



Department  
for Education



Department  
for Business  
Innovation & Skills

## The Future of Apprenticeships in England: Next steps from the Richard Review - Response form

A copy of the consultation on **The Future of Apprenticeships in England: Next steps from the Richard Review** can be found at:

<https://www.gov.uk/government/consultations/future-of-apprenticeships-in-england-richard-review-next-steps>

You can complete your response via the [online survey](#)

Alternatively, you can email or post this completed response form to:

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

The closing date for this consultation is: **22 May 2013**

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- Yes, I would like you to publish or release my response
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### Your details

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

- Business representative organisation
- Independent Training Provider
- College
- 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)

Founded in 1976, The Royal Academy of Engineering promotes the engineering and technological welfare of the country. Our fellowship – comprising the UK’s most eminent engineers – provides the leadership and expertise for our activities, which focus on the relationships between engineering, technology, and the quality of life. As a national academy, we provide independent and impartial advice to Government; work to secure the next generation of engineers; and provide a voice for Britain’s engineering community.

1. The government agrees that Apprenticeships should be designed for and targeted at those at the outset of a new job role or occupation, to train them in the skills needed for that job and to provide a springboard for their future careers. This includes helping people to advance within their existing employment, where the Apprenticeship is firmly focused on training for a job at a higher skilled level. Most important is that substantial learning takes place, with the application and practice of new knowledge and skills in a real workplace. For those already experienced and competent in their roles, Apprenticeships will not be the right approach – unless they are advancing to a substantially higher skilled role.

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

The labour market evidence is overwhelming: Apprenticeship yields very substantial wage premium over a working lifetime. This is because the skills developed by the individual are valuable to their employer. However, it should be acknowledged that wages vary between occupations, sectors and skill levels. Research published by the Royal Academy of Engineering (for example *Jobs and growth*, RAEng, 2012, Greenwood et al, RAEng, 2011) and many others show the superior labour outcomes obtained by those who

1. Work in science, engineering and technology (SET) occupations
2. Hold qualifications in STEM subjects

This, coupled with the fact that Apprenticeships in engineering have remained a significant plank of skills provision in engineering over the decades (when Apprenticeship in many sectors had been largely forgotten until relatively recently) means that **the average wage premium over a working lifetime so often quoted for Apprenticeship is in large part due to the inclusion of engineering Apprenticeships in the calculations.**

**The particular contribution to the positive Apprenticeship brand made by engineering Apprenticeships should not be under-estimated.**

**The most important role for government at this important point in the history of Apprenticeship is to safeguard and protect the Apprenticeship brand.**

Therefore, our first contribution to this submission is to urge government to set conditions where Apprenticeships in all sectors follow the general pattern for engineering Apprenticeships:

- Being a real job with real training and an entry route into a skilled occupation.
- Being **substantial**: long duration, measured in years and not months, providing not only the technical competence needed to do the job and the necessary underpinning academic knowledge, but also provide the space and experience for young people to acquire the employability skills and self-confidence to succeed in work.
- Tending towards Level 3 or increasingly Level 4
- Having genuine and clear links to systems of professional registration

Our second contribution is to note that the significant wage premium over a working life for Apprenticeship will only remain if engineering Apprenticeships are a significant proportion

of all Apprenticeships. Although we note useful growth in engineering Apprenticeships over recent years, this is dwarfed by rapid growth of lower wage return Apprenticeships in other sectors.

Being real jobs with significant skills, the growth of engineering Apprenticeships will always be limited by growth in the productive side of the economy. This remains a challenge.

**Therefore, to preserve the positive brand of Apprenticeship government must set conditions that limit the growth of low value, low level, short duration ‘Apprenticeships’.**

Therefore, to be clear, in order to ensure that every Apprenticeship delivers substantial new skills, government should be restrictive in what counts as an Apprenticeship. Engineering Apprenticeships at Levels 3 and 4 should be held up by government as exemplars of real Apprenticeship. This would boost the brand value of Apprenticeship as well as promoting engineering careers to young people at a time when the demand for engineers and technicians in the UK economy exceeds supply (RAEng, *Jobs and growth*, 2012).

2. The Richard Review recommends that every Apprenticeship should be based on employer-designed industry standards. It recommends that these new standards should focus on outcomes and mastery of the occupation or major job role, and should replace Apprenticeship frameworks, the current qualifications which comprise them and the national occupational standards which underpin them. The new standards would set out simply and clearly what employee in that occupation or major job role will need to be able to do.

The government agrees, and believes that employers should take responsibility for designing these new standards. We are seeking views on the best way to bring employers together to do this – for example through a competition, or a facilitated or collaborative approach.

