



# Quality Assuring Higher Education in Apprenticeships

Current Approaches

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# 1 About this document

This document describes how expectations relating to the quality assurance of higher education, as set out in the UK Quality Code for Higher Education, accommodate and apply to existing and emerging UK models of apprenticeships involving higher education qualifications at undergraduate and postgraduate level. Such models include Higher and Degree Apprenticeships in England, Higher Level Apprenticeships in Northern Ireland, and apprenticeships involving higher education qualifications in Wales and Scotland.

This document does not seek to interpret or explain other regulatory and funding requirements that relate to apprenticeships involving higher education; however, some information about these is provided for context, and as it relates to the Expectations of the Code. For definitive information about additional regulatory and funding requirements, readers should refer to the relevant bodies responsible for setting those requirements.

## 1.1 The purpose of this document

The purposes of this document are:

- to highlight key considerations for higher education providers in relation to the standards and quality of apprenticeships that involve their higher education qualifications
- to extrapolate guidance from the UK Quality Code that is particularly pertinent to the delivery of apprenticeships that involve higher education qualifications
- to highlight characteristics of the various UK apprenticeship models that may require special consideration in relation to higher education quality assurance approaches.

The document aims to set out for the higher education sector, employers, apprentices and other stakeholders the ways in which apprenticeship models are accommodated by current quality assurance approaches, as well as to identify areas where apprenticeship models may require existing principles to be interpreted and applied in new ways. It is intended to reflect and support the work of higher education providers who are already delivering components of apprenticeships, and to provide information to others who are considering delivering apprenticeships in the future.

This document is provided for information only. It does not constitute formal QAA guidance, and nor is it part of the Quality Code. QAA has agreed with representatives from the sector and other key stakeholders that, in the longer term, it will be appropriate to develop a Characteristics Statement, which will set out a comprehensive UK-wide picture of apprenticeships involving a higher education qualification. The statement will explore the key features of the various models in operation, especially as these relate to academic standards.

However, as the nature and position of apprenticeships across the UK is still evolving we have agreed that the development of such a statement should commence only once practice across the UK is more fully established and embedded. We currently anticipate that this will be in 2017-18. The development process for the statement will involve extensive and detailed consultation with stakeholders from across UK higher education, as well as employers, apprentices, and policy makers.

## 1.2 Who is this document for?

You may want to read this document if you are:

- designing, delivering and/or assessing apprenticeships involving a higher education qualification, or considering doing so
- an employer, seeking to find out more about how apprenticeships involving higher education qualifications are quality assured
- a prospective apprentice thinking about undertaking an apprenticeship involving a higher education qualification.

## 1.3 How often will this document be updated?

Our intention is to update this document regularly to reflect developments in the apprenticeship landscape across the UK. We will, for example, be working with the Office of the Independent Adjudicator (OIA) in the coming months to develop information on managing complaints and appeals relating to apprenticeships in England and Wales, and this information will be included in the next iteration of the document.

If you are aware of changes or developments that you would like the document to reflect, please contact: [enquiries@qaa.ac.uk](mailto:enquiries@qaa.ac.uk).

## 1.4 Terminology

Higher education apprenticeships operate under devolved systems and use different terminology in the four nations. To capture all of these levels and terms, this document will refer to the totality of these as 'higher education apprenticeships' or 'apprenticeships involving a higher education qualification'.

An apprenticeship is a job and any individual undertaking an apprenticeship that involves a higher education qualification will be employed as an apprentice. However, as a participant in a higher education programme they will also be considered to be a student by the higher education provider. The Quality Code was written with students in mind, and any references to students in this document in the context of the Quality Code should be read to refer to apprentices.

## 1.5 The structure of this document

We have structured this document to reflect both the commonality across, and the differences between, quality assurance approaches across each of the four nations of the UK. Each section opens with a description of the UK-wide picture, followed by colour-coded boxes containing descriptions of features unique to England, Scotland, Wales and Northern Ireland, where these are available.

Not all sections contain subsections for each nation and this is a reflection of the fact that apprenticeships agendas across the four nations are at different stages of development. As these agendas progress, we will update the document to ensure that it adequately reflects the UK-wide picture.

## 2 Context

### 2.1 About apprenticeships involving UK higher education qualifications

Work-integrated higher education learning programmes have been a longstanding feature of UK higher education. Examples include medical degrees with clinical attachments, teaching, nursing, and social work degrees, which all require varying periods of practice, work-based learning degrees specifically designed to recognise learning from work, and higher education workforce development programmes designed to meet the needs of employers. New models of apprenticeships that involve higher education qualifications represent the latest iteration of work-integrated higher education provision.

