

**Analysis of Consultation
Responses: Changes to the
Mandatory Qualifications Criteria**

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1. Summary

There was strong support for the majority of our proposals.

There was very strong support for our proposals on:

- Qualifications being mandated where they fulfil a regulatory, professional body or labour market requirement.
- Introducing more specific evidence criteria.
- Specifying exactly which qualifications fulfil the mandate.
- Mandated qualifications being at the same or lower level than the apprenticeship.
- Where possible, qualifications should be integrated with the end-point assessment (EPA).
- Protecting the independence of the EPA, by introducing some minimum expectations for the setting, delivery and marking of integrated assessments.

While there were still high levels of support for the following proposals, responses were more mixed:

- Not mandating qualifications solely because they provide structure to off-the-job training, or add depth and breadth to the apprenticeship.
- Mandated qualifications aligning with, and not going further than the knowledge, skills and behaviours (KSBs) set out in the occupational standard.
- One subset of the KSBs only should be identified for assessment by the integrated qualification, and this subset cannot be assessed by multiple smaller qualifications.

We also included some questions which were open-ended and asked for respondents to provide comments on an issue.

2. Background

Learning from the last few years of apprenticeship delivery, we think there is room for improvement in how qualifications are used and operate within apprenticeships.

We proposed changes to the requirements that we use when deciding whether an apprenticeship should include a mandatory qualification (a qualification which is mandated in the occupational standard, to be completed by an apprentice as part of

their apprenticeship). In updating our criteria, we look to strengthen and make clearer our expectations for the suitability of a qualification, to ensure that only those which are truly necessary and deliver for apprentices and employers are included.

We also presented proposals to integrate a mandated qualification's assessments with the apprenticeship end-point assessment. This is an approach we have been piloting with great success, and now look to roll out across other mandated qualifications.

3. Approach to analysis

The consultation included 24 questions and was published on our website. Respondents could respond using an online form, by email, or by posting their responses to us.

Respondents to this consultation were self-selecting so while we tried to ensure that as many respondents as possible had the opportunity to reply, the sample of those who chose to do so cannot be considered as representative of any group.

We present the responses to the consultation questions in the order in which they were asked. For each of the questions, we presented our proposals and then asked respondents to indicate agreement using a scale and provide a comment. Respondents did not have to answer all of the questions.

Some respondents provided very specific examples which we have chosen not to include to ensure confidentiality. However, the underlying issues or themes which have been raised have been captured. Due to the high volume of comments we have grouped responses in a thematic or summarised way.

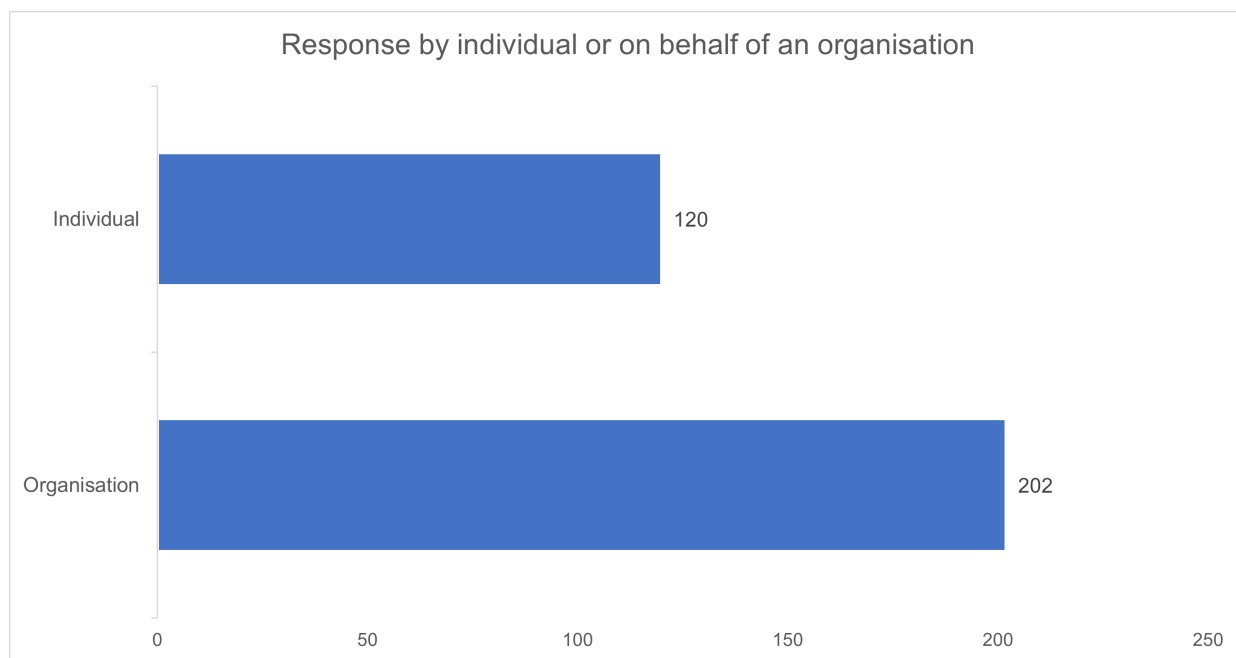
In some instances, respondents answered a question with comments that did not relate to that question. Where this is the case, we have reported those responses against the questions to which the response relates where possible, rather than the questions against which it was provided.

We have included a bar chart for each question that shows the percentage of respondents that selected each type of response. Each chart shows the total levels of agreement across all respondent types, before separating the respondents into individuals and organisations. The table below each graph shows the percentage of respondents that selected each response on the Likert scale. It again breaks this down further into individual and organisation responses. All percentages have been rounded to whole numbers and therefore may not add up to 100%.

4. Who responded?

Our [consultation on proposed changes to the mandatory qualifications criteria](#) was open between 15 December 2022 and 17 February 2023.

We received 322 written responses to our consultation that used the online survey platform. A further six respondents provided responses via email to our consultation mailbox. These responses did not always fully align with the questions set out in the consultation, however we have reviewed each of these responses as part of our analysis and included the issues they raised against the most relevant questions.



Response breakdown	Totals
Individual	120
Organisation	202



Response breakdown	Totals
Apprentice	10
Awarding body	14
Education or training provider	77
Employer	79
End-point assessment organisation	34
Industry group	12
Other	22
Other representative or interest group	15
Professional body	19
Tutors, assessment staff and other representatives from apprenticeship and training providers	40

In addition, we held six consultation events with 185 attendees consisting of employers, trailblazers, route panel members, awarding organisations, end-point assessment organisations (EPAOs), training providers and our apprentice panel. We have considered the feedback and comments gathered during these events and where appropriate, reported it against the questions to which the feedback relates.

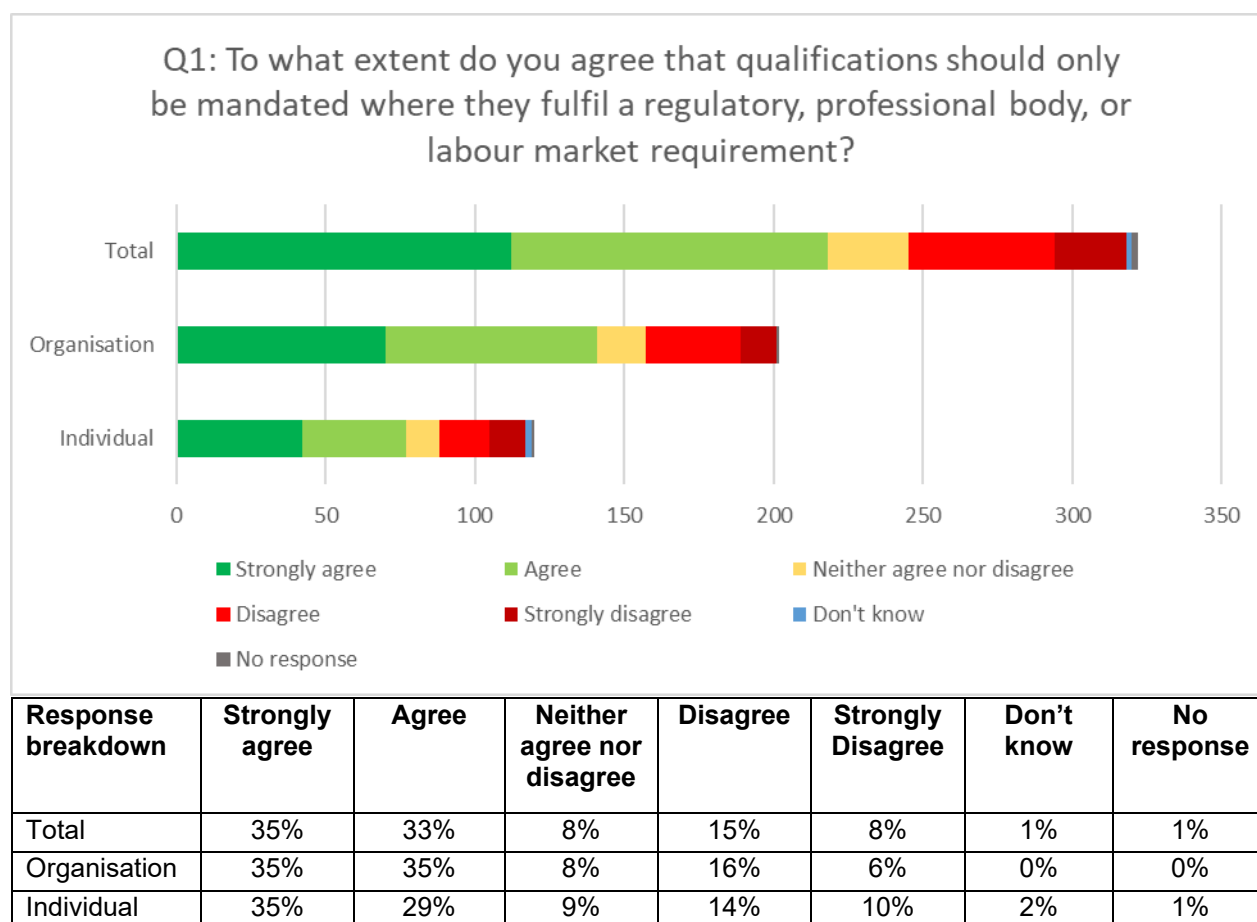
All respondents were based in England.

A further breakdown of respondent category data can be found in [Annex A](#).

5. Detailed analysis

In this section we report the views of respondents to the consultation in broad terms. We list the organisations who responded to the consultation and who were happy for us to document their engagement in [Annex A](#).

Question 1: To what extent do you agree that qualifications should only be mandated where they fulfil a regulatory, professional body, or labour market requirement?



Comments made by respondents who agreed or strongly agreed with our proposal (68% of respondents)

The majority of respondents either agreed or strongly agreed with our proposal. Many described an ultimate desire to only have qualifications in apprenticeships where they are truly necessary, with some noting that the proposed three reasons for mandating would cover all essential qualifications. Respondents felt that apprenticeships should carry as much currency as qualifications, but some noted that until that happens

qualifications should continue to be mandated where they fulfil a regulatory, professional body or labour market requirement.

Respondents supported our ambition to ensure that the criteria is clearer and consistently applied, noting that the inclusion of qualifications that do not fulfil the proposed criteria risk undermining the apprenticeship brand. One respondent noted that the language used in the consultation is much clearer than the current criteria.

Respondents who agreed with this question also noted the benefits of qualifications. They felt for example that in some occupations, they help to maintain the status of apprenticeships, demonstrate an apprentice's achievement (including where the apprenticeship itself is not completed), and support progression to high-paying and meaningful careers. Respondents also noted the rigour and consistency that qualifications can provide to off-the-job training delivery.

Some respondents provided examples of the currency of qualifications in their particular industries, while others noted the negative impact unnecessary qualifications can have on recruiting and retaining apprentices. A small number of responses appeared to suggest that all apprenticeships should include a qualification.

A number of respondents who agreed with our proposal noted the need for robust and fully representative evidence to support labour market requirements, considering the full range of employers and differences in local skills needs. One respondent noted that labour market requirements need to be broad enough to allow evidence of progression across occupations, where another noted that this was a good opportunity to challenge the labour market's reliance on particular qualifications. Other respondents observed the need to be mindful of, and react to changes in the labour market as recruitment needs change and evolve over time.

Some respondents noted the importance of considering a number of outcomes when reviewing proposed qualifications to mandate. These included ensuring that the qualification is weighted appropriately and is recognised as a key requirement for a role regardless of the criterion under which it is mandated, and to minimise the risk of monopolistic situations.

Several respondents who agreed with this question noted that they were unsure which category would allow some health and safety qualifications to be mandated (in reference to a particular industry or occupation), with some respondents setting out detailed responses relating to their field.

One respondent who agreed with our proposal felt that rather than potentially restrict the types of qualifications which can be mandated, the key was to retain choice but link the qualification award to the EPA. Another respondent noted the importance of flexibility and the employer or apprentice choice in which qualification is taken.

Comments made by respondents who disagreed or strongly disagreed with our proposal (23% of respondents)

Many of the respondents who disagreed or strongly disagreed thought that while our proposed criteria were correct, they didn't go far enough. As with those who agreed with our proposals, many thought that progression to further study and progression within or between careers should be considered a reason to mandate a qualification, particularly where they might lead to a degree or degree apprenticeship.

A couple of respondents noted that apprenticeships should continue to use qualifications until parity with academic routes was achieved, including apprenticeships carrying UCAS points. One respondent noted that qualifications can serve to attract talent to apprenticeships, and a small number of respondents noted the international currency and recognition of qualifications.

As with those who agreed with our proposals, respondents who disagreed or strongly disagreed felt that qualifications should not be included in apprenticeships at all. Respondents noted the importance of raising the currency of apprenticeships so that they are regarded equally with qualifications, with many suggesting that the apprenticeship should fulfil any labour market need in its own right.

In contrast, others who disagreed thought that apprenticeships should always include qualifications. Some respondents noted that currently qualifications have the greater currency, and improve the credibility and portability of the apprenticeship. Some felt that qualifications improve the quality of the apprenticeship by:

- Providing structure for the delivery and quality of off-the-job training to improve the learner experience. One respondent suggested that qualifications secure better outcomes for apprentices, while another noted that a qualification can help apprentices better prepare for their EPA.
- Providing evidence of achievement where an apprentice does not complete their apprenticeship.
- Providing assurance for employers that the apprenticeship has delivered the required underpinning knowledge and skills.
- Adding clarity and detail to the way the KSBs are articulated in the occupational standards. Respondents noted that in some standards the KSBs lacked the detail that regulators, professional bodies and employers need to be confident that apprentices had acquired essential knowledge and in these instances, qualifications were relied upon as evidence.

These views were also shared by those who agreed or strongly agreed with our proposals.

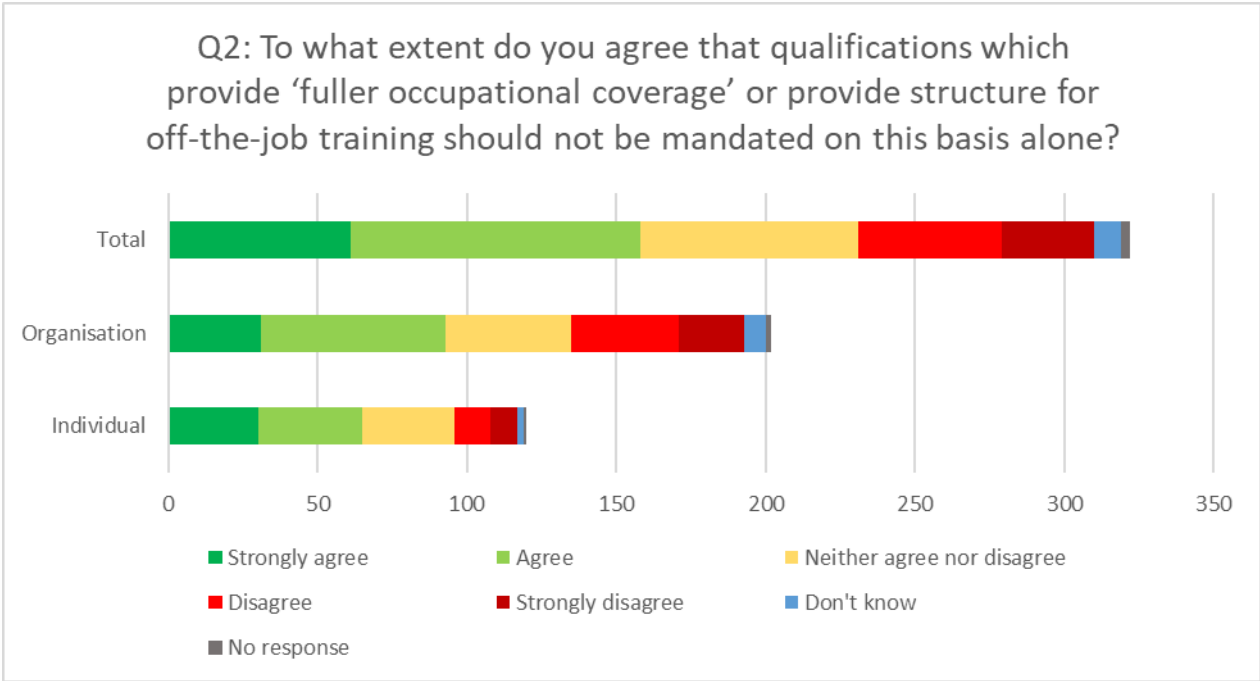
Some respondents sought assurance about how the criteria would be applied before they could agree with our proposals. Others went further, to suggest that the inclusion of a qualification under this criterion should be solely at the discretion of employers, through the trailblazer group.

A number of respondents referenced professional bodies in particular. Some felt that professional bodies should see apprenticeships as important and explain why additional qualifications are needed and why the apprenticeship does not satisfy membership requirements. Others expressed concern that any removal of qualifications required by professional bodies may lead to the relaxation of professional registration requirements.

Comments made by respondents who neither agreed nor disagreed with our proposal (8% of respondents)

Those who neither agreed nor disagreed made many of the same points captured above. In addition, one respondent noted that the current use of mandated qualifications is confusing as many do not align with the KSBs of the standard, and some respondents noted the importance of including wording which supported legislative requirements together with regulatory.

Question 2: To what extent do you agree that qualifications which provide ‘fuller occupational coverage’ or provide structure for off-the-job training should not be mandated on this basis alone?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	19%	30%	23%	15%	10%	3%	1%
Organisation	15%	31%	21%	18%	11%	3%	1%
Individual	25%	29%	26%	10%	7%	2%	1%

Comments made by respondents who agreed or strongly agreed with our proposal (49% of respondents)

Many respondents who agreed or strongly agreed with this question commented on how the occupational standard itself should provide the necessary occupational coverage, competence, and structure to off-the-job training.

Whilst many respondents agreed that qualifications should not be mandated on the basis of providing 'fuller occupational coverage' or structure to off-the-job training alone, some felt that these elements may unintentionally be a result of decisions to mandate a qualification anyway (e.g., a regulatory body qualification may provide 'fuller occupational coverage'). For example, a few respondents felt that there should be some flexibility where existing high-quality qualifications recommended by professional bodies add value and consistency to the teaching and learning on the apprenticeship and provide 'fuller occupational coverage'.

A number of respondents felt that the KSBs should provide adequate occupational coverage on their own when developed comprehensively and correctly, with some commenting that if qualification is needed to establish further occupational coverage then the standard has not been correctly devised to cover the KSBs required by the sector for the role. They suggested the standard would need to be expanded to cover the KSBs which would involve redrafting to strengthen and demonstrate occupational coverage. One respondent suggested the idea of developing optional KSBs that are not deemed essential for the role but would add flexibility to the occupational standards without the need to mandate additional qualifications.

Whilst one respondent agreed that KSBs should provide full occupational coverage, they felt the KSBs may need to be evolved faster than the review cycle timeframe. They suggested this could be problematic for certain fast-paced sectors if there was no qualification to provide the flexibility.

A couple of comments suggested that where the qualification is needed for 'fuller occupational coverage' or structure for off-the-job training, then it should be offered as an additional extra agreed between the employer and training provider. Some felt that removing mandated qualifications will open opportunities and flexibility for employers to choose other qualifications relevant to their needs. One respondent suggested that while certain qualifications are required for roles at the induction stage and are

mandated into employer operating procedures, these do not necessarily need to be mandated in an apprenticeship.

A few respondents who agreed or strongly agreed with this proposal felt that off-the-job training set against the KSBs and EPA requirements (rather than the qualification) would allow a more structured approach, and give confidence to apprentices and employers before moving through gateway.

Some comments suggested that providers may be disadvantaged without the qualification to structure the curriculum, which may lead to inconsistent approaches to design, delivery, and costs, which would need clear guidance and support. Some respondents argued the opposite, and commented that the occupation's standard itself gives providers flexibility on how they design and deliver the apprenticeship curriculum in a way that is best suited for the apprentice and employer needs.

A couple of respondents agreed that a qualification should not be mandated for these purposes alone, but acknowledged that having a broader and more in-depth knowledge of a sector is not a disadvantage, especially for small and medium enterprises (SMEs).

In regard to qualification reform, a small number of respondents noted the existing pressures on the market and the potential that there may be established and recognised qualifications already approved for funding that may cover more than the KSBs of the occupational standard. Disregarding these types of qualifications only on the basis of the fact they offer 'fuller occupational coverage' may mean apprentices are disadvantaged if no other qualification is available instead.

A couple of respondents felt there would need to be a degree of flexibility in the decision-making process since not all sectors needs are the same, with one respondent suggesting the need for a broader range of stakeholders to be involved in trailblazer groups to support KSB development and mapping decisions.

Respondents commented on how these proposals would rectify some of the current issues with qualifications which are mandated on the basis of 'fuller occupational coverage' or structure for off-the-job training alone. They included:

- Sometimes the qualification can add superfluous content which is not relevant to the apprentices' actual role.
- The qualification can detract from the EPA and cause confusion for employers and apprentices.
- Once the qualification is passed, employers and apprentices don't understand the need for the EPA.
- Some of the qualifications do not align with the knowledge needed.