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

Where available in a sector, professional registration should be used as the benchmark standard. For engineering this means UKSPEC and the *EngTech* standard in particular.

Professional bodies licensed to approve or accredit systems of training should be central to the design of new standards for Apprenticeship. For engineering this means the 36 Professional Engineering Institutions and Engineering Council as the licensing body.

Professional registration is a key outcome, but it is critical that employers collaborate through their professional bodies, sector skills councils and any other relevant mechanism to define and agree the core standards that underpin apprenticeship frameworks.

3. The Richard Review recommends that the government should set criteria that the new Apprenticeship standards should meet, as below. This is that they should:

- be stretching;
- deliver transferable skills;
- have significant buy in across the sector, including from SMEs, and be deliverable by small employers;
- require substantial training and take more than a matter of months to become competent at – involving training significantly beyond that offered to all new staff;
- include skills which are relevant and valuable beyond just the current job, supporting progression within the sector; and
- reflect a real job, not generic skill

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

Engineering Apprenticeships display all of these characteristics. Government should use them as an exemplar of effective practice.

4. The Richard Review recommends that there should be just one Apprenticeship standard and qualification for each occupation or major job role. He proposes that these should set out what an Apprentice should be able to do and know at the end of their Apprenticeship, in a way that is relevant and meaningful for employers.

The government recognises the strong arguments set out in the Review that there should be only one standard. We also recognise that for some sectors the nature of individual jobs may vary significantly between employers, even for job roles that are nominally the same. We need to find a solution to take account of this – for example through a “core and options” approach for each standard and qualification, increasing their flexibility to different settings and contexts whilst ensuring a rigorous core of essential knowledge and skills.

**Question 4: Should there be only one standard per Apprentice occupation/job role?**

Yes

No

Don't know

**Please explain your response:**

Yes. For engineering UK-SPEC should be the standard for all Apprenticeships from level 3 upwards. UK-SPEC does not cover competencies or qualifications at level 2 or below. Because the standard has to apply across a range of employers where there is differentiation of engineering skills needed, a 'core and options' approach to populating frameworks will be required. One standard but differentiation in the way that it is applied.

5. The Richard Review recommends that there should be just one Apprenticeship standard and qualification for each occupation or job role. And that these should set out what an Apprentice should be able to do and know at the end of their Apprenticeship, in a way that is relevant and meaningful for employers.

The government recognises the arguments set out in the Review that having just one qualification per standard could maximise recognition, consistency and transferability, and make it easier to assure that quality is maintained. However ending the market in qualifications would be a significant step, and there are other options – for example agreeing a single standard but retaining a market in qualifications to test against it.

**Question 5: Should there be only one qualification per standard?**

Yes

No

Don't know

**Please explain your response:**

Engineering occupations are distributed pervasively throughout the whole of the UK economy (RAEng, *Jobs and growth*, 2012). Therefore, it is impossible to specify a single qualification. There should be one standard (UKSPEC) and under this, approved qualifications. The Engineering Council provides this for engineering

<http://www.engc.org.uk/education--skills/technicians/database-of-technician-qualifications>

6. Our proposals to replacing the current Apprenticeship Frameworks with new employer-designed standards and qualifications would be a significant reform, and will need careful planning and collaboration.

We would like views on how best to manage the transition from the current system of multiple frameworks and qualifications to the more streamlined system of standards and qualifications which are recognised and valued by learners, employers and educational institutions.

For example - in the short term there may be merit in reviewing existing frameworks and / or the qualifications contained within these to remove those that employers do not value or which are furthest away from the new expectations for Apprenticeships

**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?**

Engineering Apprenticeships display all of these characteristics. Government should use them as an exemplar of effective practice.

7. Once the new Apprenticeship standards are agreed it will be important that they remain rigorous, stretching and relevant to employers.

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

Where available in a sector, professional registration should be used as the benchmark standard. For engineering this means UKSPEC and the *EngTech* standard in particular.

UKSPEC is reviewed and updated every five years.

8. Whilst some employers already contribute to the design and development of assessment, we agree with the Review on the benefits of employers playing an increased role in this area. This relates both to the design of the final test for the occupation or major job role and to the ongoing arrangements for assessing the competence of apprentices who take this, working with awarding organisations. Increased employer involvement will help to build trust in the credibility and rigour of the assessment process. In pursuing this, we will need to ensure that we do not ask more from employers than they have the capacity to do, which will vary between sectors and occupations.

