maximise the success of this initiative it is vital that there is dialogue between Ofqual and the QAA to clarify regulatory responsibility over apprenticeships delivered by the HE sector.

Consultation questions

Q1: To what extent do you agree or disagree with our proposal to provide end-point assessment specific guidance in relation to conflicts of interest covering the areas set out?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

In general we disagree with the proposed guidance as it makes no reference to QAA as one of the potential bodies that could provide external quality assurance. We are concerned about the possibility for conflicting regulations in the case of qualifications offered by Higher Education Institutions (HEIs) that fall under the remit of both Ofqual and QAA regulations. The potential for conflict is particularly evident in the case of level 4 and 5 apprenticeships.

Such contradictions can only be resolved by Ofqual and the QAA and there is an urgent need for dialogue between the two bodies so that a sensible solution to this problem is found. We believe that the existing external examiner framework governed by the QAA is sufficiently robust to be used for the regulation of end-point assessments for integrated degree apprenticeships.

Q2: To what extent do you agree or disagree with our proposal to apply an end-point assessment specific version of Condition B3, covering the areas set out?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

We support the proposal to remove events that relate to an end-point assessment organisation issuing certificates unless there is a professional statutory requirement to do so. We agree that this will help to avoid confusion with the overall apprenticeship certificate issued by ESFA.

Q3: To what extent do you agree or disagree with our proposal to put in place end-point assessment specific guidance setting out when Condition C2 will, and will not, apply to end-point assessments?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

If an awarding organisation uses centres to deliver elements of a qualification on its behalf, including the end-point assessment, then the regulatory framework should include safeguards so that there is scrutiny on how the centre is selecting the assessors for the end-point assessment, to ensure they are performing their duties in a reliable way. The people used by the centres should be properly trained and qualified and should apply the end-point assessment in a reliable, consistent and fair manner. However, we need to ensure that this only applies to the end-point assessment, and not any qualification that may be awarded separately as part of the apprenticeship.

Q4: To what extent do you agree or disagree with our proposal to put in place end-point assessment specific guidance setting out the need, as part of keeping its qualifications under review, to have regard to the Institute's reviews and feedback?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

We agree with this proposal, with the proviso that there is clear and strong agreement between the various regulators (Ofqual and QAA) and the IfA.

Q5: To what extent do you agree or disagree with our proposal to disapply Condition E1 in respect of end-point assessments?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

We agree that condition E1 should be disappplied because the qualification objective is already set out in the apprenticeship standard. What is most important is that awarding organisations comply with the appropriate quality assurance requirements in administering and delivering that standard.

Q6: To what extent do you agree or disagree with our proposal to set a Condition requiring compliance with assessment plans?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

We do not agree with this proposal for reasons already outlined in our response to question 1.

Q7: To what extent do you agree or disagree with our proposal to put in place an end-point assessment specific Condition on the completion of gateway requirements?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments: None.

Q8: To what extent do you agree or disagree with our proposal to disapply Condition E7 in respect of end-point assessments?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments: None.

Q9: To what extent do you agree or disagree with our proposal to disapply Condition E8 in respect of end-point assessments?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments: None.

Q10: To what extent do you agree or disagree with our proposal to put in place end-point assessment specific guidance about the titling of end-point assessments?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments: None.

Q11: To what extent do you agree or disagree with our proposal to continue to require end-point assessment organisations to publish specifications for end-point assessments?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments: None.

Q12: To what extent do you agree or disagree with our proposal to produce end-point assessment specific guidance setting out how Condition E3 applies in respect of end-point assessments?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

We do not agree with this proposal as publishing specific guidance would create duplication.

Q13: To what extent do you agree or disagree with our proposal to no longer suspend Conditions E3.2(l), E3.4(a) and E3.4(c)?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

We disagree with this proposal and would prefer that these conditions remain suspended. In respect to condition E3.2 (l), EPAs have already been defined as non-credit bearing and therefore this condition should not apply. In relation to conditions E3.4 (a) and E3.4 (c), we think these are inappropriate as hours should not be attached to EPAs.