- Qualifications are being used to drive the uptake of apprenticeships.
- Qualifications are being used by employers as an incentive to support recruitment.

Some respondents made other comments which were not pertinent to the question, which have been captured in the analysis of more appropriate questions.

Comments made by respondents who disagreed or strongly disagreed with our proposal (25% of respondents)

While response to the scale indicated disagreement, some comments appeared to signal agreement with our proposal, and some respondents felt the question was unclear or confusing.

Many respondents that selected disagree or strongly disagree made comments related to the benefits of qualifications in apprenticeships, and the value they bring to all stakeholders. These comments were mainly stated from the perspective that removing qualifications from apprenticeships, or not allowing mandated qualifications that support 'fuller occupational coverage' or structure off-the-job training would have a negative impact. The key themes of these comments included:

- Qualifications complement all aspects of apprenticeship delivery.
- Qualifications provide structure for off-the-job training and support curriculum planning, enabling a fair and equitable approach to training provision.
- Qualifications support key milestones and provide competency, evidence and achievement throughout the apprenticeship, ultimately supporting EPA.
- Qualifications are a key part of the reason why learners take on apprenticeships.
- Qualifications provide a breadth of knowledge that apprenticeship KSBs don't.
- Qualifications enable apprentices to develop transferable knowledge and skills.
- Qualifications support apprentice development, progression and career opportunities.
- Qualifications bring valuable credits which can be transferred if the apprentice moves role or location during their programme.
- Qualifications better support rapidly changing labour market needs.
- Qualifications help employers understand the learning and support on-the-job practice.

- Employers value qualifications and expect the underpinning knowledge which is not always included in the occupational standard.
- Qualifications can contribute to meeting certain site safety or licence conditions.
- Qualifications create parity of esteem and reduce the gap between academia and technical education.
- Some qualifications have a long history and are fundamental in their sector.

Many respondents who disagreed or strongly disagreed with this question felt that overall, any qualification should broadly align with the occupational standard. However, many respondents also showed support for qualifications that provide ‘fuller occupational coverage’ in apprenticeships.

In support of this, a few respondents felt that occupational standards have limited detail on what should be taught and assessed, and that standards are purposefully structured in a broad way. They felt that qualifications can expand on the detail and better articulate what the content of knowledge should be, which employers and training providers appreciate for a number of reasons.

Some respondents noted that if no mandated qualification is included in the apprenticeship, the KSBs will need to be more detailed and extensive to ensure they are on parity with qualifications of the same level. Otherwise, the occupation would suffer from varied levels of knowledge and learning.

Several respondents noted that it is usual for professional qualifications to have ‘fuller occupational coverage’ that extends beyond the apprenticeship KSBs for a specific role, and that this helps the apprentice develop a broad understanding and professional competency which is deemed essential for professional practice.

Other comments in support of mandating qualifications for ‘fuller occupational coverage’ included:

- More and more employers need highly competent staff who can work across many disciplines as part of their role.
- Narrowing the apprentice’s development opportunities will limit their future employment prospects and social mobility.
- Current apprenticeship KSBs do not reflect a dynamic workforce that is continuing to innovate and change.

A few respondents noted the trailblazer and employer role in this process and suggested that we should not second guess trailblazer expertise and decisions on the appropriate training provision required for the occupation. They felt there should be scope to mandate whatever qualification is deemed necessary. A small number of

comments suggested the criteria must be reflective of the need in certain sectors or for international reasons, where employees may need to demonstrate their formal qualifications in order to practice.

A few comments suggested that it would be useful for trailblazers to signpost additional qualifications which are not mandated into the apprenticeship but will add value to the occupation, so that employers may consider this in their own specific context. Although one respondent suggested that this may lead to some employers optionally enrolling an apprentice onto courses to add 'fuller occupational coverage', which could disadvantage some apprentices who do not have the same opportunity.

Some comments were pertinent to other questions within the consultation which have been captured in the analysis of more appropriate questions.

Comments made by respondents who neither agreed nor disagreed with our proposal (23% of respondents)

Respondents that neither agreed or disagreed with the proposal to not allow qualifications to solely be mandated on the basis of 'fuller occupational coverage' or structure to off-the-job training alone, in the whole, made comments which have already been articulated in the above responses.

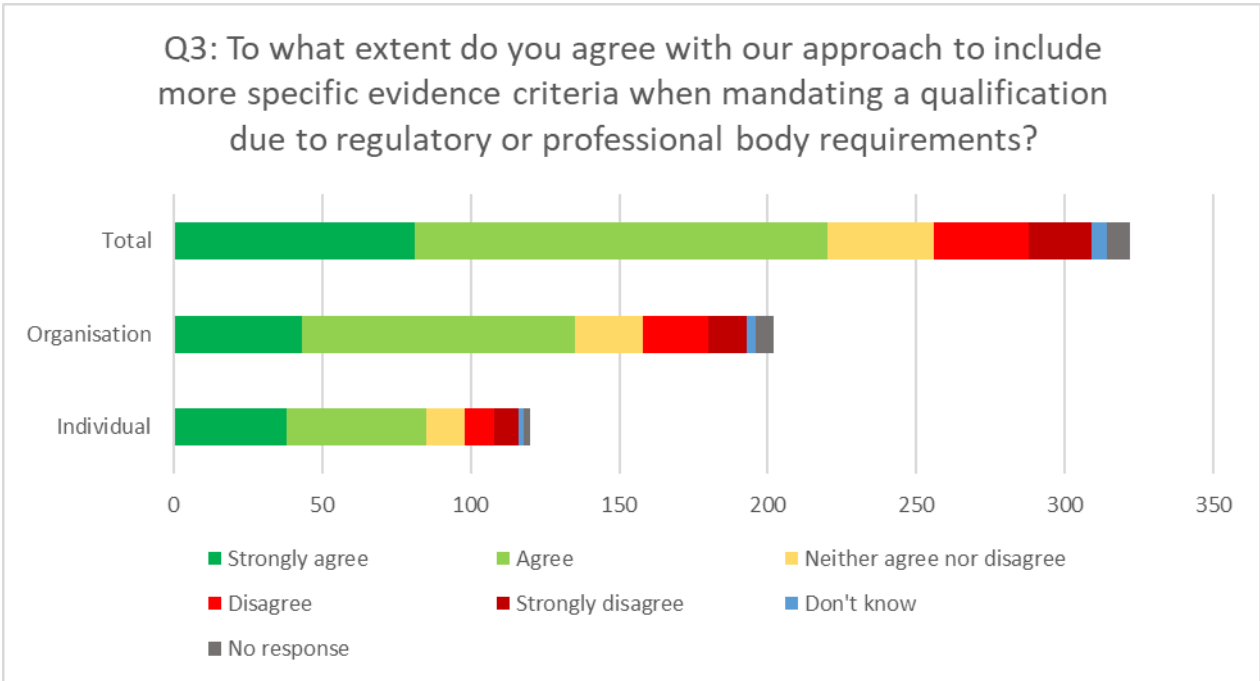
Overall, amongst the respondents there was a general support for allowing the mandating of a qualification for 'fuller occupational coverage', but not for the sole reason to provide structure to off-the-job training.

A few respondents suggested that the decision to mandate should be made on a case-by-case basis, allowing for those standards with an absence of 'depth' in the KSBs to mandate a qualification with 'fuller occupational coverage' that supports the industry need, or an apprentice's progression and career opportunities.

In addition, some comments noted the need to include all stakeholders (including experts that facilitate learning) in the decision-making process to ensure mandatory qualifications meet the needs of the current and future workforce.

Some comments noted that the current standards are not fulfilling their purpose, and that instead of mandating a qualification to ensure 'fuller occupational coverage', the standards should be revised accordingly.

Question 3: To what extent do you agree with our approach to include more specific evidence criteria when mandating a qualification due to regulatory or professional body requirements?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	25%	43%	11%	10%	7%	2%	2%
Organisation	21%	46%	11%	11%	6%	1%	3%
Individual	32%	39%	11%	8%	7%	2%	2%

Comments made by respondents who agreed or strongly agreed with our proposal (68% of respondents)

The majority of respondents either agreed or strongly agreed with this question. Most of the respondents showed overwhelming support for our approach to include more specific evidence criteria when mandating a qualification.

Many respondents felt that the criteria set out appeared reasonable and appropriate, and welcomed the greater transparency and clarity that the proposed approach offered. Respondents felt that robust evidence (that is relevant to the apprenticeship) should be easy to provide, with some noting the importance of the type and source of evidence being clear, consistent, and again transparent to ensure that the decision-making process is not only fair but also objective. Some felt that clarity is also key to ensure apprentices can take the next step in their career.

A small number of respondents who agreed with the approach identified that there will need to be clear guidelines for the type of evidence required, and assurances that the

evidence submission and review process is not overly complicated.

Several respondents suggested that if a qualification is deemed necessary, specific evidence must be provided to justify the decision including the necessity of professional body registration (at the appropriate level) when entering a given occupation. In addition, many respondents acknowledged that including more specific criteria when mandating qualifications will result in a higher-level of scrutiny to ensure the mandated qualification meets the requirements of professional standards and employer needs, as well as clear alignment to the requirements of the KSBs.

Many respondents also felt that to ensure the supporting evidence provided is accurate, trailblazer groups will need to ensure they have full participation from training providers. Respondents also noted that good communication between trailblazers and stakeholders will be key to this approach being effective.

One respondent noted that although the criteria talks about 'entering' the profession, we need to recognise and consider that there may be a time when an apprentice is already in the profession but needs the professional body recognition for progression.

Comments made by respondents who disagreed or strongly disagreed with our proposal (17% of respondents)

Many of the respondents who disagreed or strongly disagreed with this question generally felt that the proposal does not support apprentices, or trust the judgement made by employers and their representatives who have spent significant time developing the occupational standards.

A small number of respondents commented that employers are at the heart of designing and developing occupational standards and that this proposal risks putting more barriers in the way of trailblazer groups, which in turn could discourage them from wider consideration and actively engaging with sectors to determine needs.

Other respondents who disagreed felt that occupational standards had already been set to a high enough standard by existing regulatory and approval processes by a variety of bodies such as ESFA, Ofqual, and external quality assurance (EQA).

A number of respondents felt that this approach could hinder the overall experience of the apprenticeship, as the policy change could mean that the apprentice becomes disadvantaged in the labour market which will ultimately stunt their social mobility moving forward.

A couple of respondents noted that if this type of approach is taken, there needs to be greater acknowledgement and risk mitigation of how professional bodies behave when presented with this type of favourable situation when they have their own commercial qualifications or offers. They felt that professional bodies need to work to the structure

and timelines of the apprenticeship programme.

A few respondents noted that the proposal would make the whole process much harder than it needs to be and may act as a barrier that is likely to put off new entrants.

Some comments were pertinent to other questions within the consultation which have been captured in the analysis of more appropriate questions.

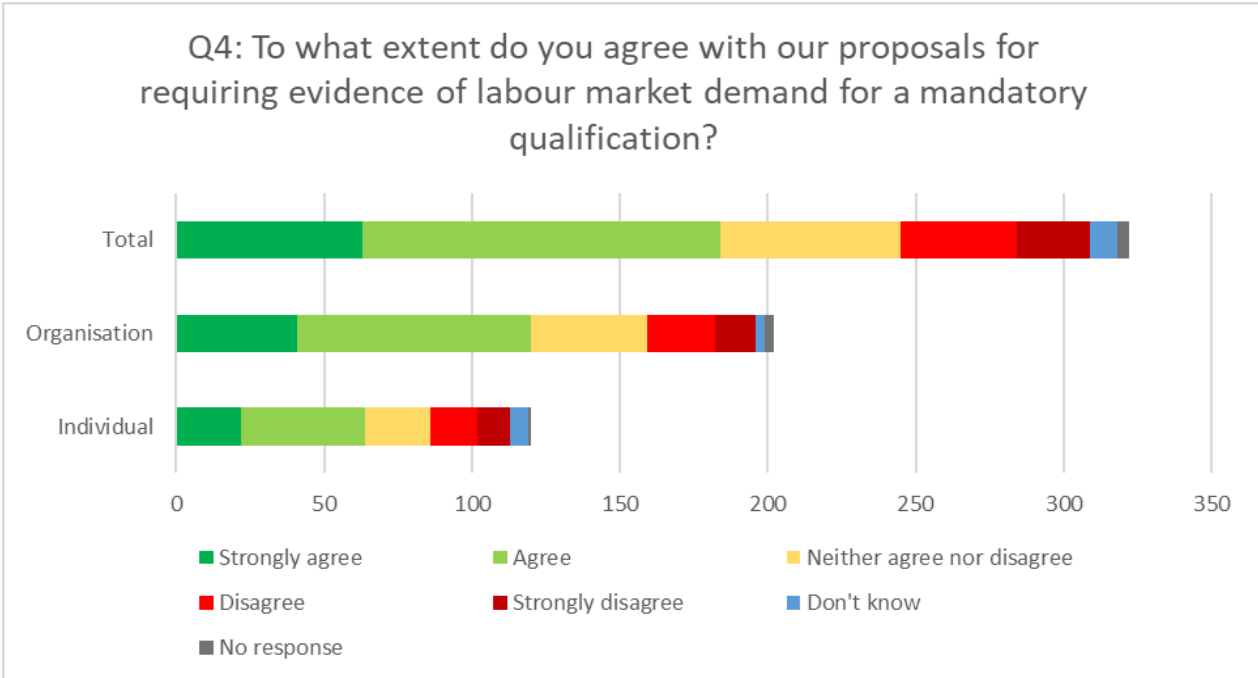
Comments made by respondents who neither agreed nor disagreed with our proposal (11% of respondents)

Overall respondents that neither agreed nor disagreed provided comments which were similar to many of the points already mentioned above, with a general agreement that the proposal could be a positive one if there is consideration for some of the potential issues as a result of the changes.

One respondent felt that the approach could create an unfair market, and lead to monopoly issues without appropriate tendering or procurement processes in place. They also suggested that due to the inevitable conflict of interest, there should be tight controls on professional bodies to ensure they demonstrate that their qualification and professional body status are a genuine requirement. Ultimately they felt that this could create an unfair market advantage for professional body EPAOs, and risk undermining the integrity of independent choice for EPA.

Another respondent highlighted that there is a case for qualifications to be included in all apprenticeships where there is demand from employers and recognition in the sector, and not just those with regulatory, professional body or labour market requirements. They also suggested that IfATE should consider the industry's definition of a 'professional body'.

Question 4: To what extent do you agree with our proposals for requiring evidence of labour market demand for a mandatory qualification? We have made some suggestions of the kinds of evidence we would expect to see submitted – in your response, we would be interested to hear of other sources of evidence which could be used to evidence employer demand.



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	20%	38%	19%	12%	8%	3%	1%
Organisation	20%	39%	19%	11%	7%	1%	1%
Individual	18%	35%	18%	13%	9%	5%	1%

Comments made by respondents who agreed or strongly agreed with our proposal (58% of respondents)

The majority of respondents either agreed or significantly agreed with this question. Most of the respondents showed support for our approach to requiring evidence of labour market demand for a mandatory qualification, however there was a general theme of the need for greater clarification surrounding the process.

Some respondents commented on other sources of evidence which could be used to evidence employer demand. They included:

- CVs of people who are currently in the role. For example, looking at

qualifications held by the current workforce and not limited to job adverts.

- National Careers Service and other trusted sources of information, advice and guidance (IAG) about the occupation.
- Testimony from industry specialist recruiters about the willingness of employers to consider candidates with or without certain qualifications and the suitability of those candidates.
- Whether a qualification is required for the apprentice to progress into higher education. For example, if an apprentice undertakes an accountancy apprenticeship at level 3 but does not complete the qualification as it is not mandated, it is unclear as to whether the apprenticeship alone provides the learner with the required 'credits' to move onto a university degree.
- Sectoral evidence wider than the trailblazer to ensure a national voice has been heard.
- Evidence for factors where the evidence base is emerging rather than established. For example, technology impacts.
- Evidence that the inclusion of a qualification could open access to an occupation and support progression for diverse or under-represented groups or would help to professionalise the occupation.
- Where a regulator is present, evidence should be provided by the regulator directly rather than the employer group.
- A more diverse range of evidence demonstrating endorsement from the industry.

A number of respondents suggested that if a qualification is deemed necessary, then there should be unequivocal evidence about the validity of the qualification in the market or industry. However, some felt it is key that significantly more employers are involved in the evidence acquisition than the numbers currently involved with trailblazers.

Many respondents felt that the approach set by IfATE appeared reasonable and appropriate, and that it should introduce a more rounded assessment of the necessity for a qualification due to a labour market need. Respondents also noted that the clarity is also important, as a mandated qualification can add cost and complexity to an apprenticeship and therefore it must be justified to maintain employer and public confidence in apprenticeships.

A number of respondents identified that despite agreeing with the approach to introduce a more rounded assessment of the necessity for a qualification, IfATE needs to recognise that this does create challenges in prescribing the evidence. They felt that

as a result it is important to ensure that bureaucratic requirements for employers are kept to a minimum as the process could become too onerous.

Respondents also felt that it is important for IfATE to be flexible, particularly to accommodate niche occupations or where the employer base may be disproportionately dominated by SMEs.

A small number of respondents felt that although they agree with the approach, there needs to be some flexibility with how evidence can be presented. They felt for example, that if a license or qualification is needed to complete certain tasks within the apprenticeship then it should not matter whether it's evidenced within the labour market because the apprentice will still need this to do their job.

One respondent noted that IfATE needs to ensure that the evidence provided reflects a range of employers. They noted that often larger employers have the stronger voices at trailblazer groups, and that smaller employers are unable to engage in this process and may not respond to employer consultations due to barriers to engagement.

Comments made by respondents who disagreed or strongly disagreed with our proposal (20% of respondents)

Many of the respondents who disagreed or strongly disagreed with this question generally felt that the policy change could become too bureaucratic and onerous for trailblazer groups to manage. They felt it would become an unnecessary use of their time and resources and likely to cause employers to disengage from the process as a whole, damaging apprenticeship uptake.

A small number of respondents noted that the proposal doesn't take into account that analysis of the labour market is difficult due to its ever-changing nature. As a result of this, respondents felt that evidence will be difficult to gather and when available may not be specific enough to meet threshold requirements.

Respondents suggested that any evidence required for mandating qualifications based on labour market demand must be flexible to meet the needs of all sectors and industries. They felt that some sectors may not be able to provide factual evidence of a labour market demand, but they will have the industry experience of working in a sector to understand that a qualification supports the development and progression of apprentices in their careers.

Others who disagreed thought that an approach where the employer's contribution to a trailblazer group is seen as a trusted source of intelligence (regarding the sector and market they operate in) would be more effective.

A few respondents noted that some sectors span the international market where qualifications are more widely recognised than apprenticeships. Where this is the case, they believe that this should be a key indicator for inclusion of a qualification based on

labour market demands. The respondents felt that this would encourage a sensible conversation with employers about the positive inclusion of qualifications and the benefits they can bring, rather than ruling them out.

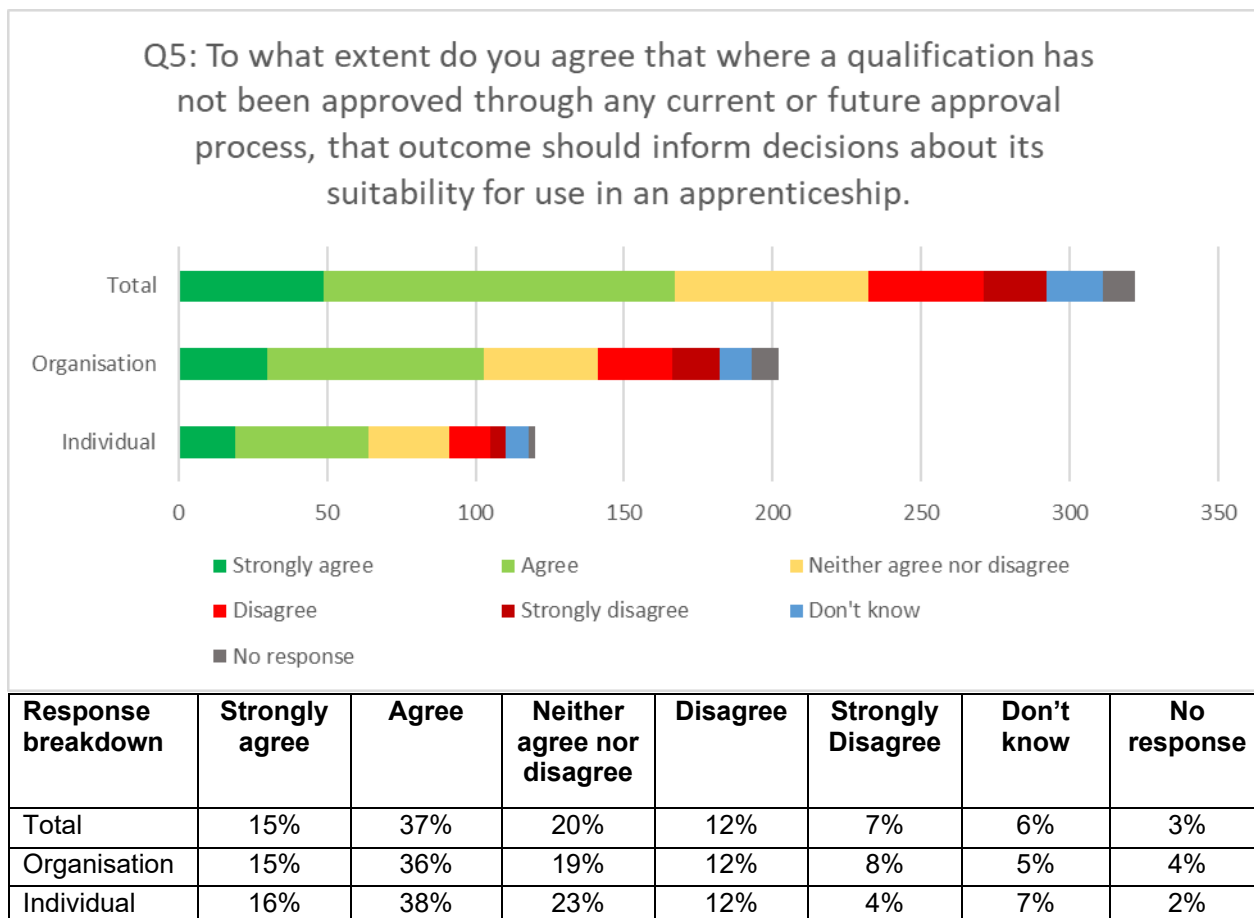
Comments made by respondents who neither agreed nor disagreed with our proposal (19% of respondents)

Overall responses to this question were similar to many of the points already mentioned above, with a general agreement that the proposal could be a positive one. However comments suggested that if this proposal is to be adopted it needs to be flexible in its approach.