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

The Review of Adult Vocational Qualifications underway at the UKCES provides an exemplar of employer engagement in the qualifications system. The Royal Academy of Engineering is supporting that review **for engineering** with detailed and evidenced analysis of STEM qualifications provided through its FE STEM data project and reports. These can be found at

[http://www.thedataservice.org.uk/Statistics/fe\\_data\\_library/other\\_statistics\\_and\\_research/](http://www.thedataservice.org.uk/Statistics/fe_data_library/other_statistics_and_research/)

Government needs to urge or require other sectors to follow suit with their own detailed analysis of vocational qualifications in their sector.

9. The Review proposes that employers also have a more direct role in being part of the final assessment of individual Apprenticeships. We are keen to explore how this might be achieved in practice, without placing undue burden on employers and recognising the expertise required of professional assessors. The role of such professionals will continue to be important.

We propose therefore to include assessment as a further area to be considered by those developing Apprenticeship standards. Employers would be invited to set out what an effective test of competency against the standards they wish to set would be, and how the arrangements for its delivery might work.

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

Using UKSPEC as the standard for engineering Apprenticeships, final assessment would be carried out by members of the engineering profession as it is done now.



10. The key principles of assessment in any education or training system are independence, consistency and the maintenance of standards over time. Independent assessment should be demonstrably objective, separated from any individual or organisation with an incentive for whether the individual passes or fails. This might be achieved, for example, by ensuring that assessment is fully independent of training delivery. Or, where this is not possible, through robust arrangements for independent verification to ensure objectivity is maintained. By consistency we mean that the outcome of the assessment should not vary between different settings, workplaces or areas.

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

Awarding bodies should no longer be the principal architects of new or revised qualifications. Professional bodies need to take a much more prominent role in determining systems of assessment that are fit for purpose in the context of professional standards being the under-pinning of Apprenticeship.

11. Apprenticeships today, as a result of the qualifications they contain, often focus heavily on continuous assessment. This can be at the expense of new teaching and learning. Indeed, some Apprentices tell us that their Apprenticeship experience has been dominated by assessment alone. Re-focusing on assessment at the end will allow trainers to spend more time teaching, not testing.

**Question 11: How should we implement end point assessment for Apprenticeships?**

Using UKSPEC as the standard for engineering Apprenticeships, final assessment for professional registration would be carried out by members of the engineering profession as it is done now.

However, engineering Apprenticeships are typically 42 months in duration and it would be impossible to test the totality of learning at the end point. On-going assessment will have to remain as an important element as learning is delivered fundamentally "on the job" and apprentices need to be able to demonstrate competence of particular skills before moving onto new areas of the job.

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

We support the E4E submission on this issue:

*There should not be a grading system for Apprentices. The measure should be competent or not. Professional registration is based on UK-SPEC which is a threshold standard; there is no grading system in place.*

*For the technical certificate as part of an apprenticeship, the existing Pass, Merit, Distinction grades (eg a BTEC Level 3 Diploma) are well understood by employers and Higher Education, and will enable progression to Higher Apprenticeships or traditional part-time higher education routes.*

13. From August 2014, we will require all Apprentices who begin their Apprenticeship with only level 1 qualifications in English and/or maths to work towards level 2 attainment in these subjects during their Apprenticeship. At this interim stage Apprentices will not need to have achieved level 2 English and maths in order to successfully complete their Apprenticeship.

In future years our ambition is to go further, so that all Apprentices (including those starting without a level 1 in English or maths) must achieve level 2 English and maths as part of their Apprenticeship.

**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?**

Fluency with mathematics is vitally important to engineers and technicians. We are concerned that currently 40% of young people in England fail to achieve level 2 maths at key stage 4. And of those young people who do not achieve A\*-C maths GCSE at 16, only 17% will go on to achieve L2 maths by the age 19.

Government must do more to improve the state of mathematics education in England.

**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?**

No specific comment.

15. Our proposed reforms, focusing on final competency and removing the detailed prescription and incremental assessment that many Apprenticeships involve today, will give greater scope to train in more flexible ways. We want more empowered employers, working with training providers and learners, to shape each individual Apprenticeship. Our reforms will incentivise greater responsiveness, innovation and dynamism in training delivery, with more new entrants to the market bringing fresh ideas and approaches. We want to encourage this, and also spread good practices and take full advantage of the opportunities offered by new technologies.

**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?**

No specific comment.

16. We recognise the benefits for Apprentices of having sufficient time to learn and reflect well away from their “day job”, and share Doug Richard’s concerns that many Apprentices today lack sufficient time away from their workplace and off-site. This brings the opportunity for additional training, and gives the time and space to gain fresh perspectives and consolidate learning. Further benefits can come from shared learning with other Apprentices. We want to ensure this is a core component of every Apprenticeship, without undermining employers’ ability to shape each Apprenticeship as they see fit.

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

No specific comment.