Apprenticeship models across the four nations of the UK are at different stages of policy development and implementation and these are described in more detail below.

All apprenticeships that involve a higher education qualification (a qualification that sits at level 4 or above on *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* and at level 7 and above in Scotland) are covered by the expectations of the Quality Code. Providers also need to comply with wider regulatory frameworks that relate to apprenticeships, as well as those covering funding and professional qualifications.

#### **The context in England**

In England, the Government has committed to deliver three million Apprenticeship by 2020. Higher and Degree Apprenticeships are central to this.

A key characteristic of Higher and Degree Apprenticeships in England, as in the other UK nations, is that an Apprenticeship is a job and the employer, not the individual apprentice, is the customer and purchaser of the Apprenticeship. Employers, starting with levy-paying employers, are purchasing Apprenticeship training provision and the services of an apprentice assessment organisation to deliver the End Point Assessment (EPA) (through the Digital Apprenticeship Service).

Individuals can only be employed as apprentices if they are working towards the achievement of an approved Apprenticeship Standard, which defines the knowledge, skills and behaviours required to perform an identified job role. Every Apprenticeship Standard is devised by a Department for Education consortium of employers that meet the requirements of the Institute for Apprenticeships (IfA) - Trailblazers - who employ people and operate in the relevant industry sector. Trailblazers also devise the way in which the required knowledge, skills and behaviours are assessed - this is outlined in the Assessment Plan.

Only one Apprenticeship Standard can be developed for an occupation. In 2016, 40 per cent of Apprenticeship Standards were at higher education level.

Assessment of knowledge, skills and behaviours is conducted through a holistic EPA. For Degree Apprenticeships, the Trailblazer has the option to specify that the EPA is integrated into degree programmes and provided by the higher education provider. Otherwise, EPA must be conducted by a separate apprentice assessment organisation. The outcome of EPA, whether integrated or non-integrated, determines whether the apprentice is competent to undertake the identified occupation.

## **Key players**

The recently published Department for Education Accountability Statement makes clear the roles and responsibility of key players within the approval, delivery and regulation of higher education in apprenticeships.<sup>1</sup>

## **The regulatory context**

To deliver Higher and Degree Apprenticeships, higher education providers must:

- be registered by the Education and Skills Funding Agency (ESFA) on the Register of Apprenticeship Training Providers (RoATP)
- where providing EPA or delivering an Integrated Degree Apprenticeship be registered on the Register of Apprentice Assessment Organisations (RoAAO)
- where delivering to non-levy paying employers have secured funding from ESFA to do so, or be subcontracted (ESFA rules apply) by a training provider who has secured an ESFA funding to deliver provision to non-levy-paying employers
- comply with the ESFA Funding Rules for Training Providers, Apprenticeship Service requirements and guidance issued by the ESFA, and contracts between the ESFA and provider, and employer and provider, and employer, provider and EPA organisation (where appropriate).

All providers of higher education in England are subject to the baseline regulatory requirements for quality assessment, which include the expectations of the Quality Code.

In England, Apprenticeships have legal protection equal to that of degrees, and approaches to marketing, information provision, development and delivery have to be undertaken in this context.

Specific rules and registration requirements apply to employers, including higher education providers who solely want to deliver Apprenticeships to their own staff.

## **Additional funding requirements**

The ESFA's funding rules govern the recovery of levy payments by levy-paying employers and Government payment top-ups, and will in due course cover transfer of unspent levy payments to non-levy paying employers, among other things. Higher education providers need to be fully aware of the funding rules if they are drawing funds to train and, where appropriate, assess apprentices. Higher education providers delivering Higher and Degree Apprenticeship are subject to ESFA audit.

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<sup>1</sup> See: [www.gov.uk/government/publications/apprenticeship-accountability-statement](http://www.gov.uk/government/publications/apprenticeship-accountability-statement).

## The context in Scotland

In Scotland there has been a commitment to fund 30,000 Apprenticeship starts by 2020,<sup>2</sup> with a specific commitment to increase funding for Graduate Level Apprenticeships.

A significant proportion of extra funding from the UK-wide levy will also be allocated to the devolved nations as a result of the Barnett formula,<sup>3</sup> with each nation developing and consulting on their own specific ways to use the funding to enhance employability and skills.

In Scotland, apprenticeships involving a higher education qualification at degree level are known as Graduate Level Apprenticeships, with their development being led by Skills Development Scotland (SDS).