One respondent highlighted that labour market demand can be challenging to measure, and there is the danger that the proposal could create an unintended barrier if actual demand cannot be evidenced in a prescribed manner. They suggested it is important for IfATE to consider any additional burden on employers and awarding organisations in assessing the impact of this proposal.

A number of respondents also noted that this approach might only take into consideration current labour market information and not any unknown future need and labour transferability opportunities. One respondent believed as a result, a broader evidential definition of potential employment would be a better solution in that case.

Question 5: To what extent do you agree that where a qualification has not been approved through any current or future approval process, that outcome should inform decisions about its suitability for use in an apprenticeship.



Comments made by respondents who agreed or strongly agreed with our proposal (52% of respondents)

Just over half of all respondents either agreed or strongly agreed with this question, with some suggesting that for qualifications which have not been approved through any other formal process, there would need to be a fair, clear and consistent approach to ensure they can still be mandated where the need is evidenced.

Many respondents felt that any qualification should only be mandated into an apprenticeship if it is approved and regulated by the relevant body. They felt this would ensure oversight and maintain the integrity and reputation of the apprenticeship system to prevent misuse of qualifications. Respondents also suggested that this will ensure we only use high-quality qualifications which are aligned with employer needs to benefit all stakeholders.

A few respondents who agreed with this question also felt that if a qualification has not been previously approved, there would need to be sufficient flexibility in the decision-making process if there is evidence to suggest employer demand, and also to consider sectoral and regional needs.

Many respondents who either agreed or strongly agreed outlined the need for clarity and transparency in the approvals process to ensure roles and responsibilities are clear.

Some felt that where qualifications have been previously approved for other technical education programmes that this is seen in an advisory form only, and that the decision to mandate a qualification for an apprenticeship is taken on the merits of that situation specifically.

Some comments suggested the benefits of the approach outlined for this question. A summary of the benefits include:

- Maintaining employer confidence in apprenticeships.
- Ensuring consistent provision from training providers.
- Guaranteeing the correct qualification is being used.
- Removal of out-of-date or legacy qualifications.
- Avoiding duplication of the employer evidence process.

Some respondents who agreed with the concept of using previous approvals processes to inform the suitability of a mandated qualification in an apprenticeship, also noted these points for consideration:

- Careful decision-making process and communications are needed to ensure qualifications are not devalued.
- Ensuring processes are joined-up with other reforms and approval changes in the sector.
- Consideration of new industries and the future needs of the labour market.
- Periodical review to include decisions on approval of mandatory qualifications.
- Inclusion of wider stakeholders in the decision, including training providers and professional bodies.

Comments made by respondents who disagreed or strongly disagreed with our proposal (19% of respondents)

Several respondents who either disagreed or strongly disagreed with this question made comments similar to those noted above, relating to the need for qualifications which have not been through any prior approvals to still be included in the apprenticeship where justified.

Some felt that since approvals processes are designed for specific purposes, each instance of approval should be considered on the merits of that particular circumstance (especially as qualifications evolve and change all the time).

Many respondents expressed concerns that this proposal is too restrictive and would negatively impact apprentices, since many high-quality qualifications that meet employer, professional or regulatory needs will not necessarily be approved for delivery as part of any other technical education programme. They felt this proposal would exclude necessary and useful qualifications that are required by employers, and risk both current and future availability of qualifications in apprenticeships.

In regard to Higher Technical Qualifications (HTQs) a number of respondents felt that if a qualification is not approved as a HTQ it should not be branded as 'low quality', since many qualifications exist outside of this fundable framework in specific fields and are still really important for the sector and apprentices alike.

A few respondents felt that the question is not clear in terms of what is being proposed, and that there was insufficient information to respond appropriately. With some comments referencing confusion over who would be approving qualifications in this proposal, with a couple of respondents questioning the role of IfATE in approving qualifications.

Some respondents felt that since qualifications already go through an approvals process by the awarding organisation and then by Ofqual, there is no need for a further process. A couple of comments noted that professional bodies also have external accreditations in place which are recognised and quality assured via different routes.

A small number of comments highlighted the employer role in the process, and suggested that the trailblazer groups are appropriate decision-makers in determining the use of qualifications in apprenticeships. One respondent suggested that processes for each different sector is required to meet the changing needs of the workforce and employer priorities.

Comments made by respondents who didn't know, or neither agreed nor disagreed with our proposal (26% of respondents)

Many respondents made comments aligned with those already summarised above. Respondents again outlined the need for an approvals process which considers the merit of the qualification in relation to the apprenticeship need, and not just because it has been previously approved for other technical education programmes. Concerns highlighted that such an approach would restrict the system and prevent non-approved but employer-valued qualifications, from being used in apprenticeships.

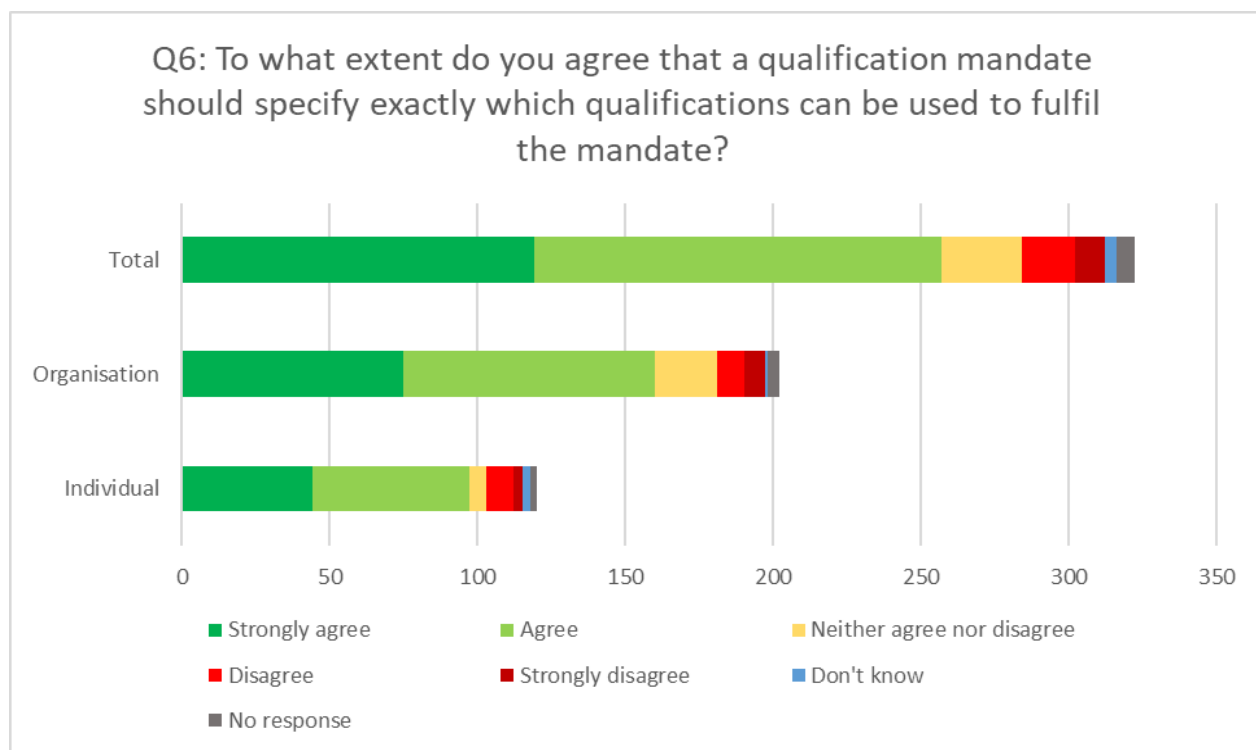
A few comments suggested that the only approval needed was from the trailblazer group, and one respondent suggested apprentice progression and success should be

at the forefront of decisions.

Some respondents felt they could not fully answer this question for the following reasons:

- Confusion over the question meaning.
- No clarity or context around what approval means.
- No clarity over who would be involved.
- The need to understand how this approach interacts with other reforms currently taking place in the education landscape.

Question 6: To what extent do you agree that a qualification mandate should specify exactly which qualifications can be used to fulfil the mandate?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	37%	43%	8%	6%	3%	1%	2%
Organisation	37%	42%	10%	4%	3%	1%	2%
Individual	37%	44%	5%	8%	3%	3%	2%

Comments made by respondents who agreed or strongly agreed with our proposal (80% of respondents)

A significant majority of respondents either agreed or strongly agreed with this question, and there was a general consensus that the use of exact qualification mandates in apprenticeships will be beneficial to all. Respondents felt that this would avoid confusion, reduce ambiguity, provide clarity, and create consistency for stakeholders.

Respondents also felt that clear mandates will support and enable apprentices to have consistent progression pathways into higher education and employment, and will create equal levels of competency at the end of the apprenticeship. They also felt it would be clearer for all stakeholders regarding what has been achieved during the apprenticeship.

Many respondents that agreed with the proposal had very strong views that the specific list should not be restricted to only one qualification, and that multiple and alternative options can and should be used within the same occupational standard. This would allow employers to choose the one most appropriate for their needs.

A number of respondents also identified this would be useful from a provider perspective, with one response suggesting this would ensure more standardisation across providers. Some comments suggested that these proposals will support training providers and EPAOs with providing clarity, and ensure courses are not chosen which do not deliver the required level of competence. However, one respondent advised caution over the potential for specific mandates to create a barrier to an apprentice achieving EPA due to any restrictions of the qualification.

Amongst those that agreed with the proposals, there were many comments raised about the process of deciding on the specified list of qualifications. Respondents made suggestions including:

- A clear and equal opportunity for awarding organisations to apply for their qualification to be included.
- Clarity on the roles and responsibilities in the decision-making process.
- Developing a process that is fair and inclusive.
- Enabling a process that ensures the quality of the qualifications.
- Communicating a rationale that is clear and transparent.
- Creating an approach which is future-proofed with flexibility built-in to consider sectoral context.

- Using an approach that manages any conflict of interest carefully.

A few respondents also referred to the trailblazer group in the decision-making process, and there were clear comments about the need for trailblazers to work with wider stakeholders to ensure sufficient knowledge about the national workforce, wider programme needs, and qualification diversity.

One respondent had the suggestion that the trailblazer group could also recommend qualifications that support the apprenticeship or occupation overall, as well as those which must be mandated. This would enable the learner or employer to choose additional qualifications as required when considering their own labour market and occupational needs.

In regard to the ongoing management and review of the specified mandated list, many respondents that agreed with the proposals also felt that quick action would be needed when qualifications are discontinued or updated due to regulatory requirements.

A number of respondents also felt that there would need to be clarity on the process for adding, updating or removing qualifications in the future to ensure employer needs are continuing to be met. Many respondents commented that this process should be possible without the need for a full review of the standard itself, although it may still carry its own administrative burden.

A few respondents considered professional or regulatory body requirements, and suggested that the occupational standard should refer to a list produced by the professional or regulatory body rather than including a specified list of qualifications in the occupational standard. They felt this would allow for future changes to be accommodated without the need to amend the standard, and for qualifications to be kept updated by the professional or regulatory body.

A number of comments reflected that both professional bodies and awarding organisations may update their qualifications in a different cycle to the occupational standard and assessment plan, therefore a process to update the specified qualification list must be developed.

There were specific and varied suggestions about the level of detail which should be included in the mandated list of qualifications. Some respondents were keen to have more detail (qualification codes, valid from and to dates, awarding organisations and specific titles), however others felt that just the title and level of qualification would be sufficient. A fairly equal number felt that by listing the awarding organisation it may create an unfair and non-competitive marketplace, and that there should be choice for the employer or apprentice.

Other respondents commented about the concern that restricting the mandate to a few awarding organisations may create a monopoly that could affect cost and quality in the

long term.

Comments made by respondents who disagreed or strongly disagreed with our proposal (9% of respondents)

Respondents that disagreed or strongly disagreed with the question shared some of the same concerns as those above. These included:

- The process for updating, adding or removing qualifications from a specified list.
- The potential of monopolies.
- Limiting the range of qualification options.
- Ensuring employer needs are met.
- The need for a clear and transparent process.

A small number of respondents commented that the proposed approach will negatively impact on the future flexibility of labour market needs, and therefore also negatively impact employer choice. A few respondents also reflected the potential of this proposal to negatively impact on sectors that are niche, or subject to change at pace (e.g., digital and technology).

Some respondents suggested that by limiting options of qualifications we are limiting apprentice progression opportunities, and one respondent had concerns that the qualification mandate may reduce the opportunity for breadth and depth in an apprenticeship, thus reducing the benefit to learners.

Comments made by respondents who neither agreed nor disagreed with our proposal (8% of respondents)

Overall respondents who neither agreed or disagreed generally felt that the use of a specified and approved list of qualifications is the right approach to minimise confusion, but one that might be difficult to implement in practice.

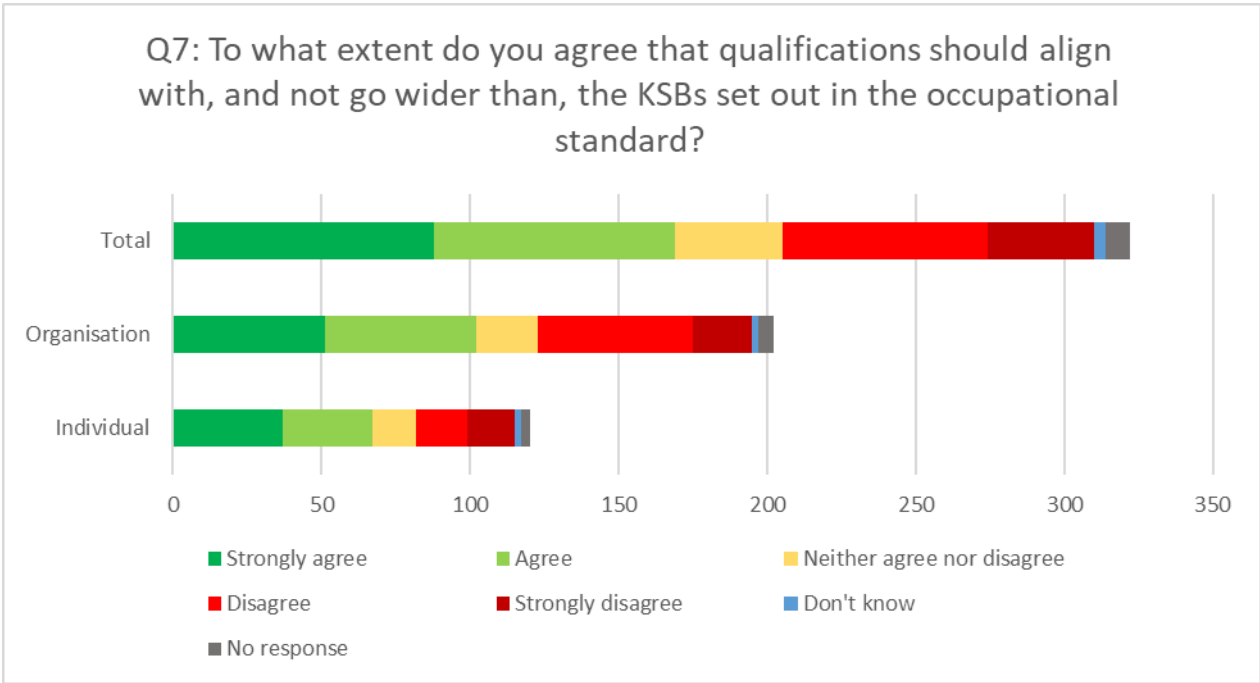
Again, a number of respondents suggested the need for a process that enables awarding organisations to apply for their qualification to be included in the mandate.

As previously mentioned, some comments acknowledged that the list would need to be regularly reviewed and kept up-to-date to ensure it meets industry needs, and that there should be a degree of flexibility and sector or industry specific considerations.

A small number of respondents were concerned that this approach might reduce the pool of qualifications available in the overall market, if some are ruled out which do not meet the criteria. A couple of respondents suggested that this may create an issue for apprenticeship frameworks across the devolved nations that rely on the existing qualifications in the market.

One respondent suggested that a list should be maintained separately to the assessment plan to ensure the assessment plan itself can be amended more quickly if needed. It should also be a responsive process to allow new entrants to the market to mitigate risks for innovation and competition.

Question 7: To what extent do you agree that qualifications should align with, and not go wider than, the KSBs set out in the occupational standard?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	27%	25%	11%	21%	11%	1%	2%
Organisation	25%	25%	10%	26%	10%	1%	2%
Individual	31%	25%	13%	14%	13%	2%	3%

Comments made by respondents who agreed or strongly agreed with our proposal (52% of respondents)

Just over half of the respondents either agreed or strongly agreed with the proposal that a qualification should align with, and not go wider than the apprenticeship’s KSBs. Respondents noted this especially where the sector has agreed the specific KSBs that are required for occupational competence, and where the standard must be entirely aligned with the regulator’s definition of competence.

A few respondents thought that this was already the case within their standards, and some commented that the need for alignment is already stipulated in the existing funding rules, but that stronger criteria will remove any confusion around eligible costs.

A number of respondents felt that consistency is key, and that if qualifications go wider than the occupational standard this would cause confusion in the sector and dilute the focus and value of the apprenticeship, especially when it comes to what will be assessed in the EPA.

A few respondents who either agreed or strongly agreed with this proposal felt that the qualification should clearly demonstrate how it aligns to the standard and assessment plan, ensuring it is relevant for the occupation. A small number of respondents felt that by aligning the KSBs it will prevent unnecessary burden and over assessment of the apprentice by ensuring that knowledge is assessed only once, either in the qualification's assessments or at EPA.

Some respondents felt this approach would benefit apprentices. They suggested it would reduce the risk of the apprentice not completing, it would ensure apprentices have the same competency at the end of their programme, and it would reduce over-assessment. With one respondent suggesting that where KSBs don't align between the qualification and the standard this can lead to two sets of evidence being required.

A number of respondents commented that alignment will ensure the qualification's learning outcomes and assessment requirements are relevant to the EPA, which could better support learners. In contrast, one respondent suggested that if the qualification covers all of the KSBs for the occupational standard that it negates the need for EPA altogether.

A few respondents commented on the coverage and quality of the apprenticeship KSBs and noted that if additional (but necessary) KSBs are identified in a mandatory qualification then the standard should be revised accordingly. One respondent commented that when the KSBs require a specific task to be completed a separate qualification may be needed to perform that task, and that if the KSBs for that qualification are not aligned to the occupational standard, then the standard may need to be updated to reflect this.

In comparison, some respondents acknowledged that if the mandated qualification's KSBs do not reflect the standard, then the qualification should be revised accordingly, with one respondent suggesting that awarding organisations should be encouraged to re-design their qualifications to mirror the KSBs exactly.

A few responses noted that the trailblazer group should be responsible as the employer voice to carry out a mapping exercise to ensure alignment, but that there does need to be some flexibility and consideration of the most appropriate fit for each occupation. A number of respondents also felt that the mapping and development of KSBs should be

informed by the sector and representatives of professional bodies and awarding organisations, who are better placed to support KSB alignment decisions.

In support of this proposal, one respondent suggested that qualifications that go wider than the apprenticeship could increase off-the-job requirements, and that there is a risk employers will not support more off-the-job training than is required. However, some respondents who supported this proposal also felt that employers may require qualifications that go beyond the standard's KSBs, and that such qualifications would add value.

Comments made by respondents who disagreed or strongly disagreed with our proposal (32% of respondents)

Many respondents who either disagreed or strongly disagreed with this approach generally felt that the qualification should align with the standard, but should also be able to go wider to add value to both the apprentice and employer.

A large number of responses outlined the need for qualifications to provide the broader perspective of an occupation, which is often not covered by the apprenticeship itself, but is still beneficial context for supporting wider knowledge of other roles in the sector or industry.

A few respondents felt that the apprenticeship KSBs are too role focused and don't reflect workplace practice or the multi-functional requirements in every business, whereas qualifications provide more detail and a broader breadth of knowledge that supports and extends the apprenticeship.

A number of respondents who either disagreed or strongly disagreed felt that the proposal is unrealistic, unlikely or even unnecessary for the qualification content to always be perfectly aligned with the occupational standard.

Many respondents felt that the reason a qualification should go wider than the standard itself is to allow a balanced approach that provides a more rounded learning experience to support full occupational competence.

A large number of respondents also felt that to restrict qualifications within the boundaries of the standard would be a disadvantage to apprentices, removing the stretch and challenge, or innovation and adaptability that learners need to be competent in their workplace and meet future employer and labour market needs.

Many respondents also felt that qualifications are more able to be flexible and adapt to the changing market and employer needs quicker than an occupational standard, and that they can support changing technology and industry developments which move at a faster pace.

