

11 March 2020

Degree apprenticeship review 2019-20

Executive Summary

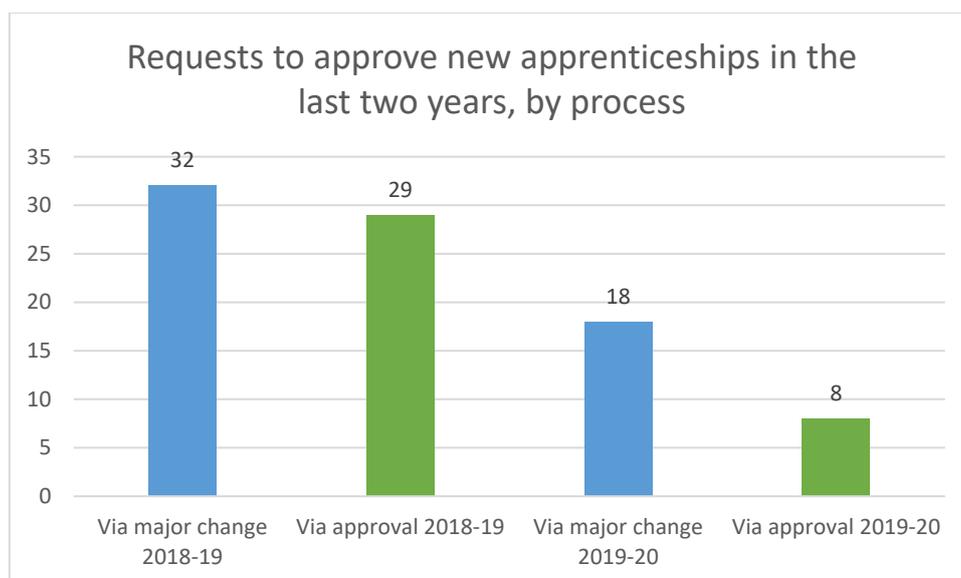
The purpose of this paper is to:

- Provide an overview of the Department's quality assurance work with degree apprenticeship programmes during the 2019-20 academic year, and a comparative review of the last three full academic years.
- Provide recommendations for the Department's future engagement with quality assurance of degree apprenticeship programmes.
- Provide an opportunity for discussion and any questions.

Previous consideration	Reviewing our approach to quality assuring Higher and Degree Apprenticeships – dealing with initial work with degree apprenticeships in 2017-18 Reviewing our approach to quality assuring Higher and Degree Apprenticeships from 2018-19
Decision	The Committee is asked to note the report
Next steps	Executive to arrange proposed activity.
Strategic priority	Continuously improve and innovate Promote high quality professional practice Develop insight and exert influence
Financial and resource implications	Costs of development work included in 2020-21 budget.
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Reviewing our continued approach to quality assuring Higher and Degree Apprenticeships

1. This report follows those which looked at the 2017-18 and 2018-19 academic years. Previous reports, particularly the 2017-18 report which considered our first year of assessing degree apprenticeship programmes, emphasised the need to be flexible and take a case-based approach to our assessment methods.
2. When informed of degree apprenticeship proposals, we made individual decisions based on factors such as whether and to what extent the proposed degree apprenticeship would differ from any existing approved programme.
3. In deciding how to review individual apprenticeships the Executive considered that the integrity and effectiveness of our processes could be maintained while avoiding unnecessary regulatory burden on our education provider partners, and disproportionate costs on the HCPC itself.
4. The normal approval process was used where an education provider had developed an apprenticeship programme from scratch, i.e. if they did not have an existing approved programme in the relevant profession. The normal process involved a six month lead-in as well as the standard post-visit process which normally takes around three months. In these situations the normal stipulations apply about approval needing to be in place before applicants can enrol in the programme. We would use the major change process if the proposed apprenticeship was closely modelled on an existing programme and had few significant differences from the approved programme, allowing for the different structural requirements of apprenticeships.
5. There was a noticeable reduction during the 2019-20 academic year in requests to approve apprenticeships through the major change process (18) and through the approvals process (8). For 2018-19 the equivalent figures were 32 and 29 respectively. The reason for this may be that apprenticeships are now an established part of the landscape and so some of the initial high take-up has declined. Many of the institutions which were going to launch apprenticeships have done so already.