Apprentices can progress to the highest level of professional qualifications with a range of entry and exit points, from a Higher National Diploma (SCQF level 8) to a master's degree (SCQF level 11).

Discussions with SDS, Universities Scotland and the Scottish Qualifications Authority have taken place on the quality assurance of Graduate Level Apprenticeships. The indications to date are that established quality assurance approaches will be extended to incorporate Graduate Level Apprenticeships.

## Key players

The **Quality Assurance Agency for Higher Education (QAA)** will quality assure SCQF level 8 to SCQF level 11 Higher Apprenticeships as part of the revised operating model for quality assessment in England.

**Skills Development Scotland (SDS)** leads on the development of, and supports the funding for, Graduate Level Apprenticeships (GLAs) in Scotland.

The **Scottish Qualifications Authority (SQA)** has a range of awarding body functions, including the development, validation and review of qualifications, the awarding of certificates, and quality assurance of educational establishments offering SQA qualifications. SQA Accreditation authorises all vocational qualifications (other than degrees) delivered in Scotland.

Universities Scotland is the representative body of Scotland's 19 Higher Education Institutions (HEIs).

## Additional funding requirements

Until autumn 2017, SDS has, through a procurement exercise, secured funded GLAs.

For those starting in 2017, Apprentices' learning costs will be funded by SDS for the full duration of the course.

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<sup>2</sup> See: [www.skillsdevelopmentscotland.co.uk/what-we-do/our-products/graduate-level-apprenticeships](http://www.skillsdevelopmentscotland.co.uk/what-we-do/our-products/graduate-level-apprenticeships).

<sup>3</sup> The Barnett formula is a mechanism used by the UK Treasury to adjust automatically the amounts of public expenditure allocated to Northern Ireland, Scotland and Wales to reflect changes in spending levels allocated to public services in England, England and Wales or Great Britain, as appropriate.

### **The context in Wales**

Over the next five years, the Welsh Government is committed to delivering 100,000 all-age Apprenticeships. Apprenticeship learning in Wales is defined through frameworks that specify the qualifications and training that must be achieved to earn an Apprenticeship certificate. Apprenticeships in Wales are delivered through the Welsh Government's Apprenticeship provider network.

Employers are at the heart of the Apprenticeship system in Wales. They are expected to directly influence the design of the learning they receive in order to ensure that Apprenticeships meet the skill needs in Wales.

The Welsh Government is committed to supporting the growth of Higher Apprenticeships. The focus of Higher Apprenticeships will be in areas of economic growth and skill shortages. The Welsh Government intends to develop alternative routes into and through higher level skills, with apprenticeships that contain degree-level qualifications. The Welsh Government is working with the Higher Education Funding Council for Wales (HEFCW) to develop a process for this.

### **The context in Northern Ireland**

In Northern Ireland, the 2014 Apprenticeship Strategy 'Securing our Success' committed to making apprenticeships available between level 3 and level 8 (PhD equivalent). This extension of the apprenticeship offer has been termed 'Higher Level Apprenticeships', a descriptor covering apprenticeships with a targeted qualification between level 4 (Cert HE/HNC equivalent) and Level 8 (PhD equivalent).

Under the reformed system of apprenticeships, employers have the key role in apprenticeship provision. An interim Strategic Advisory Forum, based on a partnership comprising employers, government, trade unions and training providers, has been established to advise government on the provision of apprenticeships.

A series of Sectoral Partnerships have also been established to advise government on the provision of apprenticeships. It is intended that Sectoral Partnerships will support the development of Higher Level Apprenticeship provision, with secretariat support from the Department for the Economy.

Higher Level Apprenticeships are currently in pilot stage in Northern Ireland, with a phased transition to a steady-state system of delivery planned over coming years. At present, there is no numerical target for apprenticeship starts in Northern Ireland, the focus being on developing a quality system of apprenticeships.

As the apprenticeships are still at a pilot stage, feedback is still being sought on policy on the quality assurance of the work-based element of the apprenticeships is in development.

### **Key players**

The **Department for the Economy (Northern Ireland)** has overall accountability for the system of apprenticeships, including policy and governance. At present, the Department also performs a quality assurance function for Higher Level Apprenticeships.

The **Further Education Colleges in Northern Ireland** are responsible for delivery of the off-the-job training component of apprenticeships at levels 4 and 5 in the province.

The **Higher Education Institutions** in Northern Ireland are responsible for delivery of the off-the-job training component of apprenticeships at levels 6 to 8 in the province.