Similarly, a number of responses noted that regulatory or professional body

qualifications are developed with a broader criteria whereas an apprenticeship is only intended for a specific role. Respondents felt that the qualification may therefore cover content that is broader than the minimum competence in the standard, providing context or support for future progression in that occupation. Some respondents noted that certain sectors also require the qualification for membership, and so it would disadvantage apprentices if they didn't have it.

A few respondents felt that standards should be made to align with professional or regulatory qualifications, since these have been accepted as sector or industry standards to ensure consistency. Although some respondents were concerned about the potential complexities that complete KSB alignment would create in relation to future syllabus updates, and revision cycles for professional and regulatory qualifications in line with market needs. One respondent also identified the risk of complete alignment in relation to other qualification reforms, and future volatility in the market.

A small number of respondents commented on how a qualification is typically more high-level and descriptive in its design than an apprenticeship's KSBs, and to restrict the qualification might reduce the quality and opportunity for progression in some sectors.

A few respondents also suggested that a detailed mapping exercise would be needed, since apprenticeship KSBs are designed to be statements of broad competence and so comparison with a qualification would not be like for like.

A large number of comments called for a pragmatic and flexible approach to mandating qualifications, stating that one of the core objectives for the future success of apprenticeships is that flexibility is built into the system to enable meeting future labour market demand. For example, some respondents suggested that there could be a margin of allowance built into the process to not add undue burden to the apprentice. One respondent proposed that the wording is softened to emphasise the 'alignment' but to leave scope for the qualification to go beyond KSBs where appropriate and needed to do so.

A few responses questioned who would make the decision on the mapping of KSBs, and whether a trailblazer group represented sufficient stakeholders to support the expertise needed to determine this. Some also acknowledged this may be burdensome for trailblazer groups and employers who may not have the capability or expertise to map or write the KSBs, with one respondent who felt the practical implementation of this would be highly subjective.

A small number of respondents also felt that these proposals might mean that awarding organisations have to develop and maintain alternative qualifications to accommodate apprenticeships, and that this would be costly, burdensome, ineffective and not focused

on learner outcomes. One respondent felt that this could deter some awarding bodies and ultimately reduce provision across England leading to a decrease in the number of apprenticeship starts, and a couple of respondents felt this could degrade the value of the qualification or drive the wrong behaviours.

A few respondents who disagreed or significantly disagreed with this proposal commented that if all the KSBs are aligned, then this may cause more duplication of assessment which is contrary to what the proposal is aiming to address.

Comments made by respondents who neither agreed nor disagreed with our proposal (11% of respondents)

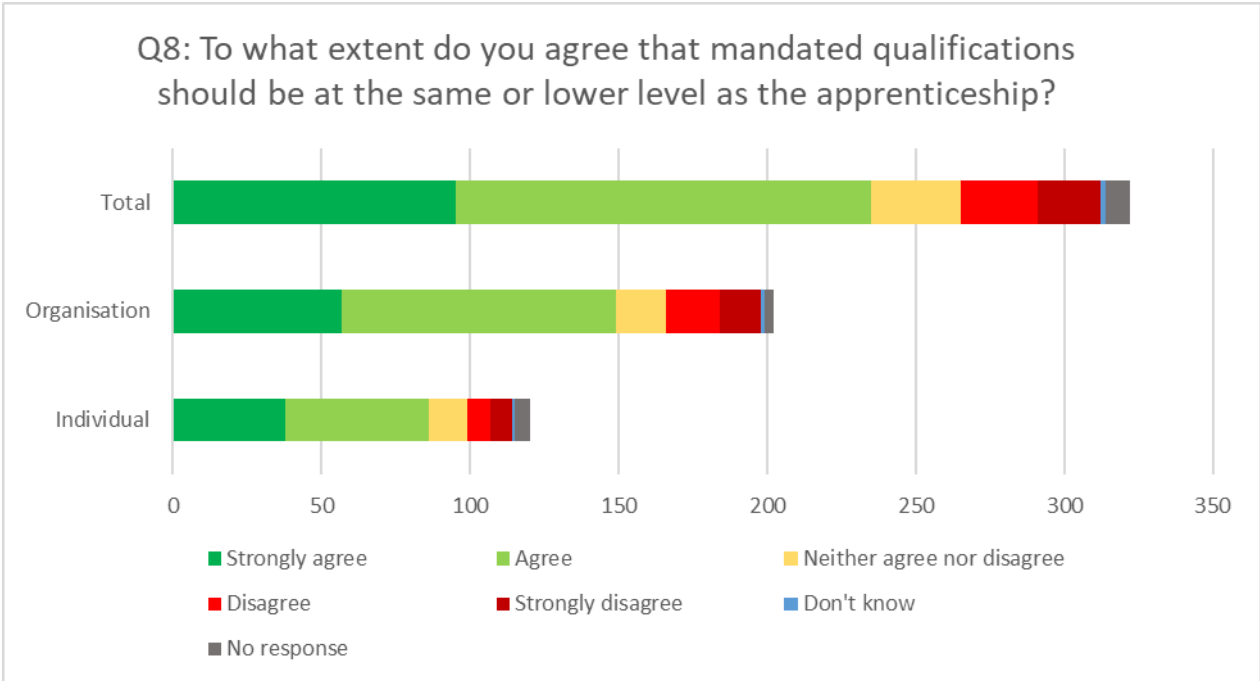
Most of the respondents who did not indicate their agreement or disagreement to this question, felt that in general qualifications and occupational standards should, or already do by default, identify the same core set of KSBs needed for a role.

There were a number of comments that identified similar points to those already mentioned above. These included:

- The potential for either qualifications or standards to be amended to ensure alignment of the KSBs.
- The need for this to be considered on a case-by-case basis with a degree of flexibility based on the occupation and sector in question.
- The need for input from varied stakeholders wider-reaching than the trailblazer group.
- The concept that broader knowledge or optional learning may be advantageous and would add value to the learning experience.
- The idea that the proposal may cause duplicate assessment if the qualification and apprenticeship are assessing exactly the same KSBs.
- The need for regulatory or professional body requirements to be considered.

Some respondents provided other comments that were not pertinent to the question.

Question 8: To what extent do you agree that mandated qualifications should be at the same or lower level as the apprenticeship?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	30%	43%	9%	8%	7%	1%	2%
Organisation	28%	46%	8%	9%	7%	1%	1%
Individual	32%	40%	11%	7%	6%	1%	4%

Comments made by respondents who agreed or strongly agreed with our proposal (73% of respondents)

The majority of respondents either agreed or significantly agreed with this question. Most of the respondents showed overwhelming support for the default position that qualifications should only be mandated at the same level as the apprenticeship.

Many respondents felt that the only way to effectively reflect the requirements of the occupation are for qualifications to be at the same level, and supported this view with the acknowledgment that this would place them at equal value in the profession. Some comments also suggested that it would support parity between the qualification and the apprenticeship.

A number of respondents suggested that the same level of qualification would help to support apprentice progression opportunities and would ensure a more coherent and consistent learning experience, with one response acknowledging this will ensure providers can competently and confidently deliver the qualification to the right level.

In support of this proposal, a large number of respondents felt that qualifications should not be at a higher-level than the apprenticeship since this could cause more work than is needed and create unnecessary teaching and assessment burden. Many respondents also felt that this could disadvantage apprentices by creating potential issues to participation and barriers to achievement or completion.

In addition, many respondents acknowledged that students often undertake apprenticeships due to their inability to access other routes to education. They felt that to expect a higher-level of qualification from these students would place them at a disadvantage, especially for learners who may already struggle to meet the core level requirements of the apprenticeship.

A few respondents also felt that mandating a qualification at a higher-level than the apprenticeship itself would undermine the credibility of the programme and suggested that if a higher-level qualification is being proposed then the standard itself may need revising.

However, a number of respondents who agreed with this proposal also acknowledged the need to provide 'stretch' and challenge as part of the apprentice learning journey. A few respondents suggested that the ability to include a unit at a higher-level than the standard is appropriate for the overall learning. Some suggested an example of where there may need to be exceptions for higher-level qualifications is where there is an essential qualification (e.g. First Aid at Work) at level 3, but it is needed in a level 2 apprenticeship.

Many respondents also felt that allowing qualifications at a lower-level than the standard would support the apprentice learning journey. Respondents also noted about how this can support 'spikey' profiles, and that a lower-level qualification would be appropriate in certain sectors and in specific circumstances where the trailblazer group has justified the need.

A number of respondents acknowledged that within a qualification there may be aspects of the learning outcomes which are above or below the level of that qualification and standard. They felt this should be allowed, depending on the profile of the occupation and by ensuring the apprentice completes at the appropriate level. In addition, a few respondents felt that the range of skills and competences required in an occupation are not always at the same level, and there may be a mix of different levels.

A few respondents felt that any decision on the level of the qualification should be based on employer needs, and that it is important to trust in the trailblazer process and recommendations. In support of this, many respondents were keen for a degree of flexibility in the process to ensure occupational needs are fully considered on a case-by-case basis.

Comments made by respondents who disagreed or strongly disagreed with our proposal (15% of respondents)

Overall respondents that disagreed or strongly disagreed with this question felt that qualifications should only be mandated at the same level (not higher or lower), with many of the comments in support of this outlining similar reasons to those already mentioned above.

However, a large number of respondents that disagreed with this question felt that the qualification should be of a higher-level to extend and 'stretch' the capabilities of the apprentice. They felt this will enable progression opportunities and support the overall learning, with a few commenting that they are currently using qualifications which are higher.

As above, a few respondents were keen to emphasise the importance of considering the needs of 'spikey' profiles, and that many occupations may include knowledge or learning that is at higher or lower levels.

Some respondents commented that these proposals assume that all qualifications and occupational standards are always graded and pitched at the correct level, but that this might not always be the case.

A number of respondents also suggested that it doesn't make sense in certain sectors to be too prescriptive on levels, and that a more flexible approach to suit employers with guidelines on the level of variation permitted would be better.

It was also reflected in a few responses that if a lower-level qualification is needed to accurately reflect the occupation, then perhaps the standard should be revised to that lower-level.

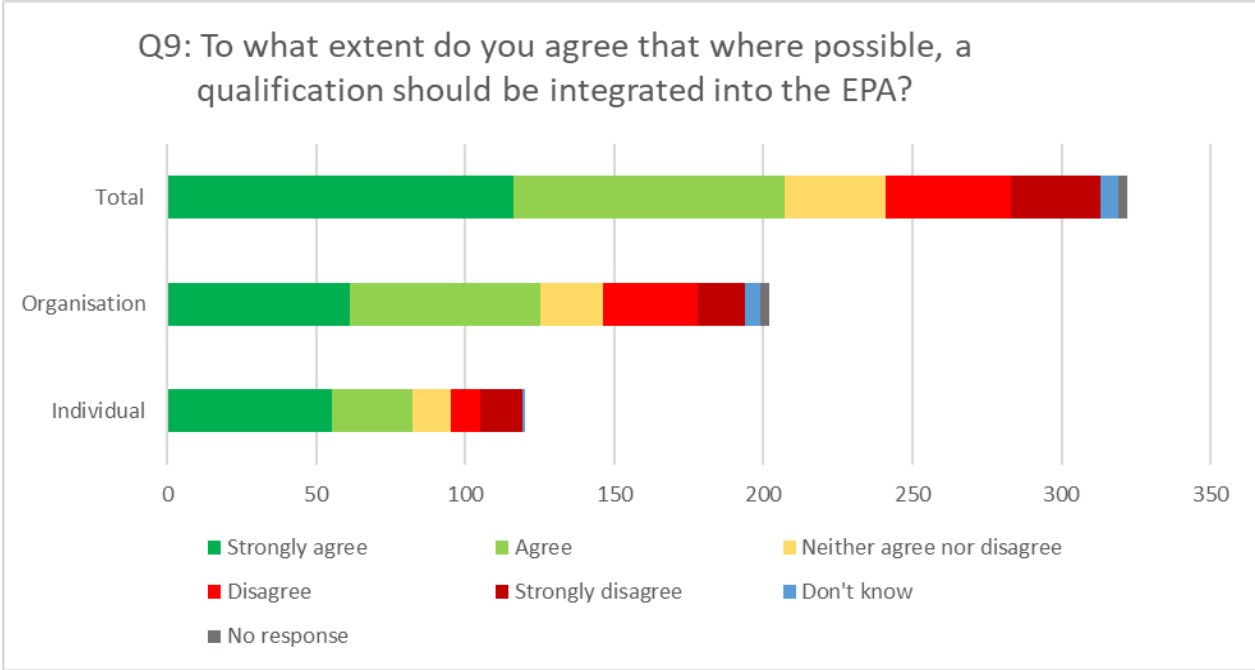
A small number of respondents identified that in terms of integration at EPA, different levels between the qualification and apprenticeship would cause problems. They felt that assessment cannot be at an appropriate level for both the qualification and the apprenticeship, and that it would cause issues for the assessors who would need to contextualise the different outcomes and balance a decision.

Comments made by respondents who neither agreed nor disagreed with our proposal (9% of respondents)

Respondent comments to this question were similar to many of the points already mentioned above, with a general agreement that qualifications should be at the same or lower-level as the apprenticeship but with consideration on a case-by-case basis.

There were a number of comments about how the proposals assume that all qualifications and standards are always graded and pitched at the correct level, but it is important to note that this might not always be the case.

Question 9: To what extent do you agree that where possible, a qualification should be integrated into the EPA?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	36%	28%	11%	13%	9%	2%	1%
Organisation	30%	32%	10%	16%	8%	2%	1%
Individual	46%	23%	11%	8%	12%	1%	0%

Comments made by respondents who either agreed or strongly agreed with our proposal (64% of respondents)

The majority of respondents either agreed or strongly agreed with our proposal, with many noting that integrating the qualification with the assessment where possible would improve completion rates and create a more streamlined delivery.

Some respondents noted specific benefits of integration to the apprenticeship programme, suggesting that apprenticeships are likely to be held in higher regard as a result of more completions, especially when linked to a recognised and respected qualification. One respondent suggested that integration could also have a positive impact on other parts of the programme. For example, with apprentices who remain on programme more likely to complete English and maths qualifications where required.

Many respondents also commented on the positive impact of this proposal on apprentices. They felt integration would ensure apprentices completed their

apprenticeship with the best evidence of their achievements and that it would reduce duplication, over-assessment, and assessment confusion. Some respondents felt that integration would support an apprentice's overall experience, helping them to stay motivated to complete EPA.

A small number of respondents who agreed with the question also noted that an apprentice should not be prevented from completing a qualification if they are unable to complete the EPA, for example due to employment changes. Respondents also noted that transcripts of partial completion (both in terms of the qualification and the apprenticeship) should be available to apprentices as recognition of what they have achieved prior to withdrawal, and to allow them to return to the apprenticeship or qualification at a later date without needing to repeat learning.

A number of respondents suggested that integration would limit undesirable behaviour in the system. They felt that some use the apprenticeship to fund desirable qualifications, with no intention of apprentices completing their EPA.

Respondents also noted some specific risks with our proposals. These included:

- Monopolistic behaviour, and the potential for smaller awarding bodies and specialist EPAOs to be pushed out of the market given that delivery would likely be simpler where the awarding body and EPAO are the same organisation.
- Potential compliance complexities, for example investigating malpractice where the awarding organisation and EPAO are different.
- The need for integration decisions to be made early to account for the impact on awarding body and EPAO delivery, assessment and quality assurance processes.
- Concern about a lack of funding for training providers post-gateway.
- The need for qualification assessment to be done in a timely way to ensure all EPA requirements are completed within the prescribed window, and for appropriate processes to be in place when there are legitimate and valid delays.
- The need for a joined-up approach and clear explanations of roles and processes, including ensuring the necessary agreements are in place to allow sharing of results and other information between parties.
- Consideration of resit opportunities and procedures where an integrated assessment is not passed.
- Careful implementation of the policy, and trialling where possible.

A small number of respondents noted the benefits of this approach, and expressed a preference for there to be one awarding body and EPAO (preferably the same

organisation) delivering the qualification and EPA. They felt this would provide the most straightforward and simplest design and delivery model and make the sharing of results and other information between organisations easier.

Comments made by respondents who either disagreed or strongly disagreed with our proposal (22% of respondents)

Many of the responses from those who either disagreed or strongly disagreed with our proposal queried or warned of misunderstanding about who has responsibility for the integrated qualifications' assessments. They also noted a number of risks and impacts on awarding bodies and EPAOs, including the potential for monopolistic behaviour and the potential cost of having to redesign qualifications and assessments.

Some respondents commented on the need to comply with Ofqual's General Conditions of Recognition, highlighting the need for robust third-party agreements in order to remain compliant. One respondent queried how different assessments will be managed, for example where an integrated assessment is offered by numerous awarding bodies. One respondent queried how the funding would be split between the awarding organisation and EPAO.

Many of these respondents noted the potential complexities and difficulties in applying this policy. One respondent who disagreed thought that the difficulty in implementing the policy would outweigh any potential benefits. Some respondents felt that integration would not improve completion rates, and that other reasons for apprentices not completing should be investigated and addressed. Some respondents suggested that instead of integrating qualifications into the EPA, the award of the qualification should be withheld until the EPA has been completed.

Respondents suggested the need for flexibility in the policy, and that there should not be a standard approach applied across all apprenticeships given the range and diversity of the qualifications in scope. Many noted particular instances where integration would not be appropriate for the apprenticeship they were familiar with, for example where a qualification was needed early in an apprenticeship. One respondent went further, suggesting the decision to integrate should be delegated to individual employers and training providers where there was a specific risk of non-completion.

A number of respondents raised concerns about the implementation of the policy, these included:

- Integration would result in greater amounts of terminal assessment.
- Integration could prolong gateway.
- Any delay in awarding the qualification as a result of integration would have a negative impact on learners, including where they are looking to secure a new job role.

- Integration would have a negative impact on the independence and integrity of the EPA.
- Whether the apprenticeship could be awarded if an apprentice has passed their integrated assessment, but failed EPA.

Several respondents provided comments which were beyond the scope of the question. These largely related to the desire to remove qualifications entirely and use the EPA as the only assessment, or in contrast, they questioned the validity of EPA and expressed a preference for qualifications. A small number of comments from those who either disagreed or strongly disagreed suggested support for our proposals.

Comments made by respondents who neither agreed nor disagreed with our proposal (11% of respondents)

Many respondents recognised the benefits of our proposal, however they also echoed a number of considerations already raised by other respondents. These included:

- The need for flexibility to allow for differences between sectors.
- Potential negative impacts on the EPA, including assessment availability, timeliness, duration, and independence.
- Potential negative impacts on awarding organisations in terms of qualification redesign, and on training providers to support the delivery of qualification assessment post-gateway.
- The need for awarding bodies to retain responsibility for the integrated portion of their qualifications.
- A request for further implementation information before fully agreeing with our proposal.
- Clarification about what happens if the integrated assessment is passed, but the EPA is failed.

Comments made by respondents who selected 'don't know' or who left a comment but did not use the scale to indicate agreement (3% of respondents)

The respondents who selected they didn't know, raised the following points:

- Integration should be managed on a standard-by-standard basis.
- Implementation could be complex where the awarding body and EPAO are different organisations. Where they are the same, care needs to be taken to avoid 'bundling'.

- The qualification's award should be withheld until the EPA has been completed.

The only respondent who left a comment but had not signalled agreement using the scale noted that more evidence was required to understand how our proposal would work in practice. They also noted potential issues for awarding organisations in terms of complying with Ofqual's conditions.

Question 10: We have identified some scenarios in which integration might not be appropriate or possible. If you have further examples, please provide details to support our policy development around integration.

Of the 322 respondents to our online survey, 126 left comments in response to this question. 57 of these comments referenced actual or potential instances where integration may not be possible.

Many of the comments submitted described potential benefits and risks of integration beyond the scope of the question and have (in line with [our approach to analysis](#)) been captured elsewhere in this analysis document. Some comments, for example those referring to whether qualifications should be used in apprenticeships at all, were beyond the scope of this consultation.

Those respondents who did provide comments outlining instances where integration might not be possible, offered the following scenarios:

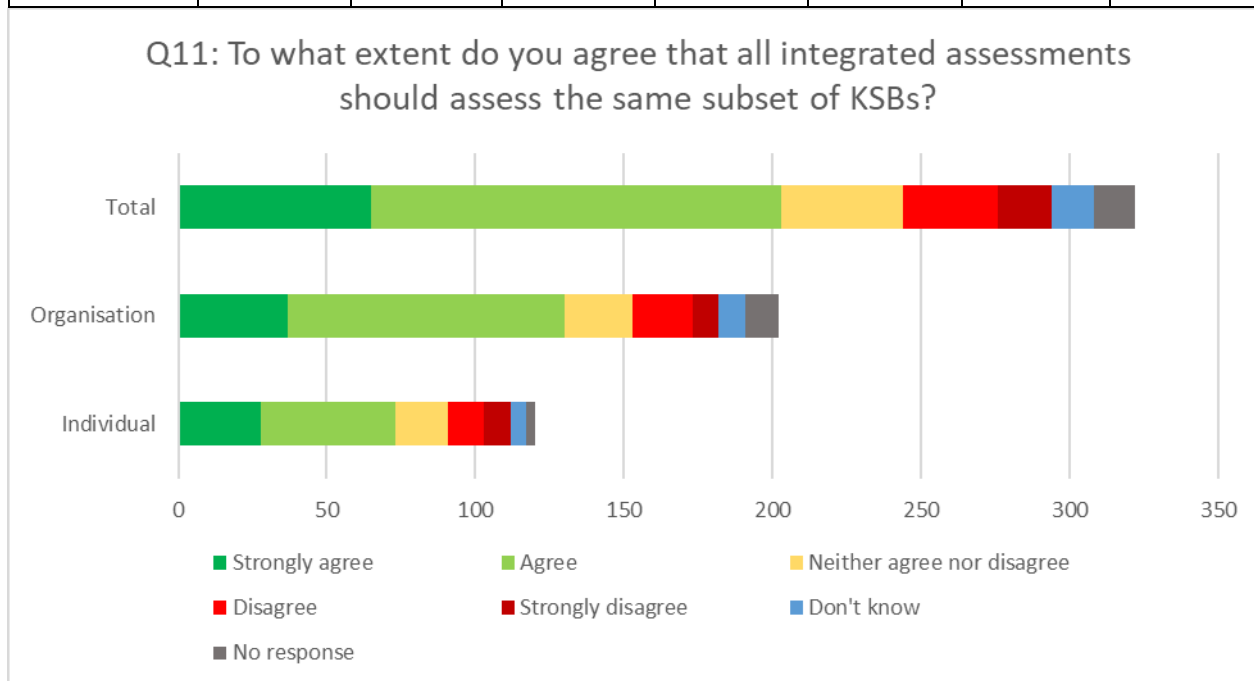
- Where there are sequencing considerations. For example, when the completion of a qualification or licence is required for working under supervision, or to operate a certain class of vehicle, or for safeguarding purposes.
- Where the qualification (or part of a qualification) assessment is knowledge-based and delivers underpinning knowledge early in the apprenticeship.
- Where there are a certain number of hours of work experience needed for regulatory or professional requirements, and integration would alter this timescale.
- Where there is significant or substantial overlap between the qualification and the EPA, in which instance it may be preferable to remove the EPA requirement.
- Where there is significant optionality, either in terms of the number of qualifications available across multiple awarding bodies, or the number of EPAOs.