6. Additionally, during the 2019-20 academic year, the HCPC ceased to be the statutory regulator for Social workers in England. Social work degree apprenticeships had formed a large part of the apprenticeship work during the previous two academic years. In 2017-18, 15 out of 26 requests to approve apprenticeships were for social work programmes (58 per cent), and in 2018-19, the equivalent figure was 30 out of 53 (57 per cent). This may explain the reduction noted above. However, other professions regulated by the HCPC have been pushing forward apprenticeships.

Major change

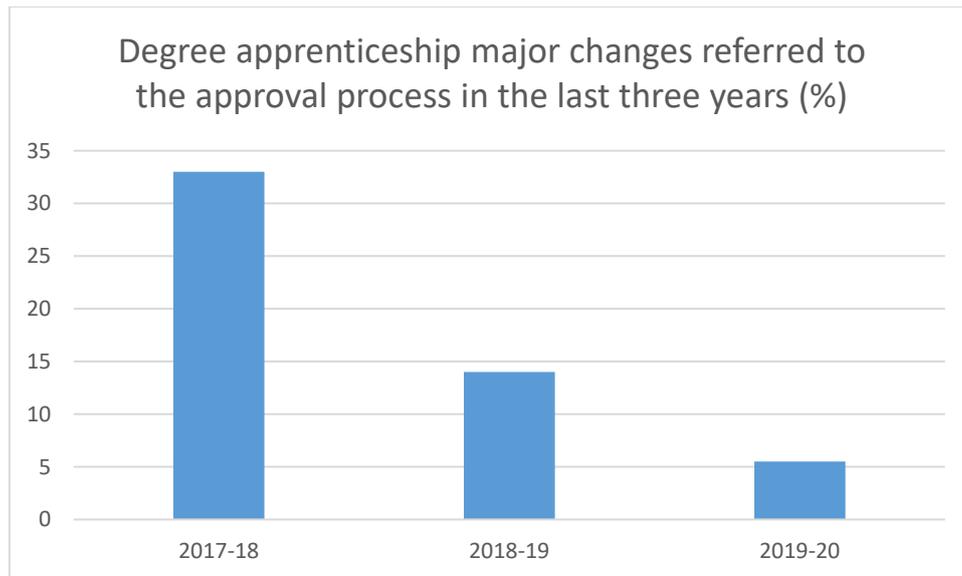
7. The table below summarises the data and outcomes associated with the submitted major changes for degree apprenticeship programmes in the last year.

Table showing various data and outcomes in apprenticeship major changes

	Number of cases	Notes
Initial submission and Executive review		
Apprenticeship major change notification requests received	18	
Referred to approval directly from major change notification review	1	
Referred to major change process	17	
Education provider withdrew during the process		
Education provider withdrew the proposal before documentary submission stage	3	

Education provider withdrew after first documentary submission but before visitors had made a recommendation	2	
Visitors reached a final recommendation		
Cases where visitors made a final recommendation	12	
Cases where visitors recommended approval after completion of major change process	1	ETCP agreed visit recommendation 12 Nov 2020. Visit taking place in April 2021. The visitors were not satisfied with the sustainability, resourcing and practice-based learning on the programme
Cases where visitors recommended approval of an apprenticeship after completion of major change process	11	
Cases where additional documentation was requested and a final recommendation was made	7	
Cases where visitors requested additional documentation after viewing an initial submission	9	In two of these cases the education provider withdrew after receiving a request for further documentation
Cases where visitors recommended approval after an additional evidence request	6	This figure takes into account the two withdrawals noted above and the one case where a visit was recommended
Cases where visitors recommended approval based on the initial submission	5	

