

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

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

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

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

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

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

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

## Confidentiality & Data Protection

Please read this question carefully before you start responding to this consultation. The information you provide in response to this consultation, including personal information, may be subject to publication or release to other parties. If you do not want your response published or released then make sure you tick the appropriate box?

Yes, I would like you to publish or release my response

No, I don't want you to publish or release my response

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

- Business representative organisation
- Independent Training Provider
- College
- Awarding Organisation
- School
- Charity or social enterprise
- Individual
- Legal representative
- Local government
- Large business (over 250 staff)
- Medium business (50 to 250 staff)
- Small business (10 to 49 staff)
- Micro business (up to 9 staff)
- Professional body
- Trade union or staff association
- Other (please describe)

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

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

Pearson fully supports the view that an Apprenticeship must be about developing new skills and knowledge and that this new learning will require a period of time to acquire and develop. This is regardless of age.

Consideration should be given to:

- The terms 'substantial' and 'new' need to be clearly defined in order to avoid misinterpretation and potential confusion among the wide range of Apprenticeship stakeholders
- The linking of funding and or incentives to employers to recruit new Apprentices or identify existing staff who require "substantial" development of new skills will prevent Employers using the current Apprentice budget for existing experience employees.
- The recognition that Apprenticeships are also about the development of knowledge as well as skills/training and that sufficient time is given to enable the development of the knowledge element.
- The introduction of an auditable IAG process which acknowledges the 'starting point' and 'distance travelled' by the apprentice throughout the Apprenticeship would prove valuable. This would support the employer in providing the appropriate opportunities to the learner within their programme, and also to fully understand the benefits of Apprentices to their organisation. This is a key reporting process required by Ofsted.
- Research has identified that more 'classroom based' delivery has had better success, due to the education environment for the delivery of the knowledge and skills. Therefore this would suggest the need for more robust structure around the workplace learning component of the programme.

**2. The Richard Review recommends that every Apprenticeship should be based on employer-designed industry standards. It recommends that these new standards should focus on outcomes and mastery of the occupation or major job role, and should replace Apprenticeship frameworks, the current qualifications which comprise them and the national occupational standards which underpin them. The**

**new standards would set out simply and clearly what employee in that occupation or major job role will need to be able to do.**

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

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

We agree that employers need to be at the heart of defining standards within Apprenticeships. This is what, at least in theory, has been the situation for a number of years where skills bodies (e.g. SSCs) work with employers to create standards which are relevant, robust and up-to-date, meeting the needs of the current sector skills agenda and paving the way for future skills requirements. However, it is difficult to see how, without significant investment, a further incarnation of these organisations would be any more successful in expressing the views of the sector than its predecessors.

- This should be a national priority which is led by BIS, NAS and also the LEPs who have the opportunity to play a huge part in brokering across the many stakeholders.
- Too frequently the outcomes of these sector bodies have been limited, understandably, to a collective large employer view which often has a different story to tell than that of the smaller independent company. It is important therefore to ensure that the voice of the SMEs via the LEPs, as outlined in the Holt review, is included along with sufficient incentives for them to engage with apprenticeships.
- Articulate clear value and benefits for employers to engage. We support both the Richard and Holt Reviews recommendation for an incentive through the tax or NI system to encourage and enabled the involvement of a wide range of employers, including the smaller ones – which collectively employ the largest proportion of employees.
- Employers, particularly in the SME market, often take a short term view on the development of skills for their sector – theirs is a more immediate need. The guidance and support of Sector and Awarding Organisations can facilitate the development of standards which take into account the immediate needs and also those of the sector 5 and 10 years from now.
- Pearson already works extensively with a range of employers to inform and support our programme developments. Government should capitalise on the trusted relationships that have already been established between Awarding Organisations and employers and should use these to support any future change.
- Consideration should be given to the establishment of a Training Standards Body, which would be responsible to Government and linked to the LEPs and the

NAS. This body would consist of sector/industry groups which would determine current and future sector needs. The purpose would be to give a platform for employers to agree the context and content of Apprenticeships at both a national and local level.

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

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

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

Pearson is supportive of the proposed criteria. However, we would expect the criteria to acknowledge more explicitly that an apprenticeship is about education as well as training.

- In order to ensure transferability, sector growth and technology developments, it is essential that frameworks are reviewed and updated regularly.
- It is essential that an agreed level of flexibility is included to cater for the mixed range of large employers and SMEs who may wish to offer the frameworks. This is also important to ensure local needs are met.
- Evidence suggests that there is a culture within our education system of 'one size fits all', however we would call for a quality assured flexible framework which meets the needs of diverse employers and workforces without compromising on standards or quality.