- Where there are significant risks to the integrity of the EPA, for example where a professional body is also the awarding body and the EPAO.
- Where a qualification is not structured modularly.
- Where a qualification uses an assessment method which would be difficult to integrate.
- Where a qualification is required to be completed pre-gateway.
- Where it would raise significant delivery challenges, for example when an apprentice is employed for a fixed-term, and integration risks extending assessment beyond their contractual period.
- Where there are quality or timeliness concerns about the design of a qualification, its delivery, or award.
- Where a qualification is very small and only assesses a very small number of the KSBs.

Question 11: To what extent do you agree that all integrated assessments should assess the same subset of KSBs?

Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	20%	43%	13%	10%	6%	4%	4%

Organisation	18%	46%	11%	10%	4%	4%	5%
Individual	23%	38%	15%	10%	8%	4%	3%



Comments made by respondents who either agreed or strongly agreed with our proposal (63% of respondents)

The majority of respondents agreed with our proposal. Comments suggested respondents felt that this approach will ensure consistency and comparability, and the right content is delivered to all apprentices. One respondent noted greater comparability may reduce the risk of employers or training providers choosing qualifications because there is a perception that one may be easier to achieve than the other. Respondents also thought this proposal would ensure a more streamlined and simpler approach to integration.

Some respondents noted that there may be challenges to this approach where there are variations depending on occupational specialisms or options within the standard. Other respondents commented on the potential impact for awarding organisations where units, assessments or qualifications may need some redesigning.

Some respondents commented that they would welcome further detail about how the subset should be identified and agreed, and whether this would remain the responsibility of the trailblazers.

Comments made by respondents who either disagreed or strongly disagreed with our proposal (16% of respondents)

Many of the comments from those who disagreed or strongly disagreed were on the grounds of disagreeing with integration more widely, rather than the question itself. Others offered their thoughts about the design of the occupational standard and the KSBs, or to make a case for qualifications being able to deliver content not captured in the standard. These comments have been included in our analysis in previous questions.

Some respondents who disagreed or strongly disagreed with this proposal felt that there should be variation within the integrated qualification assessments, and that they should not be limited to a single subset of the KSBs. They thought that the needs of employers should be prioritised, and that if they identify a number of different qualifications that assess different KSBs then this should take priority over consistency between the qualifications. They felt that where there are variations, each should be captured in the assessment plan. Other respondents thought that variation between qualifications provides positive market competition and choice for qualification users.

Respondents noted particular impacts on awarding organisations and the market. These comments included the potential need for qualifications to be redesigned, as some respondents felt the variation in content and assessment methods between qualifications would make identifying an existing subset difficult.

Respondents noted that changing qualification design and assessment could lead to the following negative impacts:

- Market proliferation.
- Potential conflict with Ofqual's General Conditions of Recognition.
- No longer meeting the needs of learners.
- Quality and validity of the qualifications and their assessment.
- Resource and financial burden for awarding bodies.

Respondents also noted these impacts when updating qualifications, for example, where there would be potential changes to the integrated assessment and the defined subset.

One respondent thought that introducing these rules would restrict innovation, and another felt that these rules increased the risk of introducing unintended consequences.

Comments made by respondents who neither agreed nor disagreed with our proposal (13% of respondents)

Comments made by respondents who neither agreed nor disagreed with our proposal included:

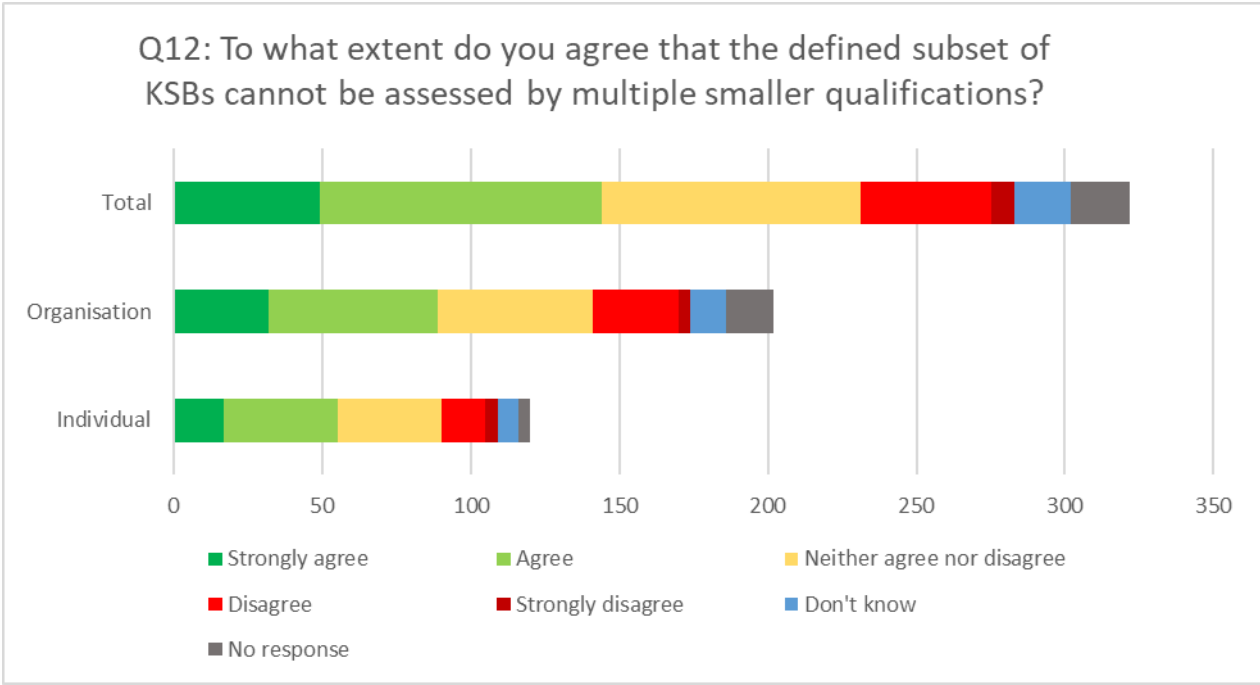
- Agreement with the question, dependent on the subset selected and whether there was any flexibility.
- Agreement with the question, but a note that the approach is likely to vary depending on the standard.
- A query about how the common subset will be determined and monitored.
- Disagreement with integration, but agreement that this proposal would deliver standardisation and comparability of outcomes.
- The need for the subset to be clearly identified in the standard and assessment plan.
- A suggestion that our proposal does not go far enough to secure comparability and fairness, as there is only standardisation of the KSB subset and not the assessments themselves.

Comments made by respondents who selected 'don't know' (4% of respondents)

Respondents who selected 'don't know', made the following comments:

- There should be some flexibilities.
- Trailblazers are best placed to address this proposal.

Question 12: To what extent do you agree that the defined subset of KSBs cannot be assessed by multiple smaller qualifications?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	15%	30%	27%	14%	2%	6%	6%
Organisation	16%	28%	26%	14%	2%	6%	8%
Individual	14%	32%	29%	13%	3%	6%	3%

Comments made by respondents who either agreed or strongly agreed with our proposal (45% of respondents)

Many respondents who either agreed or strongly agreed with our proposal thought that to allow multiple, smaller qualifications to assess the defined subset of KSBs would introduce unnecessary complexity. They warned that such an approach would be resource intensive and introduce additional layers of bureaucracy.

Many respondents noted that they could not think of particular circumstances where it would be necessary to integrate multiple, smaller qualifications, but that there may need to be some flexibility in the policy to allow for exceptions.

Respondents also commented on the potential impact on assessment quality that multiple, smaller qualifications may introduce. These impacts included inconsistency of assessment, and a move towards a less holistic approach to assessment. One respondent felt that this may result in a more disjointed experience for apprentices, with

little understanding of how the different aspects of their learning are connected, and how they can be brought together and applied in the workplace.

Comments made by respondents who either disagreed or strongly disagreed with our proposal (16% of respondents)

Respondents who disagreed or strongly disagreed with our proposals thought there should be some flexibility and that as long as there was alignment with the standard, multiple qualifications could be used in an apprenticeship.

Many respondents seemed to be commenting on the use of qualifications in an apprenticeship more broadly, rather than for integration. In addition, some comments appeared to signal agreement with our proposal.

One respondent thought that we shouldn't actively prevent multiple, smaller qualifications from being integrated, but to ensure that the risks associated with this were suitably managed in the development process. Other comments included:

- That allowing multiple, smaller qualifications to assess a subset of the KSBs should be possible and doesn't need to be overly complex.
- That our proposal would not allow for recognising prior learning achieved through completing smaller qualifications.
- Using larger qualifications might result in confusion with the EPA.

Comments made by respondents who neither agreed nor disagreed with our proposal (27% of respondents)

Many of the respondents who neither agreed nor disagreed recognised the complexities that integrating multiple, smaller qualifications would introduce.

Some didn't feel they could agree with our proposal because they disagreed with integration more broadly, while others felt it should be decided on a case-by-case basis.

Some respondents noted the complexity of this proposal.

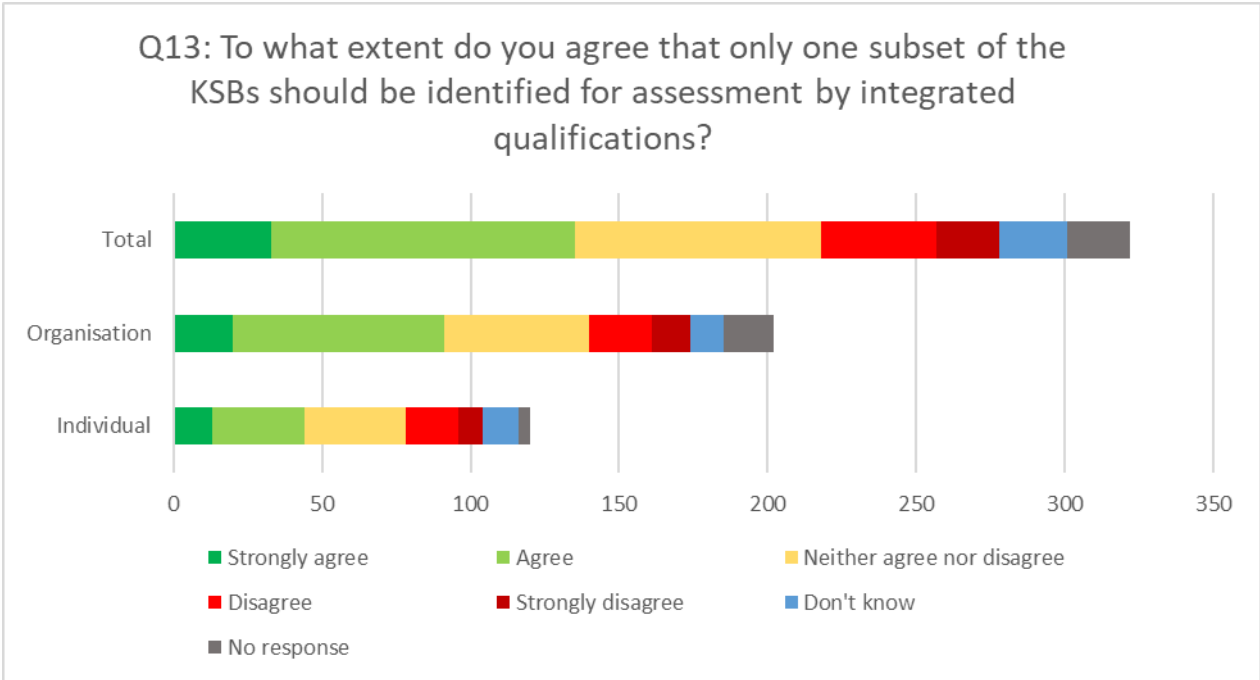
A small number of responses appeared to confuse units and qualifications, thinking that our proposal would prevent multiple modules of the same qualification being integrated. Respondents warned against not allowing qualifications which are structured modularly to be integrated.

Comments made by respondents who selected 'don't know' or who left a comment but did not use the scale to indicate agreement (12% of respondents)

One respondent who did not use the scale to indicate agreement noted that our

proposal was reasonable, but that we should still allow for trailblazers to mandate smaller qualifications which are not integrated.

Question 13: To what extent do you agree that only one subset of the KSBs should be identified for assessment by integrated qualifications?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	10%	32%	26%	12%	7%	7%	7%
Organisation	10%	35%	24%	10%	6%	5%	8%
Individual	11%	26%	28%	15%	7%	10%	3%

Comments made by respondents who either agreed or strongly agreed with our proposal (42% of respondents)

Many respondents who agreed or strongly agreed with this question suggested that our proposals promoted simplification and consistency for apprentices, training providers, and EPAOs. Individual comments included:

- The defined subset of KSBs must be core and common across the qualifications which fulfil the mandate.
- The subset should be relatively small to allow for recognition of learning, but not negatively impact EPA.

- Employer groups alone may not have the expertise to identify the subset.
- IfATE should place a limit on the size of the subset.
- Allowing multiple subsets could result in the qualifications becoming the primary part of the apprenticeship, rather than the standard and the EPA.
- There may be an exception where there are options within a standard.

Comments made by respondents who either disagreed or strongly disagreed with our proposal (19% of respondents)

Those respondents who disagreed and left a comment felt that there should be some flexibility in the process, and that a standard-by-standard approach should be taken.

Some respondents felt that more detail was needed before agreeing to the proposal, and others disagreed with the question as they do not support integration proposals more broadly.

One respondent noted the risk that our proposal might result in awarding bodies developing ‘apprenticeship only’ versions of existing qualifications. A small number of respondents seemed to suggest that the integrated assessment should assess all the KSBs of the standard.

Comments made by respondents who neither agreed nor disagreed with our proposal (26% of respondents)

Many respondents who neither agreed nor disagreed did so because they felt their response would change depending on the standard in question. Linked to this, respondents noted that there was likely to be flexibility needed to account for the differences between standards.

Comments made by respondents who selected ‘don’t know’ or who left a comment but did not use the scale to indicate agreement (14% of respondents)

Of those who did not use the scale to indicate agreement, one comment suggested agreement with our proposal. Another noted that the shared subset could be difficult to identify, given the diversity between qualifications.

Question 14: We have set out our preferred approach to integration and one we know to work. We would welcome your thoughts on how this approach might work for you and any alternative modes of integration you might wish to propose.

Of the 322 respondents, 121 provided comments in response to this question. Many respondents stated that they could see no reason why our approach would not work in their particular circumstances. A large number of respondents also used this question to reiterate concerns and impacts that have been reported against other questions in this analysis document.

One professional body respondent (who did not wish for their response to remain confidential) noted the success of the Level 7 Accounting apprenticeship which they have received positive feedback about from employers, learners and providers. The approach there reflects what is covered in the consultation, and the respondent notes that it sits well alongside the professional qualification route with each of the accounting professional bodies' final test of competency being integrated with the EPA. The tests have common assessment design and assess the same core subset of KSBs, but also allow for some variation to accommodate the particular specialism of each individual professional body. The respondent noted that their professional body recognised another part of the EPA as fulfilling the additional qualification assessment which all other students must complete, and therefore waived this requirement for apprentices. They noted that this further reduced the amount of duplicated assessment and ensured an efficient route to achieving both the apprenticeship and professional body membership.

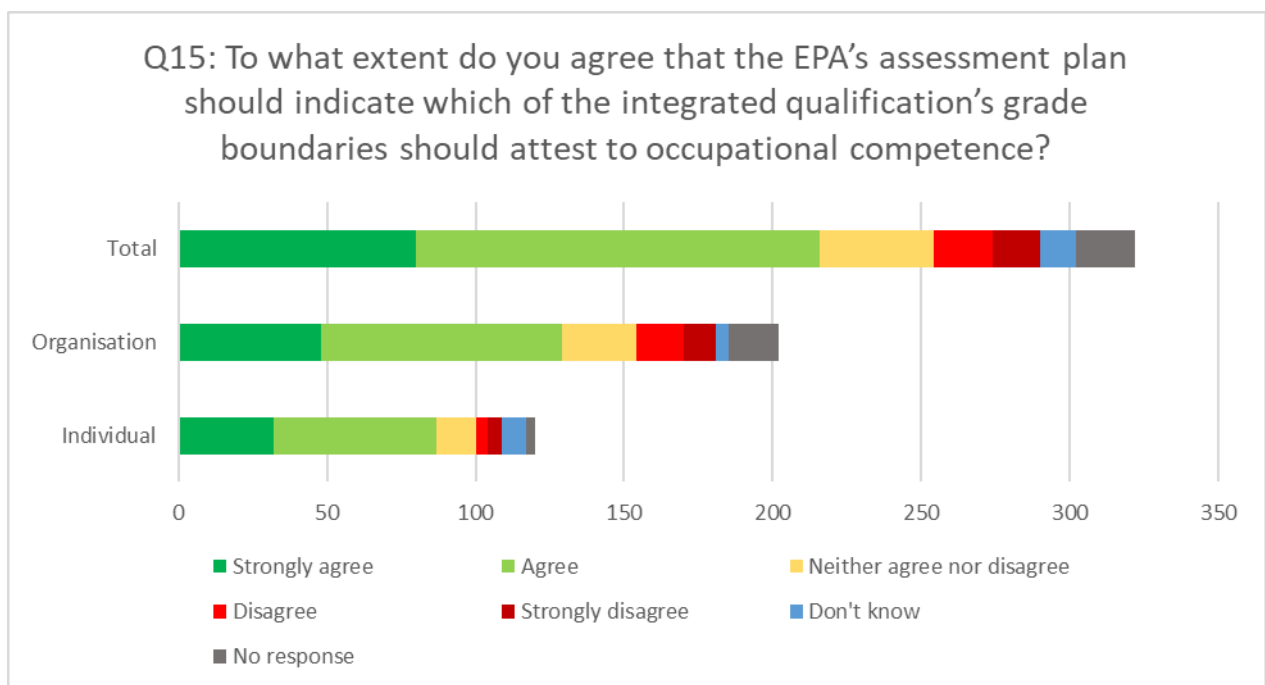
As a large number of respondents requested that we treat their response as confidential, we are unable to report many of the specific examples which were provided in response to this question. However, we have identified the key themes of the responses and include them below:

- Withhold the qualification's certificate until the EPA is complete.
- Map the entire qualification to the KSBs and allow the EPA to assess any remaining content not covered by the qualification.
- Allow the qualification's assessments to replace EPA where appropriate.
- Allow the apprentice to be exempt from taking qualification assessments that assess the same KSBs as part of the EPA.
- Introduce a mid-point assessment to ensure key and underpinning KSBs are assessed before being able to progress to complete the apprenticeship.

- Deliver the final qualification’s assessment only after the EPA has been passed.
- Allow for the majority of apprenticeships to operate as they currently are and give trailblazers and training providers the discretion to integrate where there is a particular risk of non-completion.
- Require the awarding body and the EPAO to be the same.
- An approach where not passing either the EPA or the qualification results in an apprentice not being awarded either certificate.
- To allow for multiple or varying subsets of the KSBs to be assessed by the integrated qualification, for example where there are multiple qualifications mandated.

One respondent suggested that instead of integration, IfATE should work to raise the profile of apprenticeships and ensure their equivalence with qualifications is described and understood. Another respondent noted that they would welcome specific wording on qualification certificates, explicitly linking it to the apprenticeship.

Question 15: To what extent do you agree that the EPA’s assessment plan should indicate which of the integrated qualification’s grade boundaries should attest to occupational competence?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
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Total	25%	42%	12%	6%	5%	4%	6%
Organisation	24%	40%	12%	8%	5%	2%	8%
Individual	27%	46%	11%	3%	4%	7%	3%

Comments made by respondents who either agreed or strongly agreed with our proposal (67% of respondents)

The majority of respondents agreed or strongly agreed with our proposal. They felt this was a necessary step to ensure there was clarity and alignment between the qualification and the apprenticeship and consistency for assessors.

It was important to respondents that the qualification continues to use the grading scale that has been determined to be the most appropriate for that qualification. They also felt that the assessment plan needed to be clear on this point, to ensure that apprentices, training providers and employers know what is expected in order to successfully complete both the qualification and the apprenticeship.

One respondent noted a potential risk, that as the grade thresholds would need to be reflected in the assessment plan, the assessment plan would need to be updated in line with the qualification's review cycle. Another respondent commented that they would not want qualification resit policies (for example, where resit achievement is capped at a particular grade) to impact on apprenticeship achievement.

One respondent felt that where the qualification's grading structure is more than just pass or fail, any grades above a pass should not contribute towards the decision about apprenticeship achievement (where the apprenticeship can also be certificated at levels above a pass).

Finally, one respondent thought achievement of the integrated assessment and the grade awarded should be reported on the apprenticeship certificate.