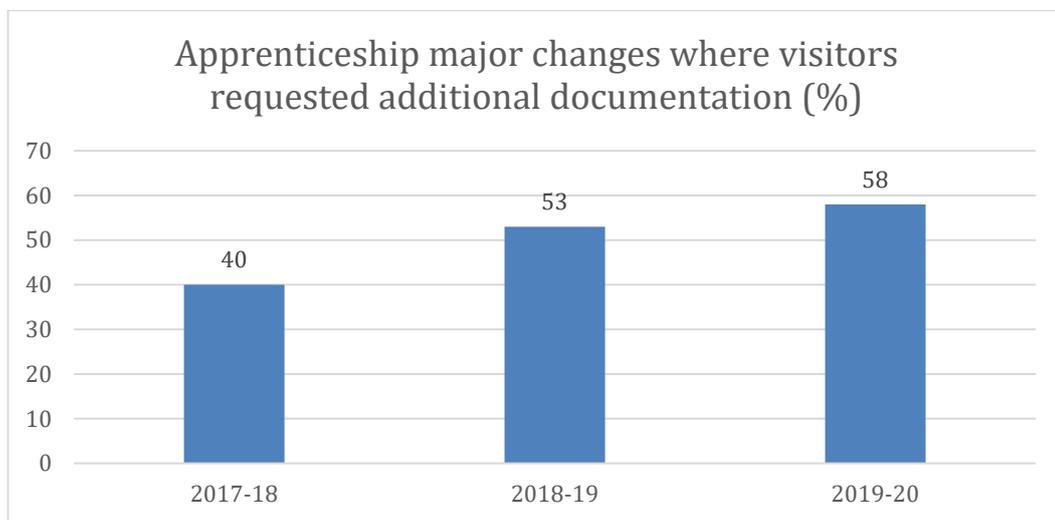
8. Only one out of the 18 requests that came to us through the major change process was reviewed through the approval process after initial assessment by the Executive (5.5 per cent). This is a noticeable decline from the previous two years. It is comparable to the figure for all major changes in 2019-20 (3 per cent), but comparisons are difficult because of the low actual numbers.



9. As shown in the graph above, in 2017-18 one third of major changes requesting an apprenticeship were referred to the approval process. In 2018-19, 14 per cent were referred to the approval process. The downward trend is likely due to changed expectations in the Executive around the general principles for assessment, and what would constitute the most reasonable and proportionate approach. As discussed elsewhere in this report, the available data supports our decision to adopt these general principles.
10. As table shows, five cases were cancelled at various stages. This was due to education providers determining that they were not ready to proceed, or because of delays due to the COVID-19 pandemic. Three of the withdrawn cases were from one education provider, so this may be reflective of particular institutional circumstances.
11. In the nine cases where additional documents were requested, a total of 61 standards were cited, which is an average of almost seven per report. Strikingly, these were heavily concentrated in the two cases where the education provider withdrew from the process (10 standards and 14 standards respectively) or where the visitors recommended a visit (10 standards). More than half (34) of all the extra documentation requests were made in these three cases.
12. In the cases where additional documentation was requested, and a final recommendation of approval was made, the average number of standards in respect to which further evidence was requested was between four and five. 27 standards were cited across six reports, although more than half of these (14) appeared in one single report.
13. The average number of additional documentation requests in the previous year, 2018-19 was seven, or four if you remove one education provider whose programmes received a particular large number of requests. This suggests that the assessment of apprenticeships through major change is

largely stable across time, and that there are not significant disparities in assessment across different visitors, Education Officers or institutions.

14. Twelve cases in total went through the full major change process. Of these seven (58 per cent) required additional documentation. This is broadly equivalent to the figure for 2018-19 (53 per cent) and rather higher than 2017-18 (40 per cent). There is a noticeable upward trend here – especially if we include all cases where additional documents were requested rather than just cases reaching the visitor recommendation stage (the figure for all cases is 64 per cent, i.e. nine out of 14 cases, see the table above). It should be viewed in the context of the steep decline in the number of apprenticeship requests made through major change being referred to the approval process at the initial stage (see paragraphs 8 above, and 15 below).