### **The regulatory context**

In Northern Ireland, an apprenticeship is recognised through a series of core components, namely:

- An apprenticeship will be for a new employee, or in the case of an existing employee, a new job role that requires a substantial amount of learning and skills development.
- An apprenticeship will be available in professional and technical occupations commencing from level 3 up to level 8.
- The completion of an apprenticeship will take at least two years.
- Apprenticeships will enable mobility within a sector and across the wider economy by including a breadth of training beyond the specific needs of a job, through both on and off-the-job training.
- An apprenticeship will be designed to facilitate the progression of participants to higher professional or technical training or on to a higher academic pathway.

## 3 Quality assuring higher education in apprenticeships

### 3.1 Responsibilities of higher education providers

#### Setting academic standards and devising apprenticeships

All Higher Education providers that have the legal powers to award UK degrees are responsible for the academic standards and quality of the higher education qualifications that they award. This applies irrespective of the location/s in which programmes leading to those awards are delivered, who is involved in delivery, or whether they are delivered in conjunction with professional or other qualifications. Accordingly, degree-awarding bodies, such as universities, have sole responsibility for the academic standards and quality of any higher education qualifications that they offer as part of apprenticeships.

This means that when designing, developing and approving apprenticeships involving higher education qualifications, degree-awarding bodies must ensure that those higher education qualifications meet the expectations for academic standards and programme design set out by the Quality Code. They must, for example, position each qualification at the appropriate level of the relevant qualifications framework, and ensure that learning outcomes align with the relevant qualification descriptor in that framework; they must operate formal and effective processes for approval; and they must ensure that qualifications are only awarded where standards have been satisfied and the relevant learning outcomes achieved.

Although responsibility for academic standards can never be delegated, it is very common in higher education for degree-awarding bodies to work with other organisations, including colleges and employers, to design and deliver higher education programmes. Similarly, it is common for degree-awarding bodies to offer programmes that fulfil the requirements of a Professional, Statutory or Regulatory Body (PSRB), or programmes that are delivered in conjunction with professional qualifications. In these circumstances, as for all higher education programmes, the programme design, and in some cases approval, monitoring and review processes, will take into account input from a range of sources including staff, apprentices, employers and PSRBs. The Quality Code encourages use of external reference points and expertise and recommends that providers support both staff and other parties to contribute effectively to programme design, development and approval.

A defining feature of new apprenticeship models is that they are led and designed by employers to reflect employer need. Therefore, higher education providers need to be sufficiently flexible to ensure that they respond to diverse and emerging employer priorities when designing and developing learning programmes, while also ensuring that they are able to satisfy requirements for assuring academic standards. The independence of higher education providers and the autonomy that they have to decide what programmes to offer, within the wider framework governing academic standards and quality, means that they can ensure that standards and quality are not compromised.

In this context, the employer-led characteristics of apprenticeships that involve higher education qualifications mean that higher education providers will have to meet the overarching requirement for assuring academic standards and quality, and the need for a more work-integrated programme designed along with employers, as well as the legal requirements of national apprenticeship policies and associated PSRB accreditation standards. This may involve a cultural shift for some higher education providers, in that it positions employers as the main driver in the development process for apprenticeships that involve higher education qualifications. A traditional approach, where a higher education provider would invite an employer to endorse a programme after it has been designed, will not suffice.

## England

In the new English system, as outlined in the previous section, Apprenticeship Standards documents specify the knowledge, skills and behaviours (KSBs) required to demonstrate full occupational competence in the relevant job role. These Standards are developed by Trailblazer groups made up of employers in a particular industry sector.

The Trailblazer approach is designed primarily to put employers' needs at the heart of the apprenticeship development process. However, Trailblazer groups normally liaise with, and refer to, groups of potential providers in the process of devising Higher and Degree Apprenticeship Standards and associated Assessment Plans.<sup>4</sup> Where Trailblazer groups are seeking to develop integrated Degree Apprenticeships, higher education providers and PSRBs (where appropriate) will normally be full members of the consortia and collaborate in the design of the Standard, the Assessment Plan and higher education learning programmes that deliver the Standard.

It is a condition of ESFA funding that higher education providers must ensure that the programmes they offer are designed to enable an Apprentice to develop the KSBs specified in the relevant Apprenticeship Standard. When designing and developing apprenticeships that involve a higher education qualification, higher education providers must therefore ensure that their programmes constitute an appropriate preparation for the achievement of the KSBs as specified by the Apprenticeship Standard, and that they meet national requirements for the academic standards and quality of higher education qualifications.