Comments made by respondents who either disagreed or strongly disagreed with our proposal (11% of respondents)

Many of the respondents who disagreed or strongly disagreed with our proposal did so because they did not agree with integration as an approach, noting it would be too complex and require significant work and resource.

Some respondents mistakenly thought our proposal was intending to introduce grade boundaries above a pass for integrated qualifications.

Those comments which provided a view on grading noted a number of considerations:

- All integrated assessments should have a pass or fail grading structure.

- Not all qualifications demonstrate competence in a role, for example some may demonstrate academic ability.
- A pass in the qualification should be equal to a pass in the apprenticeship, or be set at a threshold where occupational competence is demonstrated.

Comments made by respondents who neither agreed nor disagreed with our proposal (12% of respondents)

A number of respondents who neither agreed nor disagreed noted that all competence qualifications should be pass or fail only, with some noting there is a requirement to attain a pass in some regulated professions. One noted that the EPA should also be pass or fail, likening it to a driving test.

One respondent commented that integrating academic qualifications into the EPA could be problematic, as they are not designed to attest to occupational competence.

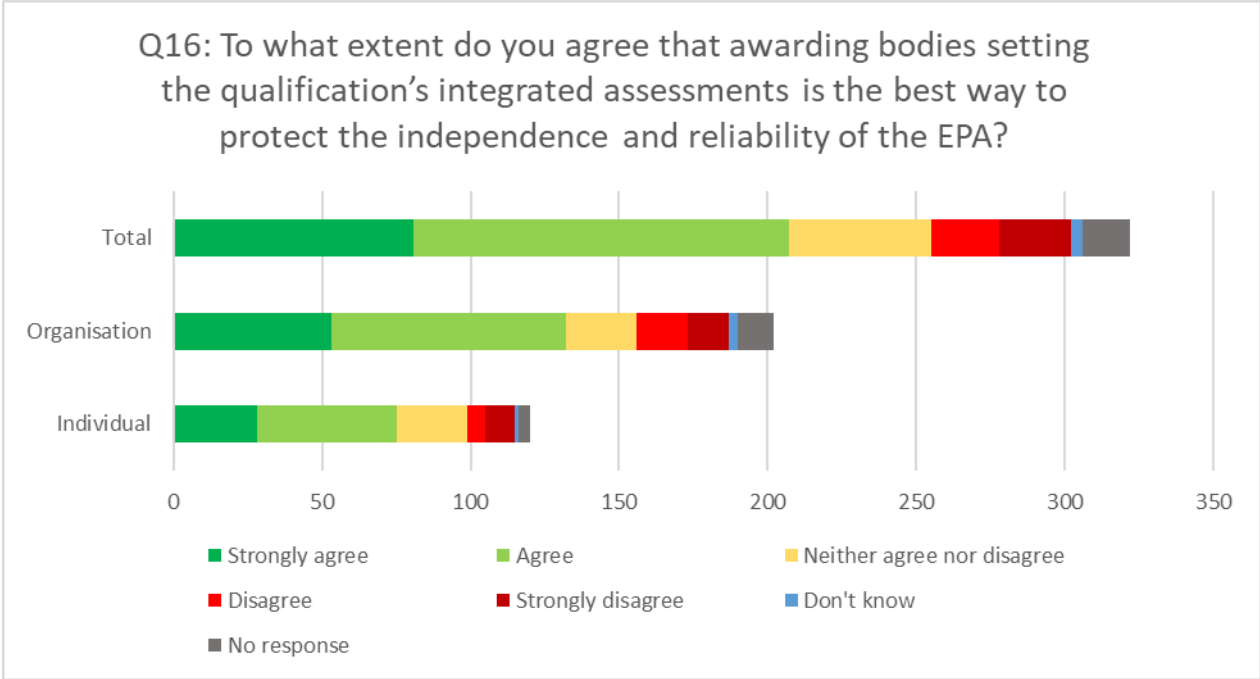
Some respondents noted that the decisions around grade boundaries should reside with the awarding body, and where regulated, Ofqual would need to be assured of the suitability of a qualification's grading approach.

One respondent disagreed with the integrated approach but felt our proposal would be necessary if integration is taken forward.

Comments made by respondents who selected 'don't know' or who left a comment but did not use the scale to indicate agreement (10% of respondents)

One respondent who did not use the scale to indicate agreement thought that our proposal would only be possible where the awarding body and the EPAO were the same organisation.

Question 16: To what extent do you agree that awarding bodies setting the qualification’s integrated assessments is the best way to protect the independence and reliability of the EPA?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	25%	39%	15%	7%	7%	1%	5%
Organisation	26%	39%	12%	8%	7%	1%	6%
Individual	23%	39%	20%	5%	8%	1%	3%

Comments made by respondents who either agreed or strongly agreed with our proposal (64% of respondents)

The majority of respondents either agreed or strongly agreed with our proposal, and they felt that assessments set by the awarding body would be essential to ensure independence. Independence was seen as reassuring to apprentices and employers, and key to delivering fair, consistent, and impartial assessment.

Respondents thought that awarding bodies (rather than training providers or trailblazers) were best placed to set the integrated assessment given their assessment and subject matter expertise. One respondent felt that employers should also be involved and agree the design of the assessment.

A small number of respondents made explicit reference to Ofqual and qualification regulation, expressing a preference that integrated assessments should only be offered by organisations that are Ofqual regulated. One respondent thought that the

requirement for awarding bodies to set the integrated assessment should be captured within Ofqual's regulatory framework.

A small number of respondents noted that our proposal might have some unintended consequences. Some suggested that there will be increased cost and burden on both EPAOs and awarding bodies which may lead to some withdrawing from the market. One respondent felt that employers and trailblazers would make purchasing decisions based on who could deliver the simplest and most streamlined approach. They felt this would mean that they will choose offers where the awarding body and EPAO are the same organisation which may drive out smaller, trusted EPAOs.

A small number of responses appeared to conflate awarding bodies and EPAOs, and as such it was difficult to interpret whether the comments were supporting awarding body or EPAO set integrated assessments.

Comments made by respondents who either disagreed or strongly disagreed with our proposal (14% of respondents)

Respondents who either disagreed or strongly disagreed with our proposal, largely left comments that signalled disagreement with integration more broadly. Noting that any integration was likely to have a negative impact on the independence of the EPA, or that EPA was unnecessary where the qualification carried the currency. One respondent commented that centre assessments are valuable and are no less valid or fair.

Several respondents felt that if awarding organisations had influence over any aspect of the EPA it would compromise the independence of the EPA. Some respondents felt that the design and delivery of the integrated assessment should sit with trailblazers and the EPAO for reasons of independence, but also noting that awarding bodies won't always have sufficient industry expertise.

A few respondents noted a concern that there is insufficient quality control of assessments undertaken by awarding bodies and EPAOs, with others flagging the risk of monopolistic behaviour.

Comments made by respondents who neither agreed nor disagreed with our proposal (15% of respondents)

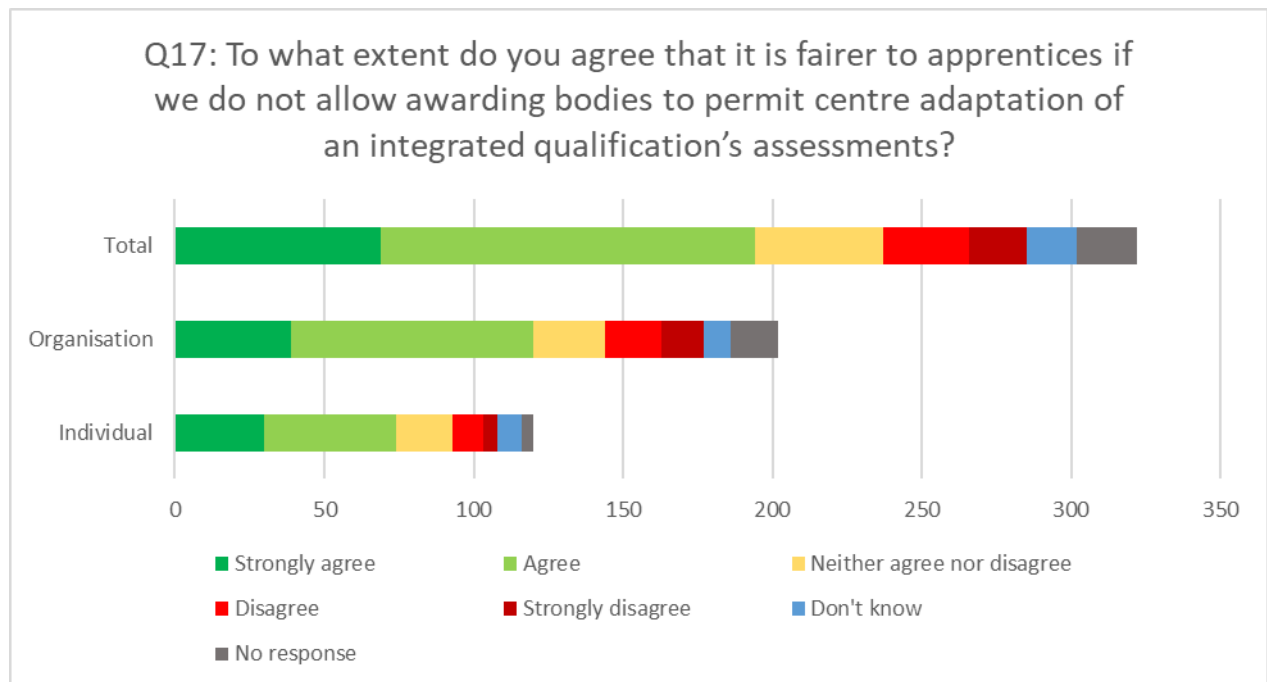
Of those who neither agreed nor disagreed and left a comment, many agreed with our proposal but wanted to offer additional comments for consideration. These included:

- EPAOs should be permitted to deliver the integrated assessments, in line with the specification.
- Robust centre arrangements could be an alternative to awarding body set assessments.

- Employers must be able to input into the design of the integrated assessment.
- There should be consistency across assessments where there are multiple awarding bodies.

A small number of respondents indicated that they agreed with our proposal but disagreed with integration more broadly. A couple of respondents thought that current qualification assessment arrangements should stay in place as they are working well.

Question 17: To what extent do you agree that it is fairer to apprentices if we do not allow awarding bodies to permit centre adaptation of an integrated qualification’s assessments?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	21%	39%	13%	9%	6%	5%	6%
Organisation	19%	40%	12%	9%	7%	4%	8%
Individual	25%	37%	16%	8%	4%	7%	3%

Comments made by respondents who either agreed or strongly agreed with our proposal (60% of respondents)

The majority of respondents either agreed or strongly agreed with this question and felt that our proposal would secure consistency and fairness across the apprenticeship offer.

Some respondents noted the need to ensure that no apprentice is unfairly disadvantaged by preventing centre adaptation, including those who are eligible for reasonable adjustments and special consideration and those who are not. One respondent thought there may be a need to retain some flexibility, to ensure learners in particular education settings continue to have their needs met. In these circumstances, centres should be issued with clear guidance from the awarding body on the scale and type of adaptation permitted.

Respondents also noted the need to consider what emergency adaptations could be permitted to allow for the continued delivery of apprenticeships should there be an unprecedented event (such as the recent pandemic).

One respondent felt that independence is key to the value of EPA, and that the management of it needs to be kept with organisations which are approved and regulated to do this.

Comments made by respondents who either disagreed or strongly disagreed with our proposal (15% of respondents)

Many respondents who disagreed or strongly disagreed noted that there should be some flexibility, to ensure that both the needs of learners and local employers continue to be met. One respondent noted that apprentices could be placed at a disadvantage if centre adaptation is permitted for non-apprentice qualification users.

Some comments from those who either disagreed or strongly disagreed seemed to support our proposal, for example suggesting that it would ensure consistency and only apply to the integrated assessment.

Some respondents disagreed on the basis that they do not agree with our proposal to integrate mandated qualifications.

Comments made by respondents who neither agreed nor disagreed with our proposal (13% of respondents)

Many respondents who neither agreed nor disagreed thought our proposal was sensible but did not agree with integrating mandated qualifications. Others made comments that outline the benefits of both standardisation and flexibility.

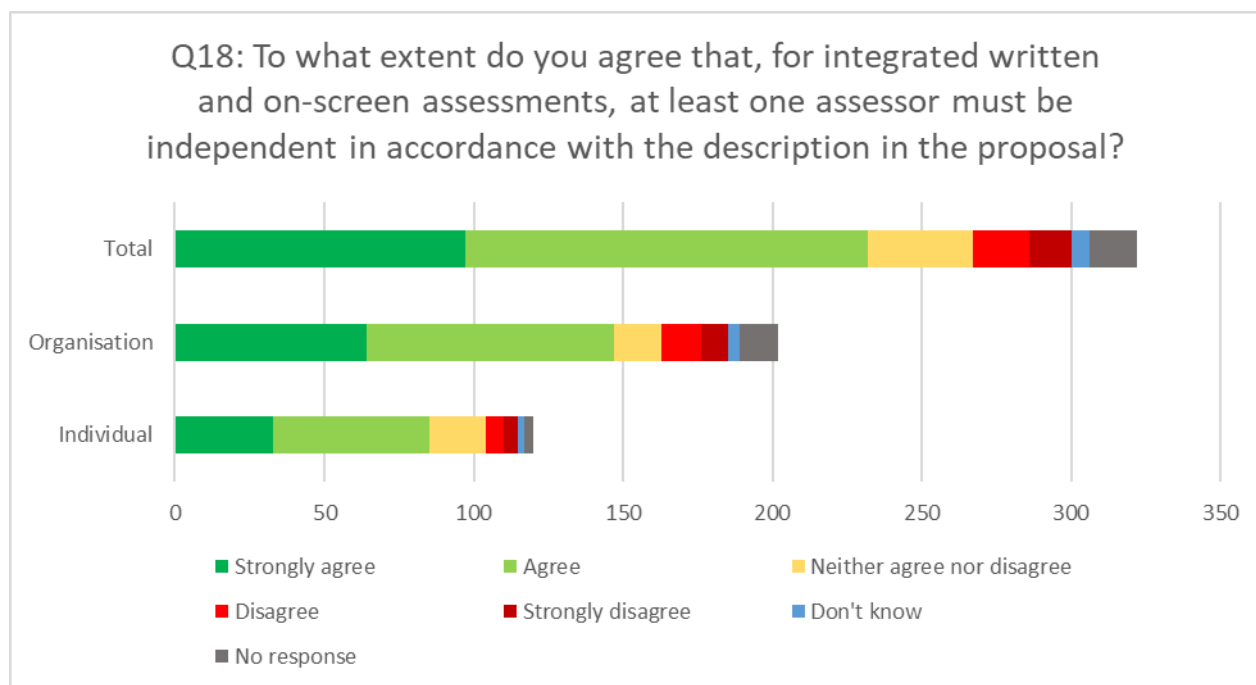
A small number of respondents highlighted concerns about awarding bodies acting in their own interests, which included the potential for them to manipulate qualification outcomes and ignore assessment feedback from providers.

Comments made by respondents who selected 'don't know' or who left a comment but did not use the scale to indicate agreement (11% of respondents)

One respondent who did not use the scale to indicate agreement, left a comment that centre adaptation could introduce inconsistent standards and disadvantage some

apprentices. One referred to potential conflict with Ofqual’s General Conditions of Recognition.

Question 18: To what extent do you agree that, for integrated written and on-screen assessments, at least one assessor must be independent in accordance with the description in the proposal?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	30%	42%	11%	6%	4%	2%	5%
Organisation	32%	41%	8%	6%	4%	2%	6%
Individual	28%	43%	16%	5%	4%	2%	3%

Comments made by respondents who either agreed or strongly agreed with our proposal (72% of respondents)

The majority of respondents either agreed or strongly agreed with our proposal, with many suggesting that it is a reasonable and proportionate approach. Respondents felt that independence is essential in order to secure the reliability and rigour of the EPA, and impartial and comparable assessment decisions. Many pointed to particular examples where this approach is already taken and is well established.

Some respondents noted that we should consider the use of technology (for example, remote proctoring to ensure the integrity of assessments) citing benefits to both the cost of assessment and the availability of suitably independent staff.

Some respondents felt that our proposal should go further and require external assessors only. One respondent noted the need for clear guidance on what qualifies as being sufficiently independent.

Comments made by respondents who either disagreed or strongly disagreed with our proposal (10% of respondents)

Respondents who either disagreed or strongly disagreed with this question, felt that ensuring at least one independent assessor would introduce additional delivery costs. They thought that robust arrangements regarding quality assurance, and internal and external verification should be sufficient instead.

In contrast, other respondents felt our proposals didn't go far enough and that integrated written assessments should be fully independent with external assessors.

One respondent noted the proposal might prove burdensome for awarding bodies, and another raised a potential negative impact on apprentices' health and wellbeing due to unfamiliar assessors.

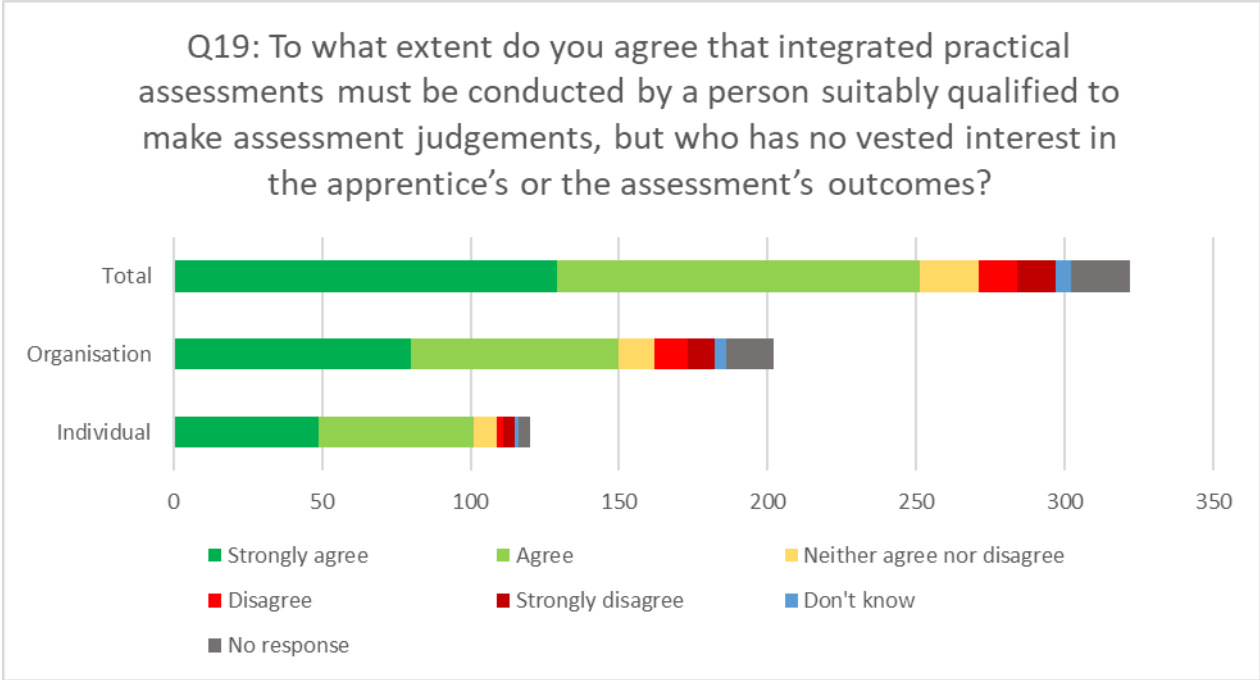
As with other questions, a significant number disagreed with this question since they disagree with integration more broadly.

Comments made by respondents who neither agreed nor disagreed with our proposal (11% of respondents)

Respondents who neither agreed nor disagreed commented that ideally assessment should be completely independent, but noted the logistical difficulties in delivering this. Others noted that they agreed with our proposal, but do not agree with integration more broadly.

One respondent suggested that our proposal could introduce additional costs and burden which might not be proportionate to the risk that is being mitigated. Comments from other respondents suggested that they agree with our proposal, but that it might be difficult to achieve in practice.

Question 19: To what extent do you agree that integrated practical assessments must be conducted by a person suitably qualified to make assessment judgements, but who has no vested interest in the apprentice's or the assessment's outcomes?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	40%	38%	6%	4%	4%	2%	6%
Organisation	40%	35%	6%	5%	4%	2%	8%
Individual	41%	43%	7%	2%	3%	1%	3%

Comments made by respondents who either agreed or strongly agreed with our proposal (78% of respondents)

The majority of respondents either agreed or strongly agreed with this question, and comments showed that they thought our approach is sensible, proportionate, and would retain the independence of the EPA. Some respondents noted the need for further guidance on the suitability of assessors.

Respondents also suggested that assessor availability may present issues in implementation, with some suggesting that the EPAO should be permitted to deliver a qualification's integrated assessment. Some respondents noted that independent external assessments could introduce additional costs, and that this may in turn have an impact on the availability of particular qualifications.

A small number of respondents felt our proposal didn't go far enough, and that the

assessment should be fully independent to mirror EPA requirements. One respondent agreed that assessors should be suitably qualified, but felt that centre assessment was sufficiently valid.

Comments made by respondents who either disagreed or strongly disagreed with our proposal (8% of respondents)

Many of the respondents who either disagreed or strongly disagreed with our proposal overall, agreed with the intention but noted issues with assessor availability.

Respondents noted that existing assessor shortages in particular sectors were negatively impacting on assessment availability, consequently delaying the assessment and results being issued to apprentices.

Respondents felt that issues of independence could be mitigated by clear and comprehensive quality assurance processes, with one respondent suggesting that the expertise of the assessor should be prioritised over their independence.