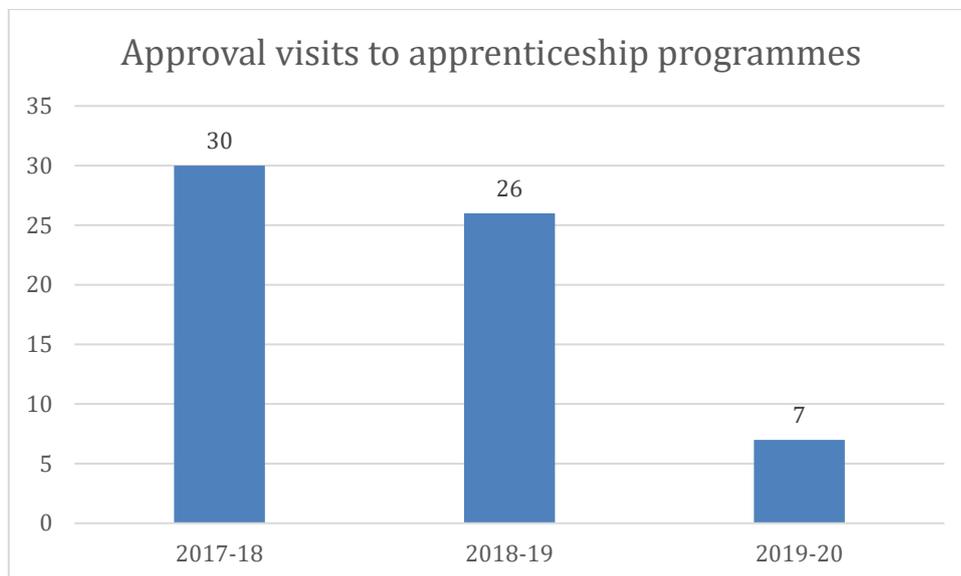
15. It would appear that the Executive is considering more apprenticeship programmes through the major change process, and so handling more complex work. The available data suggests that we are able to handle this work through the documentary process. This is shown by the fact that only one of the major change apprenticeship cases ended in the visitors recommending an approval visit. This supports the policy decision to use the major change process to review most apprenticeship requests, as a way of balancing the need for appropriate risk-based scrutiny with the need for proportionate and cost-effective regulation (see paragraphs 2-4 above).
16. Previous years' apprenticeship reports have stressed the need to give clear guidance about the evidence required as part of a degree apprenticeship submission. Given the continuing high number of cases in which additional documentation is requested, it may be that we need to review this information and provide more explicit guidance on how we expect education providers to demonstrate that their apprenticeship programmes will meet the standards.
17. It is not necessarily problematic for degree apprenticeship programmes going through the major change process to be more complex on average than standard major changes. However, it would be useful for both the HCPC and

all stakeholders if there were ways of reducing the number of cases where we require additional documentation.

18. In general, looking at the processes by which we assess apprenticeships through major change, there do not appear to be major issues. Visitors in non-apprenticeship major changes are much less likely to request additional documents (41 per cent of all major changes required additional documents in 2019-20).
19. However, degree apprenticeship major changes take less time to reach a final recommendation than non-apprenticeship major changes. During 2020 the median time taken to reach a recommendation in all major change cases was 2.8 months. For major change apprenticeships the median time to reach a recommendation was 2.1 months. The mean average for apprenticeship cases was a little higher (2.7 months) due to a number of cases that took significantly longer than the 3 month key performance indicator. Regarding comparisons with apprenticeship cases in previous years, the report for 2018-19 did not capture this detail.

Approval process

20. 2019-20 saw a significant reduction in approval visits to apprenticeship programmes. Seven approval visits took place to degree apprenticeship programmes (one was due to take place but was cancelled at the education provider's request). This compares with 26 in 2018-19 and 30 in 2017-18.



21. This is due to a reduction in the number of cases being referred out of the major change process, which is a continuing trend across all the three years of apprenticeship reviews, but also likely because the HCPC no longer regulates Social workers in England. This would have meant that social work education providers were no longer coming to us to approve their apprenticeships, which had made up a significant part of the apprenticeship approval caseload during 2017-18 and 2018-19.