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

**The government recognises the strong arguments set out in the Review that there should be only one standard. We also recognise that for some sectors the nature of individual jobs may vary significantly between employers, even for job roles that are**

**nominally the same. We need to find a solution to take account of this – for example through a “core and options” approach for each standard and qualification, increasing their flexibility to different settings and contexts whilst ensuring a rigorous core of essential knowledge and skills.**

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

Yes  No  Don't know

**Please explain your response:**

The document refers to industry, qualification, occupational and performance standards all of which are valid but are not interchangeable. It would be useful to define which one standard is required as each will require different methods of management.

A broad industry standard designed by employers would enable apprentices to understand the industry they are working in. These would then be developed by sector and Awarding experts into Occupational, Qualification and Performance standards – which reflect the needs and requirements of specific job roles so that Apprentices know what is expected of them.

The streamlining of curriculum which occurred for KS4 and KS5 resulting in a streamlining of the qualification offer will not work for Apprenticeships as the job roles and occupations within sectors are very wide and as such the frameworks need to be able to accommodate this.

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

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

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

Yes  No  Don't know

**Please explain your response:**

In response to this question Pearson believes that if there are nationally agreed standards and national requirements for the development and delivery of qualifications then the number of qualifications available is irrelevant and will come down to choice and service provided by the Awarding Organisation.

However, building on the points made in Question 5, for employers to become engaged they will need to see that the Apprenticeship frameworks develop the skills, knowledge and understanding they need for their staff and individual businesses. It is highly unlikely this would be achieved with one qualification per standard.

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

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

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

**Question 6: How should we manage the transition from the current system of Apprenticeship frameworks to a new system of employer-designed Apprenticeship standards and qualifications?**

The proposal represents a major change in the current system and will need to be planned carefully to minimise disruption. It is also important that any changes recognise the value of the existing respected and successful Apprenticeship programmes which are already used by employers and learners.

The proposed 'new system' will affect all stakeholders within the Apprenticeship arena and as such it is essential that a wide ranging and comprehensive impact assessment is undertaken before any significant changes are introduced. Appropriate time should be given to the relevant groups of stakeholders to define, develop and propose an implementation timeline. This may well affect the take up of current Apprenticeships by both learners and employers if it were to be perceived that the current system had lost credibility and value. Communication and messaging will be important to ensure confidence in the value of the current system while focussing on the desire to improve quality and standards still further and to position Apprenticeships as a credible and appropriate pathway to employment.

Pearson recommends that consideration should be given to the implementation of a pilot phase for each sector. This would allow for a gradual introduction and roll out, and ensure that effective audit and review measures are embedded.

The introduction of a new Apprenticeship offer must be seen in conjunction with other policy developments, in particular the Whitehead Review (Traineeships, Study Programme and other 14-19 education reforms) all of which will require commitment and full engagement from the education and skills community. To support the learner journey, opportunities and progression, a holistic view of the education and training landscape is essential.

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

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

Any qualification standard must be regularly reviewed and updated in order to be responsive to current and projected future needs. This is paramount to the success of a developing a robust Apprenticeship culture. However, this is not an easy or quick activity to undertake in a regulated environment. There will also be issues around redevelopment costs, currency etc, which would need to be carefully managed.

This reflects previous questions around the initial development of standards. They must not be over complicated and should allow for a managed degree of flexibility to allow for evolutionary change. This should enable a longer 'shelf life' and less disruption. Having a generic core – the industry standard - and pathways would help facilitate this.

One essential requirement is to identify who would be responsible for the changes and updates, how this would be financed and how employers of all sizes would engage with this body. There is a role for the LEPs in this process to ensure that the needs of local and regional employers are taken into account.

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

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

There is a clear role for employers in the design and development of an end of Apprenticeship final assessment.

Our recommendation for the "end point assessment" would be in the form of a project which should not be an academic exercise, but rather a bringing together of the knowledge, skills and training that the apprentice has developed over the period of the apprenticeship.

Employers would work with their provider to design the project within the context of the apprentice's area of work and should be designed to be of future benefit to the employer and the apprentice. The employer should also be involved in the assessment of the project outcomes to agreed assessment criteria.



This would not be the only form of assessment within the Apprenticeship and this is further developed in the response to question 10.

However, this would only form part of the assessment of the whole Apprenticeship, the remaining assessment during the duration of the Apprenticeship would be carried out by professional education and training professionals and would be quality assured by the Awarding Organisations.

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

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

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

Our response to question 8 outlines how employers should be involved in the design and assessment of the end of Apprenticeship project. Employers would need to be supported in the design of the assessment criteria for the project and also offered training in the standardisation of assessment decisions.