Comments made by respondents who neither agreed nor disagreed with our proposal (6% of respondents)

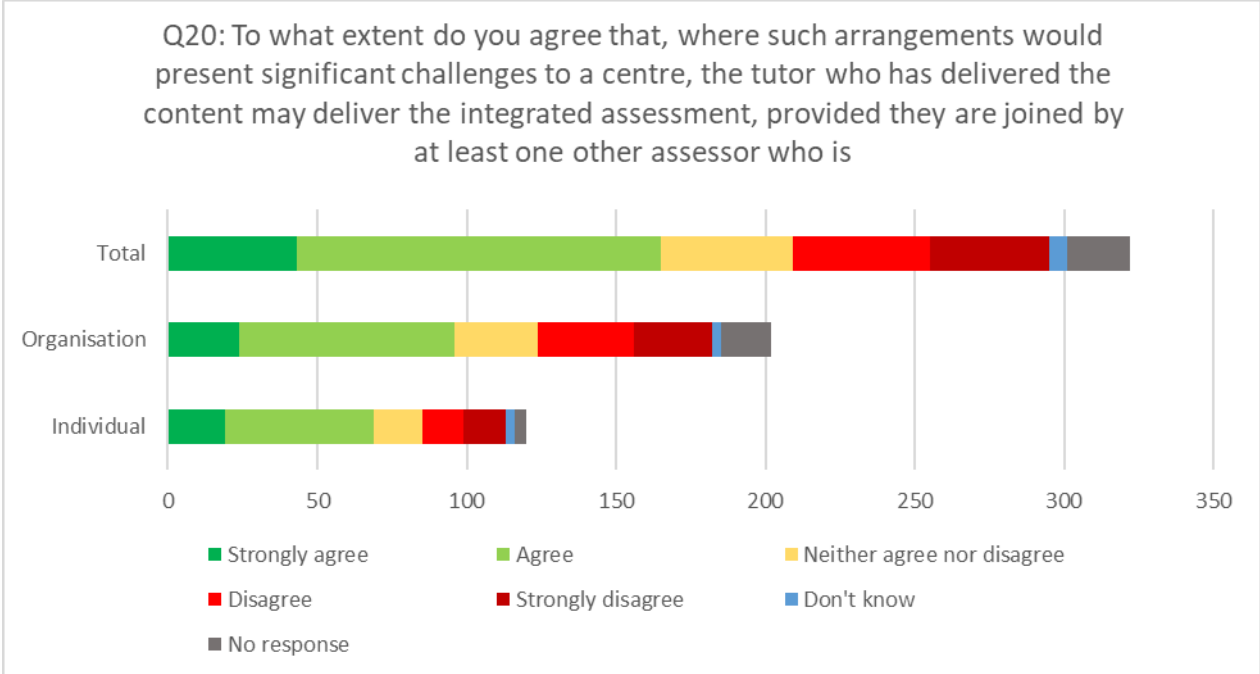
Respondents who neither agreed nor disagreed also noted potential issues with assessor availability as described above. Some also noted that they agreed with our proposal but disagreed with integration generally.

Comments made by respondents who did not use the scale to indicate agreement (6% of respondents)

One response seemed to suggest that the degree of expertise and independence may vary depending on the mode of assessment, or the role of the assessor (for example, whether invigilating or marking an assessment).

Other comments appeared to agree with our proposal.

Question 20: To what extent do you agree that, where such arrangements would present significant challenges to a centre, the tutor who has delivered the content may deliver the integrated assessment, provided they are joined by at least one other assessor who is sufficiently independent. Please provide examples of any potential challenges in your response, where applicable.



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	13%	38%	14%	14%	12%	2%	7%
Organisation	12%	36%	14%	16%	13%	1%	8%
Individual	16%	42%	13%	12%	12%	3%	3%

Comments made by respondents who either agreed or strongly agreed with our proposal (51% of respondents)

Just over half of all respondents either agreed or strongly agreed with our proposal and felt that the approach we have set out is practical and reasonable. Overall, they felt that this should only be used in exceptional circumstances and that a pragmatic approach such as this would avoid unnecessary delay and reduce disadvantage to apprentices through delayed assessment. Some respondents also noted that in particular circumstances this might be the only practical way to deliver assessments.

A few respondents commented that they would welcome further guidance on what constitutes sufficient independence and what requirements there would be around assessors, for example in terms of subject or assessment expertise.

Some respondents noted that our proposal may introduce a risk of assessment bias and that where exceptions are made, clear guidance and robust quality assurance would be required. One respondent suggested that the independence of the second assessor should be verified, while another felt that where there was disagreement the final decision should rest with the independent assessor.

One respondent suggested that IfATE needs to consider how the proposals would work where assessments are undertaken in the workplace rather than in a centre.

Comments made by respondents who either disagreed or strongly disagreed with our proposal (26% of respondents)

Respondents who either disagreed or strongly disagreed thought that it was essential to ensure the integrated assessment remained fully independent, and that the delivery tutor should have no role in assessment. They thought that our proposal introduced too high a risk of bias and subjectivity in assessment judgements. Some respondents noted that there may need to be some exceptions, for example in niche occupations where there is scarcity of assessors, or where special permissions were required on particular sites. One respondent commented that the second assessor would only need to be an assessment expert, and not necessarily have subject expertise. Some respondents commented that the EPAO would be best placed to deliver assessment and ensure independence.

Equally, many respondents thought that our proposals were not needed and that qualification assessments should continue as they are currently being delivered, providing there is robust internal and external quality assurance.

Some respondents noted that they did not understand the intention or benefits of our proposal. For example, the benefit of having a subject tutor present if there was an independent tutor present. Some respondents' comments suggested they thought our proposal applied to all aspects of the EPA, not just the integrated qualification assessment.

Some respondents noted that our proposal, while well intentioned, would not fully address issues of assessor availability. One respondent commented that smaller centres especially would find it challenging to find a second assessor. A small number thought that our proposal may introduce additional cost burden, and the difficulty in implementing it would outweigh any benefits.

A small number of respondents disagreed with our proposal because they disagree with integration more broadly.

Comments made by respondents who neither agreed nor disagreed with our proposal (14% of respondents)

Respondents who neither agreed nor disagreed with our proposal made many of the comments captured above. Respondents thought that our proposal should be by exception, only when there is no alternative. Respondents also noted the potential increase in cost, and that assessor availability may hinder implementation.

One respondent thought that having multiple assessors could have an impact on learners undertaking assessments. Another thought that other approaches, such as remote invigilation or moderation activities could be a good alternative. One respondent suggested that all integrated assessments should be regulated and delivered in line with their respective assessment arrangements.

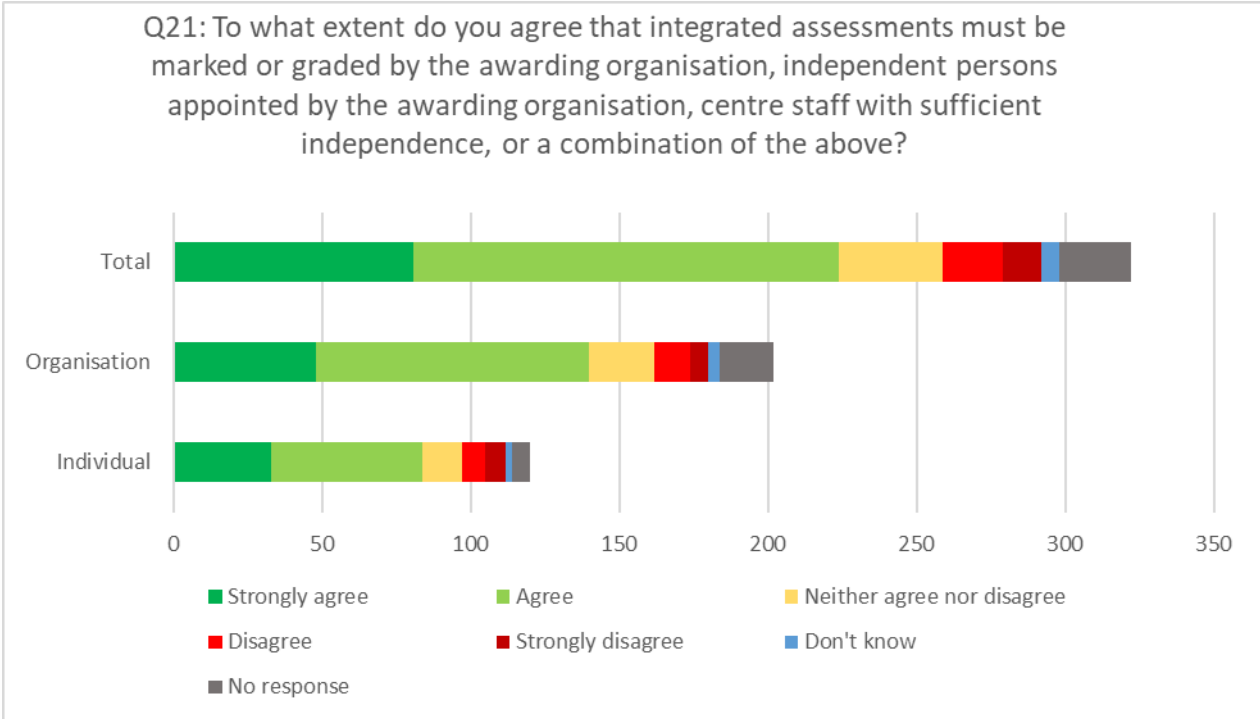
Some respondents expressed that they were unsure of the benefits of our proposal. As with other questions, some respondents said that they disagreed with integration more broadly.

Comments made by respondents who left a comment but did not use the scale to indicate agreement (7% of respondents)

Respondents who left a comment but did not use the scale to indicate agreement noted:

- Robust measures would be required to ensure independence.
- Specific sectors may need consideration, for example where an independent assessor's presence may have an impact on the employer or service user.
- Smaller training providers may not have the volume of staff to implement the proposal, so other approaches such as sharing resource between providers may be necessary.

Question 21: To what extent do you agree that integrated assessments must be marked or graded by the awarding organisation, independent persons appointed by the awarding organisation, centre staff with sufficient independence, or a combination of the above?



Response breakdown	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree	Don't know	No response
Total	25%	44%	11%	6%	4%	2%	7%
Organisation	24%	46%	11%	6%	3%	2%	9%
Individual	28%	43%	11%	7%	6%	2%	5%

Comments made by respondents who either agreed or strongly agreed with our proposal (69% of respondents)

Respondents who agreed or strongly agreed with our proposal thought that it was vital to ensure the independence of the EPA, but that a pragmatic approach might need to be taken in exceptional circumstances. For example where there is a shortage of external assessors. They thought that the approach to marking and grading would be likely to vary between industries, especially where there are regulatory requirements in place.

Respondents felt that our proposal ensured high quality assessment within the structure and realities of current provision, noting the importance of robust moderation and quality assurance processes to ensure valid assessment judgements.

Respondents thought this was especially true where centre staff would be involved in assessment, with some going further to suggest that sufficiently independent centre staff should not be able to mark or grade assessments at all. One respondent felt that our approach would ensure credibility of centre assessment where there might be negative perceptions of tutor-marked assessment. Some respondents thought integrated assessments should be able to be marked by the EPAO.

Some respondents emphasised that the awarding bodies are responsible for the security and quality of their assessments and should have policies in place, including for ensuring robust and valid assessment.

A few respondents noted some impacts on centres and learners. They commented that care would need to be taken to ensure that independence doesn't impact on the timely issue of results. They also highlighted that our proposal was likely to introduce additional assessment costs.

Comments made by respondents who either disagreed or strongly disagreed with our proposal (10% of respondents)

Respondents who disagreed or strongly disagreed thought that centre staff should not be involved in assessment at all, as their independence cannot be assured. Others thought the requirement for independence went too far, and the judgement and integrity of tutors, teachers and lecturers should be trusted. One respondent suggested that employer representatives might be more appropriate than centre staff, as they have a greater interest in apprentice competence and are less likely to allow an apprentice to progress where they have not demonstrated sufficient capability.

Some respondents thought the marking and grading of the qualification's integrated assessment should be the responsibility of the EPAO. However, some responses referred to the marking of the EPA, so it was unclear if respondents thought this proposal might apply more broadly than just to the qualification assessment.

Other respondents commented that internal and external quality assurance measures were sufficient to ensure fair and valid assessment outcomes. Some noted that higher degrees of integration would increase the cost of assessment.

Some respondents disagreed with our proposal because they do not agree with integration more broadly.

Comments made by respondents who neither agreed nor disagreed with our proposal (11% of respondents)

Respondents who neither agreed nor disagreed with our proposal agreed that the awarding body and those appointed by an awarding body should be able to mark or grade assessments, but disagreed with the use of centre staff. One respondent noted that centre staff were unlikely to be sufficiently independent if they had the necessary

subject knowledge to mark or grade an assessment. Some respondents thought the approach would differ depending on the qualification and context, but that it would be preferable for there to be no centre involvement. Others mentioned the importance of awarding bodies to retain oversight of the assessment and quality assurance, especially where centre staff are involved in assessment decisions.

One respondent noted that they agreed with our proposal, but disagreed with integration more broadly, and felt that allowing sufficiently independent centre staff to be involved in assessment decisions was essential.

Some respondents thought that our proposal duplicated the role of EQA, and one respondent thought that independent assessment arrangements for regulated qualifications were already sufficiently covered by Ofqual's General Conditions of Recognition.

Comments made by respondents who selected 'don't know' or who left a comment but did not use the scale to indicate agreement (9% of respondents)

Comments left by respondents who either selected 'don't know' or did not signal agreement with our proposal, pointed to the importance of independence. Two respondents agreed that awarding bodies and persons appointed by an awarding body should mark or grade assessments, but not centre staff. One comment appeared to agree with our proposal.

Question 22: With reference to the General Impact Assessment (Section 4.1), are there any other impacts, including costs, savings or benefits, which we have not identified? Please provide examples, data, or evidence where possible.

Of the 322 survey responses, 110 respondents identified additional impacts or had further comments.

Some respondents referred to impacts which already exist in the system rather than those introduced by our proposals, and some respondents commented on frustrations within the system for which IfATE are not directly responsible. A few comments also referenced level 6 or 7 apprenticeships which are out of scope for this consultation.

Due to the high volume of comments for this question they have been grouped by stakeholder type below.

Apprentices

A large number of respondents raised concerns about how the removal of mandated

qualifications will impact on apprentice progression opportunities (especially in certain sectors) and may also reduce the opportunity for learners to take on higher-level programmes in the future.

A couple of respondents noted that apprentices may be impacted by not achieving their qualification during their programme, since the value of the apprenticeship is not held in the same esteem by the labour market. One respondent suggested that integration might restrict the apprentice's ability to work if some occupations require essential 'licence to practice' qualifications earlier in the apprenticeship.

A number of respondents felt that the proposals could impact apprentice earnings if the award of the qualification and EPA is delayed, especially where professional registration is needed. A couple of respondents suggested that if the EPA completion exceeds the timeframe for regulatory work experience, then apprentices may be disadvantaged in comparison to learners on non-apprentice routes.

Many comments suggested that integration of assessment at EPA could cause assessment anxiety and extra burden, leading to issues with completion. One respondent noted that the 'off-the-job' allowance ceases post-gateway, and that these proposals may disadvantage apprentices where employers do not provide the appropriate support for EPA assessment preparation. Another respondent noted that greater resits would be required if monopolistic behaviour or ongoing changes to assessment practices created poor results for apprentices.

A few respondents also commented on the potential issue of parity between other learners who are taking the qualification and being awarded, compared to apprentices who are taking the same qualification (at the same time) but achieving their final award later. They felt that this could lead to accusations of unfairness.

Employers

A number of respondents felt there is a risk that these proposals will overburden trailblazer employers, and place greater expectations on them which will risk their participation in the programme. A small number of respondents suggested that these proposals would also impact funding band reviews, due to increased costs for delivery.

Other comments on the impacts for employers noted:

- Smaller employers would be disadvantaged.
- Employers would have less choice of EPAOs.
- There may be additional costs or resource implications for the employer if apprentices are on programme longer.
- Integrated EPA could create employer detachment issues.

- Generalised qualifications (due to alignment) would not meet the needs of each sector.
- There may be increased skills gaps due to lack of uptake which will impact on sector productivity.

Some respondents also had concerns that these proposals would impact the number of apprentice starts, with a couple of comments suggesting that these proposals would cause employers to disengage from apprenticeships in general and choose other routes due to a lack of choice caused by the removal of qualifications.

A small number of respondents highlighted the potential impact on the devolved administrations which rely on these qualifications in apprenticeships. They felt that the proposals could lead to a reduction in the pool of available qualifications should they become unviable and withdrawn by awarding organisations.

Awarding organisations

A significant number of respondents felt that there would be considerable impact and burden on the financial and administrative processes for awarding organisations related to qualification re-design, qualification duplication, and the systems and resources needed to support assessment integration.

A large number of respondents made singular and wide-ranging comments which cannot be grouped, but include potential impacts on the following:

- Smaller awarding organisations.
- New entrants to the market.
- Reduced involvement of awarding organisations.
- Commercial and contractual considerations.
- Legislative or regulatory considerations.
- Delays to the overall apprenticeship process.

In addition, a couple of respondents noted the potential impact of the current level 2 and level 3 reforms and qualification reviews on the overall market, with some respondents suggesting that IfATE should consult further with awarding organisations and EPAOs to fully understand the challenges associated with these proposals.

End-point assessment organisations (EPAOs)

A significant number of respondents felt that there would be a considerable impact and burden on the financial and administrative processes for EPAOs.

A few respondents felt the proposals may impact the delay of awarding due to the complexities of administering an integrated EPA. Some also felt that this will increase costs and impact on efficiency. One respondent suggested there would need to be more support and funding to manage the new processes and contractual arrangements.

Some comments suggested that these proposals were unfair to independent EPAOs, and that smaller EPAOs would suffer with additional burden required to support integrated assessments. One respondent noted the potential risk of bundling, which would impact fair and competitive practice in the market.

A small number of respondents noted that there is already a distinct lack of independent assessors available and that these proposals may impact that further.

Some respondents felt that the impact of these proposals will undermine the value of EPA, by suggesting the qualification is more important.

Training providers

Several respondents felt that the training providers roles and responsibilities will need to be clarified since they are likely to be increased, leading to resource and cost implications. Some of the impacts leading to further costs were identified as:

- Supporting apprentices and employers through EPA.
- Waiting for certificates to be released by awarding organisations.
- Running two programmes alongside each other if duplicated or for non-apprentice learners.
- Availability of qualifications if awarding organisations cease to offer them.
- Decreased recruitment numbers due to less attractive programmes.

A couple of respondents noted that these proposals will impact providers ability to create curriculum plans without the depth of detail from the qualification's learning outcomes, which would affect training quality.

Question 23: With reference to the General Impact Assessment (Section 4.1), are there any additional steps that could be taken to mitigate any negative impact, resulting from the proposed approach to approvals? Please provide examples, data, or evidence where possible.

Of the 322 responses to this consultation, 78 provided further comments to this question which either agreed that the impact assessment is suitably comprehensive, or suggested additional steps that could be taken to mitigate any negative impacts.

Some respondents suggested it would be important to work alongside any other qualification reforms taking place to ensure clarity and reduce conflicting priorities for awarding organisations. They felt there will need to be appropriate consideration of the timeline to implement these proposals, to provide sufficient allowance for awarding organisations and EPAOs to map their qualifications.

Some comments highlighted the need for consideration of all stakeholder timelines when both introducing the policy and setting the duration of the apprenticeship. Respondents noted that for certain employment contracts and professional registration requirements, the integrated EPA would need to take place at a time within the contract which would allow for the awarding of the certificate. They felt this would also mitigate any unnecessary extensions to the apprenticeship itself.

Several respondents suggested there would need to be a wider and more inclusive variance of stakeholders involved in the trailblazer group. They felt that collective working would be imperative to support assessment design, alignment, and planning. Many comments noted the increased burden on trailblazers, and to help reduce this suggested the following:

- Allowing previous examples of collated evidence.
- A consistent approach to approvals.
- Robust guidance.
- Showcasing best examples for employers and relationship managers.
- A streamlined review process to keep pace with the changes employers and sectors are facing.

A few respondents noted the importance of professional bodies being flexible and innovative to ensure they meet employer needs, and to support this they felt that a mandated qualification's KSBs should not be too descriptive or detailed.

Regarding funding, a number of respondents felt that to mitigate any negative impacts of the proposals funding bands should be reviewed in line with inflation and likely increased costs to deliver integrated assessments. One respondent suggested that each change in terms of integrated assessment should be risk assessed and the cost borne by awarding organisations, government, or IfATE in the first instance.

Many respondents felt that for all stakeholders to embed the changes there would need to be a reasonable period of adjustment that included:

- Clear expectations of all stakeholders.
- A joined-up approach from Ofqual, IfATE and ESFA.
- Good transparent communication.

A few respondents proposed that delaying the award of the qualification until after the learner has passed the apprenticeship would be an alternative to integration.

Some comments made reference to incentivisation as a proposed solution to mitigate any negative impacts. These suggestions included:

- Support for employers to provide sufficient 'off-the-job' time for assessment preparation.
- Financial support for awarding organisations to commit to occupational standards with low industry numbers.
- Allowing trailblazer employers to off-set some of their levy to compensate the increased workload.
- Support for training providers when changes are made to qualifications.
- Stricter rules or penalties for employers or apprentices who withdraw after the qualification is achieved.

There were a few other one-off comments which could not be grouped thematically but are listed here for information:

- Ensuring the assessment process is inclusive and respects different cultures.
- The EPAO and awarding organisation should be the same organisation to reduce administrative complication.
- Full and in-depth audits across all organisations to enable checking of all parts and stakeholders involved in apprenticeship delivery.
- Consideration of impacts on a standard-by-standard basis and determined by the needs of each sector.
- A focus on tightening the criteria on sectors where this is causing an issue only.
- Improved on-boarding processes with a full induction to the EPA and what is included.
- An apprentice commitment to completing the full programme inclusive of the EPA.
- To only review occupational standards once the new policy is in place to prevent

unnecessary burden.