22. The average number of conditions set on these visits was 12 (84 standards across seven visits). However, this figure is significantly affected by two high-condition reports, which had 23 and 20 conditions respectively. The other five cases had an average of only eight conditions each. Visitors eventually recommended approval in all seven cases, and in four the conditions were met at the first attempt.
23. This average number of conditions is higher than the average for the previous two years (in 2018-19 the average was 10 and in 2017-18 it was 9). However, as already noted, without the two high-condition reports the average was eight, which is lower than the previous years. It is also comparable with the average for all approval cases in 2019-20, which was slightly below nine.
24. Degree apprenticeship approval cases took somewhat longer on average from visit date to final visitors' decision than other approval visits. The average for all completed approval visits in 2019-20 was 96 days. Degree apprenticeships took an average of 121 days. This difference may reflect additional complexity in degree apprenticeship approvals, although the average is also affected by two exceptionally long cases that each took almost six months, including the case involving a revisit mentioned in paragraph 26 below. Without those two cases the average is just over 100 days, comparable to the figure for non-apprenticeship approvals. By the nature of our assessment of apprenticeship programmes through the major change process, any which go to approvals are more likely to be complex in any case. Previous year's reports did not carry data on how long apprenticeship approvals took.
25. Only one apprenticeship visit was cancelled in 2019-20. This was at the education provider's request.
26. In one case a follow-up visit was scheduled as a way of demonstrating how conditions were met. This was due to visitors' concerns about learners being enabled to meet the standards of conduct, performance and ethics, and the decision that these would most appropriately be addressed by further discussions with certain groups. The visitors recommended approval subsequent to this revisit.

Issues arising in approvals and major changes

27. Looking at degree apprenticeship reviews from 2019-20, the issues that have tended to recur when visitors are making decisions about how apprenticeship programmes meet HCPC standards are the same as those which have appeared in reports over the last three years.
28. There are some exceptions where issues which have recurred in previous years but have not appeared in 2019-20. An example is the visitors concern around assessment, especially the workings and integration of End Point Assessments. This may reflect a stronger and increased understanding of

assessment in general and EPAs in particular among visitors and the HCPC Executive after several years of HCPC work around apprenticeships.

29. The following is a summary of the themes that have tended to arise across all three years of degree apprenticeships

Overall leadership and sustainability

30. This theme includes questions regarding how the programme is organised and administered at a senior level, how senior leadership from education providers create and sustain relationships with stakeholders, and how the operation of the programme is effectively supported.

31. Visitors in approval and major change cases across all three years requested further evidence about:

- The development and maintenance of formal relationships between education providers, apprentices, employers and other stakeholders;
- The rationale and demand for apprenticeship programmes in specific areas; and
- Who had responsibility for apprentices' quality of experience, learning achievement, and health and wellbeing while they were with the employer.

32. In general, the approach taken by visitors when considering these issues was to consider evidence such as draft working arrangements and tender agreements, with the understanding that the HCPC should be approached if there were substantial changes.

33. It is likely that visitors tend to seek further evidence in respect to these areas because they are crucial to the effective running of an apprenticeship. Without clearly defined strategic relationships, an understanding of local conditions, and clear definitions of responsibility, apprenticeships will not function as intended.

Operational management

34. This includes issues relating to the day-to-day functioning and administration of the programme, including teaching and learning activities, and the quality of the learner experience.

35. All of the following areas appeared as key themes in approval and major change reports from across the three years of apprenticeship assessment:

- Lines of communication and accountability between apprentices, employer partners and education providers;
- Understanding of programme requirements among those involved in employer placements; and
- The status of apprentices during their programme, i.e. their employment position and the expectations of them from both the education provider and employers.

36. As with the high-level leadership issues mentioned above, there are likely reasons for visitors' continuing focus on these areas. Apprenticeships require particularly strong co-operation between education providers and employer partners on a routine basis to deliver the programme effectively, to address problems in a timely manner, and to support apprentices. The fact that apprentices are also employees in these programmes can affect the dynamics of assessment, and the mechanisms for raising concerns and accessing wellbeing support.

