



## **Education Select Committee inquiry: the quality of apprenticeships and skills training**

### **Submission from the Quality Assurance Agency for Higher Education (QAA)**

#### **Introduction**

1 QAA is the UK's independent higher education quality body. Our mission is to safeguard standards and improve the quality of UK higher education, wherever it is delivered around the world.

2 We do this by delivering quality assurance activities, including managing a process of external peer review, on behalf of the UK's higher education funding bodies. This includes institutions that deliver the qualification or degree element of higher level or degree apprenticeships.

3 QAA is responsible for the design, management and development of the UK Quality Code for Higher Education on behalf of the higher education sector, working with the UK-wide Standing Committee for Quality Assessment. The Quality Code gives all higher education providers a shared starting point for setting, describing and assuring the academic standards of their higher education awards and programmes, and the quality of the learning opportunities they provide.

4 Our remit covers higher education providers of all types; not only universities, but further education colleges that offer higher education programmes, specialist colleges and 'alternative providers' - private and not-for-profit higher education providers that do not receive public funding from the higher education funding councils.

5 Although this inquiry's terms of reference primarily focus on the quality and regulation of lower level apprenticeships and skills training, our experience and expertise is in higher education, and our evidence relates specifically to the operation of higher apprenticeships. We believe there are learnings from our experience that could be of assistance to the Committee's inquiry.

#### **Executive summary**

6 QAA is a member of the Institute for Apprenticeships' Quality Alliance, and we are working with higher education providers and apprenticeships experts to produce guidance on delivering these programmes at a higher level. We have an important role in the quality assurance of apprenticeships in higher education settings.

7 Universities and colleges have strong employer links and are well versed in how to design, develop and deliver high quality qualifications as part of an apprenticeship. However, the higher education regulatory framework in England is changing, and the apprenticeships framework is still bedding down. Consequently there is a need for guidance for higher education providers in navigating through these changes.

8 Many employers operate across the UK, and employers and apprentices alike will want to know that their investment has currency across the UK. These interests are best served by finding common ground in regulatory and quality approaches wherever possible, and for apprenticeship policy in all nations of the UK to be developed with this principle in mind.

### **Changes in arrangements for the quality assurance of higher and degree apprenticeships**

9 Universities and other higher education providers have long delivered qualifications as part of apprenticeships. The Higher Education Funding Council for England (HEFCE) has up until recently had statutory responsibility for assessing the quality of higher education programmes in England, including higher and degree apprenticeships, and has commissioned QAA to undertake quality reviews of providers.

10 The Office for Students (OfS) became the English HE sector's regulator in January 2018, and the transition to a new regulatory framework has commenced. The Higher Education and Research Act 2017, which established the OfS, also gives the Secretary of State for Education the power to designate a body to independently assess quality and standards of higher education in England. QAA was the only organisation to submit an Expression of Interest for this role. Consultation with the higher education sector and stakeholders is complete, and a decision on designation is expected in Spring 2018.

11 QAA is a member of the Institute for Apprenticeships' Quality Alliance, alongside Ofsted, Ofqual, HEFCE, the National Apprenticeship Service and the Department for Education. We have advised the Department for Education as it developed its Apprenticeships Accountability Statement, setting out the regulatory responsibilities of each of the organisations involved. QAA has also provided a higher education perspective to the Institute for Apprenticeship's quality statement<sup>1</sup>, which was published in November following a public consultation. The statement defines what an apprenticeship is, what a high-quality apprenticeship looks like and how that should be judged.

12 The higher education regulatory framework in England is changing, and the apprenticeships framework is still bedding down. Consequently there is a need for guidance for higher education providers in navigating through these changes.

13 In May 2017, QAA published *Quality Assuring Higher Education in Apprenticeships: Current Approaches*<sup>2</sup>. The document aims to set out for the higher education sector, employers, apprentices and other stakeholders the ways in which apprenticeship models are accommodated by current quality assurance approaches, as well as to identify areas where apprenticeship models may require existing principles to be interpreted and applied in new ways. It describes how expectations relating to the quality assurance of higher education, as set out in the Quality Code, accommodate and apply to existing and emerging UK models of apprenticeships involving higher education qualifications at undergraduate and postgraduate level. Its development was facilitated by QAA, working with an expert group that included representatives of universities and colleges, government departments, funding bodies, the University Vocational Awards Council, the National Centre for Universities and Business, and apprentices' representative group, the Society of Apprentices.

14 We are working with the same expert group to develop a characteristics statement for apprenticeships that include a higher education award. This would mirror statements that

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<sup>1</sup> <https://www.instituteforapprenticeships.org/quality/what-is-a-quality-apprenticeship>

<sup>2</sup> <http://www.qaa.ac.uk/en/Publications/Documents/Quality-assuring-higher-education-in-apprenticeships-2017.pdf>

we have produced for other forms of higher education, such as Foundation Degrees. Characteristics statements describe the distinctive features of a particular type of higher education qualification in terms of its purpose, general characteristics and generic outcomes. They are intended to provide a further level of detail to qualification descriptors provided in the UK's Qualifications Frameworks.

15 Most universities and colleges are well versed in how to design and deliver high quality courses with significant work or practice-based components, and have no problem applying this to the qualification element of an apprenticeship in higher education. However, we are aware that those new to apprenticeship provision would welcome guidance on the practicalities of delivering an apprenticeship, particularly where the requirements might differ to typical practice in the higher education sector. For example, clear guidance on an apprentice's rights and responsibilities as an employee as well as a learner. QAA will seek to work with the IfA, OfS and the sector to develop further guidance that responds to the needs of higher education providers and supports them in delivering high quality provision as part of a good apprenticeship programme.

### **A UK-wide approach**

16 While education policy is largely devolved, higher education retains a UK-wide approach. QAA works across the UK. Though regulatory and quality assurance approaches differ across the four jurisdictions to address different priorities and contexts, the UK Quality Code provides a common framework. A consultation is currently underway on proposals to redesign and simplify the Quality Code, to ensure it remains fit for purpose across jurisdictions, taking into account these differing approaches. This will also ensure a certain level of consistency in apprenticeships in higher education settings across the UK.

17 Similarly, there are different apprenticeship policy drivers in the four administrations. Many employers operate across the UK, and employers and apprentices alike will want to know that their investment has currency across the UK. These interests are best served by finding common ground wherever possible, and for apprenticeship policy in all nations of the UK to be developed with this principle in mind.

### **Progression and social mobility**

18 Research commissioned by QAA in 2017<sup>3</sup> found that the number of students studying for higher education awards below bachelor level has fallen steeply over the last 50 years. In England, Wales and Northern Ireland, bachelor's degrees are at level six on the qualifications framework. Sub-bachelor qualifications are therefore higher education programmes at levels 4 and 5 on the same framework. Researchers found that around one in seven higher education students in the UK are currently on a sub-bachelor programme, but described this level of provision as 'poorly understood and under-investigated'.

19 Good quality apprenticeships at higher levels could help to reverse this decline, offering opportunities for progression, and a route into higher education for people that may not have otherwise considered it. A number of higher education providers offer pathways for students through higher to degree apprenticeships, and the continuation and expansion of these will be dependent on any cross-sectoral regulatory arrangements not being overly burdensome and duplicative.

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<sup>3</sup> *Sub-bachelor Higher Education in the United Kingdom* (October 2017). Commissioned by QAA and conducted by the University of Sheffield's Centre for the Study of Higher Education. <http://www.qaa.ac.uk/en/Publications/Documents/Sub-bachelor-Higher-Education-in-the-United-Kingdom.pdf>