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

Yes

No

Don't know

**Please explain your response:**

The *technical certificate* (a knowledge based qualification) has always been an important component of engineering Apprenticeships – as has a training course on safe methods of working typically taken in the first year of an engineering Apprenticeship. These are typically taken at a College or training centre and certainly away from the shop floor.

18. Employers need to be able to trust in basic safeguards for the legitimacy, quality and capacity of training providers they may wish to deal with. The Skills Funding Agency checks the financial credentials, capacity and any Ofsted inspection record of training providers receiving public funding. We will build on these arrangements to ensure that, as far as possible, they are an effective assurance of training quality as well as financial health, and that this information is accessible to employers to support their choice of provider. In doing so, we must ensure a process that facilitates new providers entering the market. We are also developing a “chartered status” concept, to give employers a visible symbol for high quality and responsive training organisations.

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

No specific comment.

19. We agree that voluntary, employer led kitemarking could play a role in helping employers find the right occupation-specific training. We believe it is for industry and professional bodies in each sector to judge this, and to develop and implement any schemes they believe appropriate. The aim would be to guide employers towards those providers with a strong record and offering good service in their particular area. A number of models are possible, and it may often be that the best approach will differ between sectors. However, if there is strong support for kitemarking in a number of sectors, there may be a case for an overarching framework and branding to reduce the scope for confusion and burdens on providers.

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

Yes

No

Don't know

**Please explain your response:**

We support the E4E submission on this issue:

*This would not be appropriate for engineering .The kitemark for the engineering profession exists through UK-SPEC. We would strongly oppose any attempt to introduce a new kitemark for our sector.*

20. The government has a particular responsibility to make the data it collects easily available for others to make good use of. This is an area in which we recognise we can do better, and we agree the emphasis that Doug Richard has placed on this.

The government's Digital Strategy signals our intent to do more to harness the creativity and innovation of the private sector, to enable the development of tools and services that maximise the value of data collected by Government.

**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?**

The Royal Academy of Engineering provides detailed and evidenced analysis of STEM qualifications through its FE STEM data project and reports. These can be found at [http://www.thedataservice.org.uk/Statistics/fe\\_data\\_library/other\\_statistics\\_and\\_research/](http://www.thedataservice.org.uk/Statistics/fe_data_library/other_statistics_and_research/)

Government needs to urge or require other sectors to follow suit with their own detailed analysis of vocational qualifications in their sector.

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

We support the E4E submission on this issue

*E4E has consistently argued that the current provision of Careers IAG for young people is wholly inadequate and the whole policy on careers advice should be overhauled.*

*While there is a duty on schools to provide independent advice for students from year 8, the type and quantity of the provision is left up to schools. Therefore a school can execute its duty by way of an online careers website or a set of resources in the school library. There is no duty for face to face careers guidance.*

*Further, in a competitive funding system, there is no incentive on schools to promote alternative pathways that might suit the learner but which would reduce income for the school itself. The Institution of Civil Engineers has carried out in-depth interviews with over 70 Level 3 apprentices. Without exception, they had found their apprenticeships by chance without any careers advice. Most had started sixth form studies and become disenchanted with AS and A Levels and had therefore repeated learning at Level 3.*

*For higher apprenticeships, we would welcome UCAS becoming a central application portal for both higher education institutions and employers offering apprenticeships level 5+.*

22. There is some excellent practice in forging meaningful connections between industry and education, but we accept that this is by no means universal and varies by both place and sector. We are committed to improving employer links with schools, colleges and other training providers. Current activity includes work by the National Careers Service, National Apprenticeships Service and local employer partnerships, as well initiatives led by third sector organisations.

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

The Royal Academy of Engineering co-leads the Tomorrow's Engineers programme with EngineeringUK on behalf of the professional engineering community. This initiative delivers careers information on the various pathways through the engineering profession to young people from year 7.

23. It is important that we assess the impacts, both direct and indirect, of the reforms set out in the government's response to the Richard Review of Apprenticeships. Initial screening suggests that of the groups with protected characteristics some of the changes proposed could directly or indirectly impact in terms of gender, ethnicity, age and disability. We would welcome views on this issue from all respondents and particularly organisations representing these groups and others that may be affected.

**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.**

We have established that engineering is central to a positive brand image for Apprenticeship. However, more needs to be done to recruit a more diverse set of engineering Apprentices – less than 5% are women for example.

In the re-positioning of Apprenticeship, more should be done to re-dress this imbalance. The model of *employer ownership of skills* at UKCES might be used for this.

**Question 24: Do you have any further comments on the issues in this consultation?**

No

**Thank you for taking the time to let us have your views on this consultation. We do not acknowledge receipt of individual responses unless you tick the box below.**

**Please acknowledge this reply**

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