Quality Assurance needs to be built into the design of the standards so that there is consistency of approach and employers have confidence in the process and the resulting outcomes. This would be monitored through internal and external inspection and scrutiny mechanisms.

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

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

The final end of apprenticeship project should not be the only assessment point during the Apprenticeship. Apprenticeships can vary in length and for some of the Engineering frameworks this could be 3-5 years. It is therefore important to incorporate assessment during the programme to check understanding, application of knowledge and skills acquired.

All assessments should be carried out by trained assessment professionals who have an in depth understanding of the standards they are working to and the level of competence required to make decisions on an individual's competence. These decisions require external monitoring and national standardisation and this is a role for the independent Awarding Organisations which are best placed and experienced in carrying out this function.

The above demonstrates a more holistic approach to the apprenticeship experience which Pearson has encouraged through our BTEC Apprenticeship programme.

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

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

There is no evidence to suggest that staged assessment has led to non-competent people being deemed competent. The introduction of an end point assessment as described in 8 and 10 above would add value and validity to the overall apprenticeship programme but it should be seen as the unifying part not the whole.

There is a serious concern that an end assessment or test would be seen as a barrier/hurdle to some apprentices who have benefited from staged assessment.

The nature of an Apprenticeship scheme and the length of time taken indicates that an end point for assessment would act as a deterrent, be costly to implement and disruptive to the employer.

We recommend the End of Apprenticeship project as outlined above as the final but not the only stage in the assessment process.

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

We do not support grading within an apprenticeship because by definition this is about competence. Assessments of knowledge could theoretically be graded but this would inevitably lead to increased costs and a prescribed assessment regime across all awarding organisations. Pearson supports the principle of differentiation and feels this could best be achieved by added value qualifications which enable individual apprentices to show excellence.

Pearson has already introduced at L2/L3 a qualification in Performance Excellence which acknowledges the achievement of learners who go 'the extra mile'. It is a generic set of criteria which can sit within any framework, and has been recognised by the World Class Skills competition.

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

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

**Question 13: What are the specific obstacles to all Apprentices achieving level 2 English and maths as part of their Apprenticeship, and how could these be overcome?**

Pearson's view is that the successful completion of an Apprenticeship at Level 2 should be dependent on level 2 attainments in English and Maths. However, we also recognise that to achieve this will require additional support for Employers and Providers and we recommend that a target year is set for this to be introduced. This target year should be agreed following a more detailed impact analysis has been completed and actions put in place to make this achievable.

We would recommend the development of contextualised or applied maths and English assessments at L2 designed for the workplace, building on the Functional Skills approach. Functional Skills was not originally designed with apprenticeships in mind, so it would benefit from further review and refinement to ensure that it meets the needs of employers and supports apprentices to succeed.

**Question 14: How would a requirement to have all Apprentices achieve level 2 in English and maths impact on employers, providers and potential learners? What are the risks and potential solutions?**

Currently the requirement is for Apprentices to work towards the achievement of level 2 Functional Skills. As we recommend in Question 13, as we move towards making this a requirement work should be done to ensure the content fully met the needs of the frameworks and employers. We welcome the opportunity to work with Government and providers to continue to develop Functional Skills for the work based learning market, particularly at level 2.

In particular, employers, providers and Apprentices report that the level 2 standard is very broad and contains elements which are not required within all frameworks/job roles to enable functionality and competence.

Some providers report that employers are reluctant to release apprentices for Functional Skills development as the material being covered is not relevant to their job role and so time is taken from the development of the Technical Certificate Underpinning Knowledge delivery to cover the required Functional skills material.

The challenge therefore is to ensure we do not create inappropriate barriers to achieving an apprenticeship in a particular discipline or undermine delivery of technical elements, whilst also ensuring that all learners have access to the skills needed for progression and mobility later on.

A potential solution would be to review the Functional Skills at level 2 and identify core learning that all apprentices need from Nursery Nurses to Engineers. The sector frameworks could then contain additional Maths and English content which apprentices need to function within the sector at both level 2 and 3. This would then be delivered and assessed within the context of the standard.

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

**Question 15: What further steps, by government or others, could encourage greater diversity and innovation in training delivery to help Apprentices reach the standards that employers have set?**

There is a need for programmes to have maximum flexibility to allow for differentiation of learning needs and programme delivery variations.

Development of specific CPD packages to support deliverers develop the skills to deliver and assess in a holistic way, bringing together the Apprenticeship as a complete programme rather than separate qualifications. Currently much of the teacher training offered is very generic and not specifically aimed at those wishing to deliver in the WBL arena. This is a key opportunity for development of professional training programmes which would support the overall take up of apprenticeships by employers.

