

IfATE, Mandatory Qualification Criteria

Introduction

Enginuity's response was submitted via an [online survey](#).

Questions

Q1: To what extent do you agree that qualifications should only be mandated where they fulfil a regulatory, professional body, or labour market requirement?

[See response to Question 2.](#)

Q2: 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?

[Disagree](#)

[We disagree with the proposal that qualifications which provide 'fuller occupational coverage' or 'structure for off-the-job training' should not be mandated on this basis alone. Qualifications of this type should be mandated if they provide skills which are significantly useful to the apprentice in performing the occupation or equip the apprentice with essential transferable skills. Jobs are changing more rapidly than they did in the past, with the introduction of new technology and more rapid transitions from legacy to emerging industries. It is vital that we ensure apprentices are equipped with the skills and knowledge to navigate this changing labour market and take advantage of upskilling and reskilling over the course of their careers.](#)

Q3: 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?

[No response.](#)

Q4: 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.

[Neither agree nor disagree](#)

[If this proposal is adopted, we would prefer a flexible approach. Labour market demand can be challenging to measure, and there is the danger of creating an unintended barrier if actual demand cannot be evidenced in a prescribed manner. It is also important to consider any additional burden on employers and AOs in assessing the impact of this proposal.](#)

Q5: 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?

[No response.](#)

Q6: To what extent do you agree that a qualification mandate should specify exactly which qualifications can be used to fulfil the mandate?

[Strongly agree](#)

We would appreciate further detail on the intended process for specifying mandated qualifications for standards already in delivery.

Q7: To what extent do you agree that qualifications should align with, and not go wider than, the KSBs set out in the occupational standard?

Disagree

Mandated qualifications must fully cover the KSBs. However, there would need to be some flexibility with respect to qualifications that are wider than the KSBs to avoid limiting the quality and range of qualifications available.

Q8: To what extent do you agree that mandated qualifications should be at the same or lower level as the apprenticeship?

No response.

Q9: To what extent do you agree that where possible, a qualification should be integrated into the EPA?

Agree

We would welcome further information on how this process would work in practice. The process should also be piloted more widely to ensure it is effective across a range of different sectors and types of qualifications. Care should also be taken to avoid over-complicating the process which may lead to unintended negative outcomes for learners. In particular, the implications of a process which allowed the AO and EPAO to be different parties should be carefully considered and piloted successfully before wider introduction.

The proposal must additionally not lead to inequitable outcomes for learners taking the qualification as part of an apprenticeship and those studying the qualification outside an apprenticeship.

Q10: 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?

As the presumed intention of integration is to encourage apprentices to complete their apprenticeships and bring achievement rates in line with the ministerial target, it may be more sensible to apply integration only where it is needed to meet this policy objective, rather than as a blanket rule with exceptions. A more targeted use would help to reduce the risk of unintended consequences.

Q11: To what extent do you agree that all integrated assessments should assess the same subset of KSBs?

No response.

Q12: To what extent do you agree that the defined subset of KSBs cannot be assessed by multiple smaller qualifications?

No response.

Q13: To what extent do you agree that only one subset of the KSBs should be identified for assessment by integrated qualifications?

No response.

Q14: 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.

No response.

Q15: 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?

No response.

Q16: 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?

No response.

Q17: 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?

No response.

Q18: 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?

No response.

Q19: 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?

No response.

Q20: 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.

No response.

Q21: 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?

No response.

Q22: 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 and/or evidence where possible.

No response.

Q23: 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 and/or evidence where possible.

No response.

Q24: 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 and/or evidence where possible?

No response.