Q14: To what extent do you agree or disagree with our proposal to put in place an end-point assessment specific Condition to require the level of the end-point assessment to match that of the apprenticeship standard?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

We recognise this condition as appropriate as long as it is not overly bureaucratic as it is already normal operating procedure for universities to ensure alignment in the level at which teaching and assessments are delivered. Our main concern relates to the fourth bullet point on p.26 as it is our understanding that the IfA has the contractual obligation to inform all relevant bodies where a standard or level has been changed rather than the awarding organisation as stated in the consultation document.

Q15: To what extent do you agree or disagree with our proposal to put in place end-point assessment specific guidance setting out how an end-point assessment organisation should comply with Conditions D1, E4 and G1 relating to ensuring assessments that are set are fit for purpose and can be delivered?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

Where there is an external body involved in carrying out the end-point assessment the regulations must be rigidly followed and the organisations held to account for reliability, consistency and objectivity in applying the end-point assessment.

Q16: To what extent do you agree or disagree with our proposal to put in place an end-point assessment specific Condition to require end-point assessment organisations to provide materials for the purposes of Ofqual's evaluation and to take any actions specified by Ofqual as a result?

- Strongly agree
- Agree

- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

Under the integrated model an external examiner would perform the role of reviewing the materials used for assessments. We are therefore against the introduction of this proposal for integrated degree apprenticeships. This is another area where the agreement between Ofqual and the QAA is required, even for non-integrated degree apprenticeships.

Q17: To what extent do you agree or disagree with our proposal to put in place end-point assessment specific guidance setting out how an end-point assessment organisation should comply with Conditions H1 and H2 in relation to marking and moderation?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

We broadly support these suggestions but do not want to see additional bureaucracy as a result given that universities already follow these procedures as a matter of normal operations. We also believe that stand-alone end-point assessment organisations should be required to moderate their own assessors.

Q18: To what extent do you agree or disagree with our proposal to put in place end-point assessment specific guidance for Condition H6 on issuing results for end-point assessments?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

Universities abide by this principle anyway so we would not oppose it. This guidance is more applicable to external bodies and ensuring they are held to account on this principle.

Q19: To what extent do you agree or disagree with our proposal to disapply Conditions I3 and I4 in respect of end-point assessments?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please provide any comments:

Where it doesn't create confusion we concur that there does need to be clarity on what the certificate is for and contingency for situations where the certificate is lost by the learner. But this shouldn't conflict with the ESFA who will also make the award to certify that an individual is competent at that standard. The key here is to issue certificates where necessary but to avoid the potential for duplication and confusion.

Q20: We have set out the ways in which our proposals could impact (positively or negatively) on learners who share a protected characteristic. Are there any potential impacts that we have not identified?

No response.

Q21: Are there any additional steps we could take to mitigate any negative impact, resulting from our proposals, on learners who share a protected characteristic?

No response.

Q22: Do you have any other comments on the impacts of our proposals on learners who share a protected characteristic?

No response.

Q23: We have not identified any ways in which our proposals will unduly increase the regulatory impact on end-point assessment organisations. Do you have any comments on this assessment?

We believe that Ofqual's proposals will generate additional bureaucracy if applied to integrated degree apprenticeships where the institution is not permitted to apply its own quality assurance processes. The potential for additional administrative burden is magnified in the case of level 4 and 5 apprenticeships where both Ofqual and the QAA would have oversight.

Q24: Are there any additional steps we could take to reduce the regulatory impact of our proposals?

See previous answer - there will be significant additional costs for universities if the sector is not permitted to use its existing quality assurance framework.

Q25: Are there any costs or benefits associated with our proposals which we have not identified?

See previous answer.

Q26: We have not identified any ways in which our proposals will prevent innovation by end-point assessment organisations. Do you have any comments on this assessment?

No response.

Q27: Do you have any comments on our proposed End-point assessment Qualification Level Conditions?

No response.

Q28: Do you have any comments on our proposed End-point assessment Qualification Level Guidance?

No response.