School engagement must be improved, as learners have the right to be well informed of all options available to them. A key priority for all stakeholders is in the positioning of Apprenticeships as a valid and valued pathway on parity with the more traditional academic route. The duty to deliver impartial IAG to learners in schools as part of RPA is a key driver to this agenda.

We recommend that the Government also looks at the innovative work being carried out in the UK and overseas using different methods of training and assessment using software that young people are using in everyday life i.e. Gaming software.

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

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

Providers need to work flexibly with employers to ensure that the time away from the workplace is kept to a minimum to avoid disruption and loss of productivity. This may involve the offer of visiting the employers premises to deliver training and development to the apprentices or provision of e-learning materials, webchat etc.

Employers must appreciate that some learning and development needs to be delivered away from their workplace/desk for it to be effective. This does not have to be off site just away from the demands and potential interruptions of their usual place of work.

Attending college or a provider’s establishment is not always required although the occasions may arise when access to specialist equipment is necessary or a suitable place is not available at the workplace for testing/assessment to occur.

Individuals learning styles also need to be taken into account when considering the best approach to take for learning and training.

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

Yes  No  Don’t know

**Please explain your response:**

This should not be a requirement as long as learning can take place on-site in a place where the apprentice will not be disturbed and the learning will not disrupt normal working for other staff.

The key requirement is that time for learning is required and to ensure that occurs but there needs to be flexibility as to how time for learning is arranged and where this takes place.

**18. Employers need to be able to trust in basic safeguards for the legitimacy, quality and capacity of training providers they may wish to deal with. The Skills Funding Agency checks the financial credentials, capacity and any Ofsted inspection record of training providers receiving public funding. We will build on these arrangements**

**to ensure that, as far as possible, they are an effective assurance of training quality as well as financial health, and that this information is accessible to employers to support their choice of provider. In doing so, we must ensure a process that facilitates new providers entering the market. We are also developing a “chartered status” concept, to give employers a visible symbol for high quality and responsive training organisations.**

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

At Pearson we already put providers through a rigorous approvals process and carry out monitoring and audit visits to ensure standards and quality are maintained.

We would suggest the introduction of a “Trip Advisor” service for employers and apprentices be explored. This would enable users to rate the service they have received from providers and would ensure the service and quality of the training remained high.

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

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

Yes  No  Don't know

**Please explain your response:**

We do not consider a kitemarking scheme would add value or be supported.

There is already a rigorous approvals process in place for providers to offer apprenticeships and other vocational qualifications. This process along with annual monitoring of performance by the Awarding Organisation and inspection by Ofsted is a better guarantee of quality than the suggested Kite Marking Scheme.

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

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

**Question 20: What more can government do to facilitate effective third party/external use of its data to better inform individuals and employers about Apprenticeships?**

Pearson has no explicit views on this aspect, other than the use of ONS apprenticeship data being used to inform the relevant sectors.

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

Parents and guardians in assisting young people in choices need to be confident that any advice given is independent as well as being accurate, impartial and in the best interests of the young person.

Schools now have a statutory duty to provide Careers advice to the young people in their care. It is therefore important that they have access to a range of careers advice services to provide this independent level of advice.

Apprentices, who have been involved and benefited from the Apprenticeship process and Employers which have supported apprentices are the best advocates for the Apprenticeship and they should be encouraged and supported by NAS, LEPs and regional networks to speak at school events and via Apprenticeship networks, websites etc.

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

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

Support could be provided locally via the LEPs to support events and networks which bring employers into contact with potential apprentices of the future.

The Study Programme and Traineeship both have requirements for a significant period of work-experience. It is therefore in schools and providers best interests to engage with local and national employers to ensure that learners get a high quality experience. Both

the NAS and LEPs can provide a platform for this bringing the employers and school, providers and learners together.

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

**Question 23: Do you consider that the proposals set out in this document would have a positive or negative impact on any group, including those with protected characteristics? Please provide any comments or evidence you have for your answer and set out which aspects of the reforms will impact and how these impacts might be managed.**

Apprenticeships have been a success in England and as such major change is not required, more a process of continuous improvement.

Much of the success has been down to the continuous assessment process where there is adequate checking that individuals have acquired knowledge and been able to apply this before moving onto broaden and deepen their learning. This is quality assured during the programme by the Awarding Organisation to reinforce that Apprentices are achieving the required standard.

We consider the suggested introduction of end assessment, rather than a project approach, would be expensive and logistically challenging for employers, particularly SMEs and Micro employers, while not improving the overall experience. We do however, support the introduction of a project, which as stated in questions 8-11 would involve and engage employers, of all sizes, in a positive way, enhancing the Apprenticeship experience and ensuring the maintenance of standards and quality.

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

No

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

**Please acknowledge this reply**