Programme resources

37. Resourcing of programmes includes not just physical and e-learning resources but also staffing arrangements and access to resources for those who may require it.

38. Throughout the three years, these were the key issues arising in apprenticeship assessments, both through the major change and approval processes:

- Apprentices' ability to access programme resources and/or health and wellbeing resources while in employer settings; and
- Employer partners' understanding of their specific responsibilities as regards accessible resources, and appropriate staffing levels.

39. Visitors' focus on these areas is to be expected given that the logistics of apprenticeship programmes – in terms of where apprentices are located and how often they are on site at an education provider – are different to other HCPC approved programmes. HCPC panels are therefore likely to want to explore these issues and ensure that both the HCPC and the various stakeholders have a clear understanding.

Curriculum and assessment

40. This area includes the assessment approach taken by education providers and employers, and the allocation of assessment responsibilities between them.

41. The key recurring issue in this area, across all three years and in both major change and approval, has been visitors' desire to be certain that those carrying out assessment in placement and in employer settings were prepared and qualified to do so.

42. The need for further evidence or more clarity regarding assessment is likely a result of apprenticeships tending to have a model for assessment that differs from other programmes, i.e. with supervising staff in employer settings often having a more expansive role. Education providers are perhaps more used to the conventional practice educator role.

Future indications

43. Almost all professions regulated by the HCPC are now approved for apprenticeship standards. As of early February 2021, the clinical scientist apprenticeship standard has been approved by the Institute for Apprenticeships and Technical Education (IATA) but a suitable End Point Assessment Organisation (EPAO) has yet to be appointed.
44. There are professions that have IATA standard approval but where no apprenticeships are yet in place – arts therapists, dietitians, and speech and language therapists.
45. However, the key theme of apprenticeships is that they are becoming more commonplace and mainstream across all professions and education providers. The Executive has made a policy decision that it is broadly appropriate and proportionate to use the major change process to assess new degree apprenticeships unless there is an indication that a particular case will be more complex. Examples of such indications include:
 - If there is no history at an institution of a particular profession; or
 - If the education provider is itself new to HCPC-regulated professions.

Conclusions and recommendations

46. Looking across the three full years in which we have been assessing apprenticeship programmes, it would appear that we have made significant advances in the way we carry out such assessments.
47. For example, in adapting the general principles by which we assessed apprenticeships we maintained the integrity of our assessment and our processes while avoiding a disproportionate and undue burden on our education provider partners, and imposing unnecessary costs on the HCPC itself through lower visitor fees and staff time.
48. Based on the analysis of both 2019-20 and a comparison across all three years, there is no reason to believe that these general principles are not serving our purposes. We have not received negative feedback from education providers about this approach to taking a proportionate response to the risk involved. Anecdotally, some visitors have expressed concerns to the Executive that the major change process is not an appropriate means of assessing degree apprenticeships, but as noted through this report there are means available by which the risks involved can be managed. Education providers have shown that they are able to submit appropriate evidence to demonstrate that they continue to meet the standards.

Recommendations

1. Encourage Education Officers to focus on communications with education providers in the early stages of degree apprenticeships, to ensure education providers have a clear understanding of submission requirements, and reduce the number of additional documentation requests.
2. Use the findings noted above around ongoing themes in apprenticeship assessment to focus Executives' and visitors' work on areas likely to need attention.
3. Consider proactive communication updates for education providers around the best way to evidence such cases and what they can expect in the process. This is especially important in light of the still considerable number of withdrawals from major change assessment processes, and the continuing uncertainty around COVID-19 and its impact on programmes and institutions.
4. Continue to carefully and regularly monitor the number and type of apprenticeship programme approval requests so that we have a clear idea of that area of work as we go into the new quality assurance regime in 2021-22.
5. Investigate and understand why there has been relatively little take-up of apprenticeship programmes even in those professions where IATA has approved an apprenticeship standard.