- To trial the approach more thoroughly and only roll-out once assured it will work for all apprenticeships.

It is worth noting that a few respondents felt that to mitigate any negative impact the whole policy should be reconsidered. They felt that mandatory qualifications support and strengthen apprenticeship programmes and that their removal would be devastating.

Question 24: With reference to the Equality Impact Assessment (Section 4.2), are there any other potential impacts (positive or negative) that have not been identified? Please provide examples, data, or evidence where possible.

Of the 322 responses to this consultation, 55 provided further comments to this question, with some confirming their agreement with the potential impacts identified.

Some respondents referenced impacts which have already been suggested in previous questions, and a few made comments or noted impacts which already exist in the system or are out of scope for this consultation.

In addition to potential impacts highlighted previously, a few respondents suggested that the removal of mandated qualifications will have a negative impact on apprentice equity, diversity and social mobility. With one respondent noting IfATE's responsibilities for widening participation and levelling up, especially if qualifications are removed which would usually support learners from lower socio-economic groups.

A couple of respondents commented on the risk that if professional bodies were to disengage with apprenticeships or cease delivery of a mandated qualification that is part of an integrated assessment, then apprentice completions and future progression opportunities would be impacted.

A few respondents suggested that the proposals would introduce more conflict of interest into an already vulnerable market, and that impacts of this should be further considered.

A couple of respondents noted the potential impact on learners with additional needs and felt there could be inconsistencies in approaches to dealing with reasonable adjustments for learners, especially when there are multiple parties involved in the integrated assessment.

A couple of respondents suggested that if the qualification is integrated into EPA and

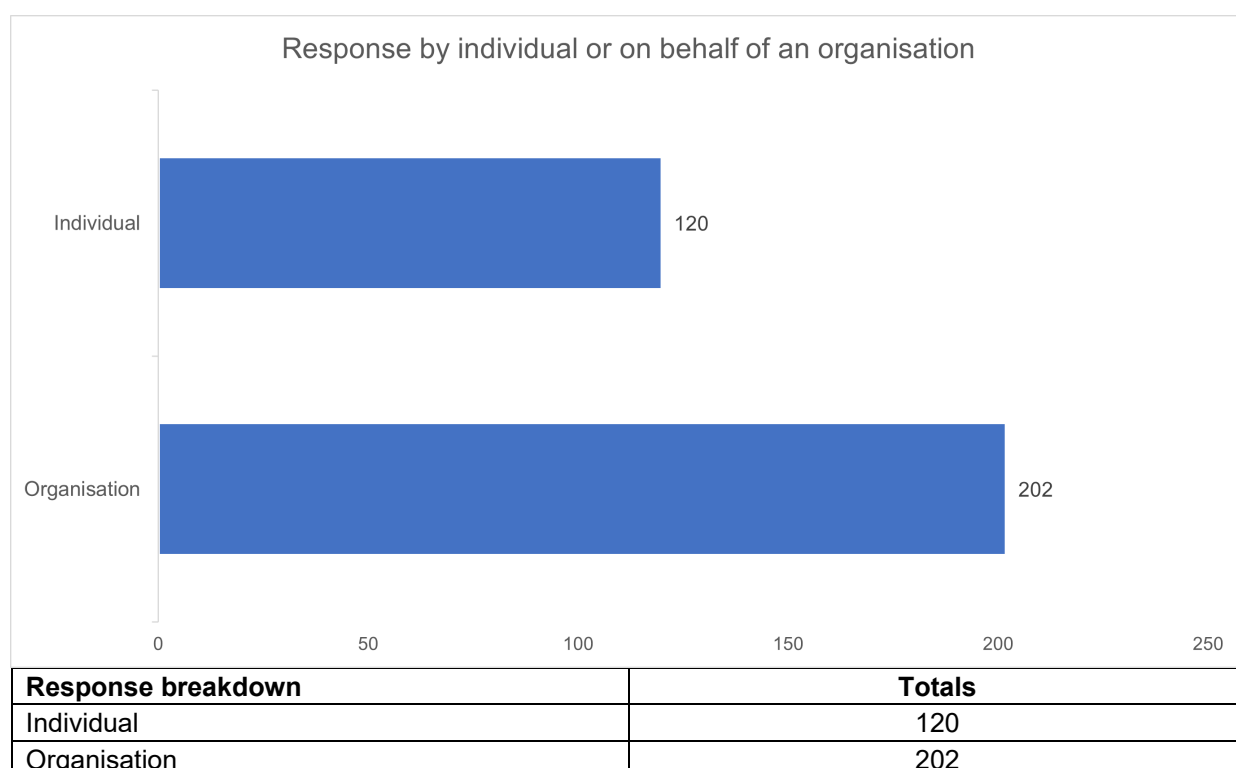
the apprentice passes the qualification but fails the EPA, then they could leave with no achievements and this would disadvantage the learner.

One respondent commented on the positive impact the proposals will have on apprentice withdrawal rates, and that the proposals will also ensure employers are not using the levy funding as a steppingstone to gain certain qualifications.

6. Annex A: Detailed respondent analysis

The consultation generated 322 responses via the online survey, and six responses via the consultation mailbox. Respondents included a range of individuals and organisations, and participation in the consultation was on a self-selecting basis. A breakdown of the 322 online survey respondents by category is set out below.

Response by individual or organisation



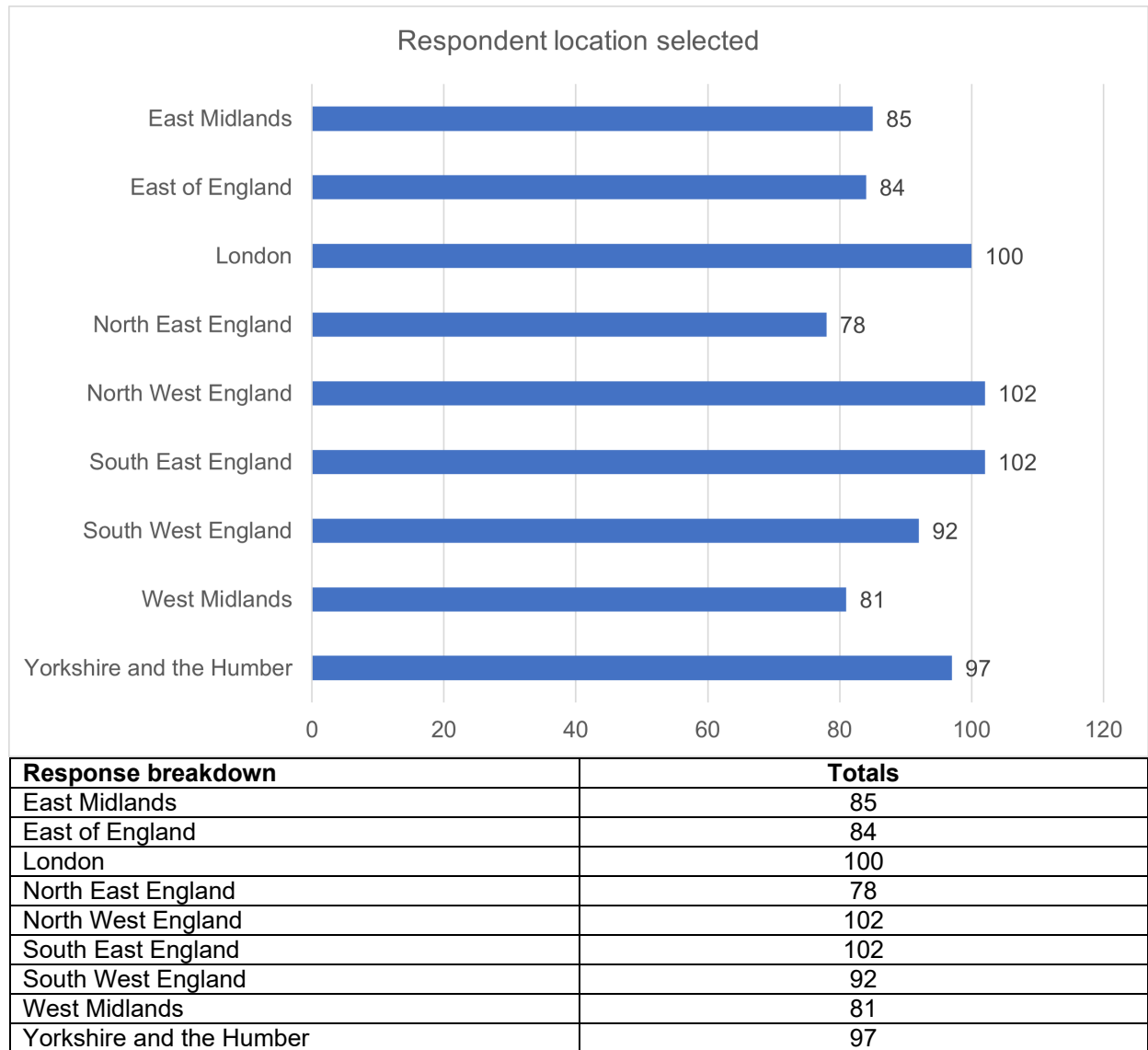
Response by stakeholder type



Response breakdown	Totals
Apprentice	10
Awarding body	14
Education or training provider	77
Employer	79
End-point assessment organisation	34
Industry group	12
Other	22
Other representative or interest group	15
Professional body	19
Tutors, assessment staff and other representatives from apprenticeship and training providers	40

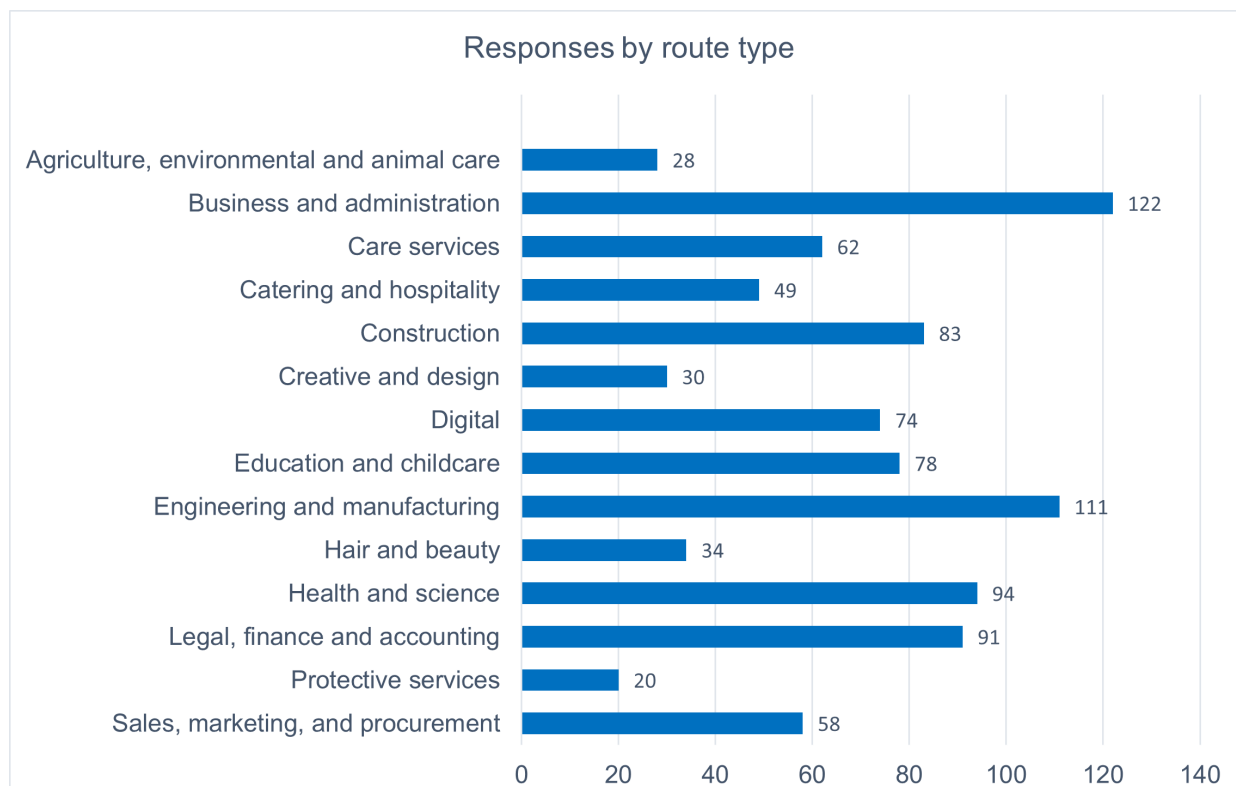
Response by location

Respondents could select more than one option for the question ‘Which region of England are you or your organisation based?’ which is why the percentages below do not sum to 100. However, there is no double counting in the total number of responses.



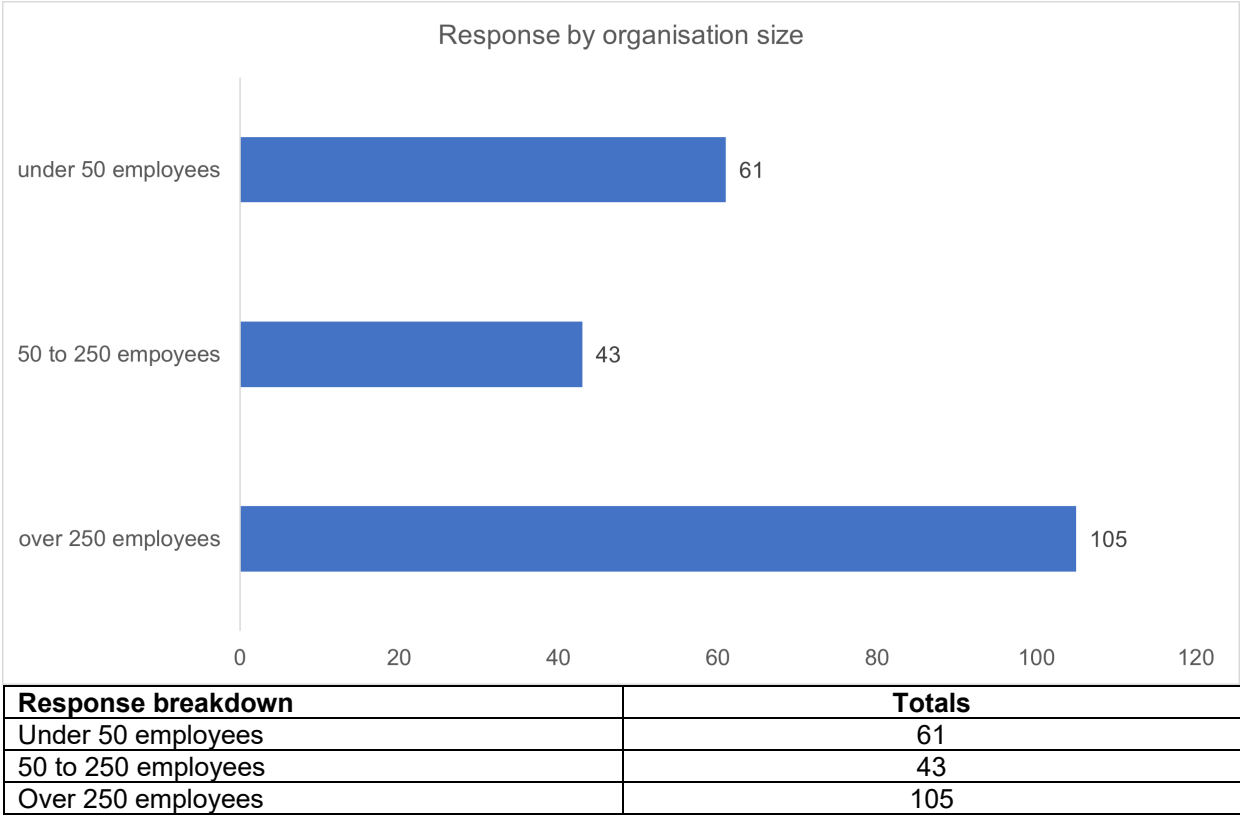
Response by route type

Respondents could select more than one option for the question ‘Which occupational routes are you or your organisation involved with?’ which is why the numbers below do not sum to 322. However, there is no double counting in the total number of responses.



Response breakdown	Totals
Agriculture, environmental and animal care	28
Business and administration	122
Care services	62
Catering and hospitality	49
Construction	83
Creative and design	30
Digital	74
Education and childcare	78
Engineering and manufacturing	111
Hair and beauty	34
Health and science	94
Legal, finance and accounting	91
Protective services	20
Sales, marketing and procurement	58

Response by organisation size



Stakeholder engagement events

There were six webinars during the consultation and the breakdown of attendance at these is as follows;



Attendance breakdown	Totals
Apprentices	21
Awarding organisation and end-point assessment organisations	31
Education and training providers	16
Route panel members	14
Trailblazers and employers	103

List of organisations

Below is a list of organisations that provided a written response, where respondents indicated they were happy for their organisation's name to be included.

Academy4PM
 Active IQ
 Advanced Therapy Apprenticeship Community (ATAC)
 AELP - Association of Employment and Learning Providers
 Apex Consultants
 APM
 Ark Teacher Training
 Association of Accountant Technicians (AAT)
 Association of Apprentices
 Association of Chartered Certified Accountants (ACCA)
 Association of Colleges
 Association of Pharmacy Technicians UK
 AstraZeneca
 BAE Systems Plc
 Banham Academy
 Barnett Waddingham
 BCS, The Chartered Institute for IT
 Belron UK (Autoglass)

Best Practice Network
Blackburn College
BPP Education Group
Bradford College
Breedon Group
British Institute of Non-Destructive Testing
Brooklands College
Buildskill Plus
Cambridgeshire and Peterborough Combined Authority
Career Development Professional Higher Apprenticeship EPAO - Suffolk County Council
Caretech
Carlisle City Council
CEMEX
Chartered Association of Business Schools
Chartered Institute for the Management of Sport & Physical Activity (CIMSPA)
Chartered Institute of Building
Chartered Institute of Credit Management (CICM)
Chartered Institute of Housing
Chartered Institute of Internal Auditors
Chartered Institute of Personnel and Development
Chartered Institute of Plumbing and Heating Engineering
Chartered Institute of Procurement and Supply
Chartered Management Institute
Choice Support
CILEX
CILEX Law School
CILEX Regulation
CIMA (Chartered Institute of Management Accountants)
CIOB
CIPS Corporate Services Ltd
City & County Healthcare Group
City & Guilds
City College Norwich
Colchester Zoo
CompTIA
Construction EPA Company
Construction Skills Certification Scheme (CSCS)
Co-op
Corndel
Cornwall Partnership NHS Foundation Trust
Crown Vocational Training
Davies
Derby College Group
Derwent Training Association
Diamond People (NE) Ltd trading as Tyneside Training Services
DSW
DVSA (Driver & Vehicle Standards Agency)
DWP
EAL Awarding
Early Years Alliance
EAS Mechanical Limited
East Suffolk & North Essex NHS Foundation Trust
ECITB
ELA Training
Energy & Utility Skills
Enginuity
Exeter College
EY

FDQ
First Intuition Cambridge Limited
First Intuition Ltd
GMCA
GQA Qualifications
GSK
GTA England
Hanson UK
Health Education England, Pharmacy Team
Hidden Hearing
Highfield Qualifications
HOP Consulting Ltd
Innovate Awarding
Institute of Biomedical Science
Institute of Financial Accountants
Institution of Civil Engineers
International Compliance Association
Intraresilience Limited
Irwin Mitchell
JTL
Kaplan Financial Ltd
Keoghs LLP
KraftHeinz
Landex
Lantra
Leeds City College
Leeds College of Building
Lift and Escalator Industry Association
London Ambulance Service NHS Trust
London South East College
LRTT Ltd
Mace Group
Make UK
Maritime Skills Alliance
Michael Christopher Training
Ministry of Justice
National Council for Training Journalists (NCTJ)
National Electrotechnical Training (NET)
National Examining Board for Dental Nurses
National Hair and Beauty Federation (NHBF)
National Nuclear Laboratory
National School of Healthcare Science
National Skills Academy for Nuclear (NSAN)
National Skills Academy for Rail
Natwest Group
NCFE
Network Rail
Newcastle Hospital NHS Foundation Trust
NFEC National Forum of Engineering Centres
NHS Employers
Northampton College
Northern & Yorkshire NHS Assessment Centre
Northern Lincolnshire and Goole NHS Foundation Trust
Northumberland County Council
Nuclear Skills Strategy Group
Occupational Awards Limited
Open Awards
Pearson Education Ltd

Pfizer Ltd
Pharmacy Workforce Development South
PowersUK Ltd
Professional Assessment Ltd (PAL)
Qualsafe awards
RAF Apprenticeship Centre
Rail Forum
Realise Learning & Employment
RELX (UK) Limited
Royal Botanic Gardens, Kew
Royal College of Veterinary Surgeons
Royal Navy
Royal Society of Chemistry
Salford City College
Science Industry Assessment Services Ltd
Science Industry Partnership
SFJ Awards Ltd
SGN
Sofina
SS Educational Services Ltd
St Helens College
Sterling Pharma Solutions Limited
Summit Qualifications UK
Technical Apprenticeship Consortium (TAC)
The Association of Accounting Technicians (AAT)
The Chartered Institute for Securities & Investment
The London Institute of Banking & Finance
The Open University
The Procurement Academy
The St Martin's Group
Toyota Manufacturing (UK) Ltd
Training Qualifications UK
TUoS
Turning Point
Tyne Coast College
Unity Works Social Enterprises
University of Exeter
VINCI PLC
Vistar Qualifications Limited
Wilson & Roe, High Court Enforcement
Wiltshire College
Wiltshire College and University Centre
Wiltshire Council
WM Morrisons Supermarkets Ltd

Institute for Apprenticeships and Technical Education
Sanctuary Buildings, London SW1P 3BT
Cheylesmore House, 5 Quinton Rd, Coventry CV1 2WT