The successful completion of a higher education qualification associated with a Higher or Degree Apprenticeship is not necessarily the same thing as the successful completion of the Apprenticeship itself. All Apprenticeships require the successful completion of EPA and it is the responsibility of the relevant Apprentices Assessment Organisation,<sup>5</sup> which conduct EPA, to claim Apprenticeship Completion Certificates from ESFA.

The higher education provider remains the awarding body for any higher education qualification required for the completion of a Higher or Degree Apprenticeship. Where higher education providers are delivering integrated Degree Apprenticeships, the EPA will be integrated within, and be coterminous with, the completion of the degree.

When looking at design, development and approval of apprenticeships there are a number of areas worth further consideration:

- Apprenticeships involving higher education qualifications are designed to provide appropriate opportunities for apprentices to achieve all the KSB outcomes included in the relevant Apprenticeship Standard and the requirements of the associated Assessment Plans. The clarity of the relationship between KSBs and programme and module learning outcomes is a key consideration for higher education providers of Higher and Degree Apprenticeships.
- As higher and degree Apprenticeship Standards are developed by consortia of employers (Trailblazers), early engagement with these groups can be a valuable means to contribute to the design and development stages to promote alignment with required higher education standards and quality expectations.

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<sup>4</sup> Trailblazers wishing to seek support from Universities/HEIs can contact the University Vocational Awards Council (UVAC): [uvac@bolton.ac.uk](mailto:uvac@bolton.ac.uk).

<sup>5</sup> Only organisations that are listed on the Register of Apprentice Assessment Organisations (RoAAO - held by SFA) are eligible to conduct EPA.

Trailblazer groups are also required to provide evidence of the support of at least two higher education providers when submitting a proposal for a Degree Apprenticeship.

- Once a Standard is approved this does not mean that an Apprenticeship programme must only deliver the 'outcomes' that the Standard defines. Customer employers, students and staff may all add to the design, and normal consultation and other processes during design, development and approval are still applicable.
- Through design, development and approval processes higher education providers attempt to provide students with equal opportunities. When those students are also apprentices, higher education providers will consider how equality of opportunity for learning is ensured in the context of the variety of employment settings (for example, the structure of programmes and the scheduling of assessment in relation to annual work patterns).
- When evaluating their design, development and approval processes higher education providers review where changes are required to accommodate the delivery of Apprenticeships, and where additional guidance would be useful (for example, concerning how higher education providers build in approved Apprenticeship Standards and Assessment Plans as reference points for the development of their Apprenticeships).

## Scotland

Graduate Level Apprenticeship (GLAs) are work-based learning programmes at Scottish Credit and Qualifications Framework (SCQF) levels 8, 10 or 11 that lead to degree-level qualifications. These are nationally recognised, accredited and certificated by a national awarding body or organisation and created in partnership with industry and the further and higher education sector.

GLAs support the acquisition of the necessary knowledge and skills needed for graduates to work and progress in industry. They are procured and part-funded by Skills Development Scotland (SDS).

SDS is developing GLAs with the assistance of Technical Expert Groups (TEGs). A TEG has been set up for each industry where SDS is developing a GLA. These groups are made up of employers, higher education providers, industry bodies and subject matter experts who are working and teaching within the industry. TEGs work collaboratively to agree learning outcomes that the subject matter expert will then use to create a framework. Once this framework is drafted it is circulated to the TEG members for feedback and agreement. This method of working enables the development of robust frameworks that will deliver GLAs which are industry relevant and industry recognised.

When designing, developing and delivering GLAs, higher education providers are expected to:

- work in partnership between employers and any other involved providers (such as colleges) in order to design a programme of study that meets: the GLA criteria developed by SDS; the aims of the GLA framework as developed by the TEG; the needs of employers; and the academic requirements of the awarding body
- have clear goals and aspirations in support of equality and diversity with appropriate monitoring and other processes in place

- ensure liaison with the employer on the content and practical activities in the apprentice's individual learning and training plan, including the technologies and/or software development environments used
- ensure robust evaluation and enhancement for the programmes offered
- demonstrate how the higher education programme will ensure that apprentices:
  - achieve necessary industry knowledge and skills
  - achieve relevant transferable professional knowledge and skills
  - can achieve professional body recognition
  - develop graduate attributes, including research capability
  - develop learning through reflection and review of work processes and experience.

### **Northern Ireland**

The system of apprenticeships in Northern Ireland is in a pilot stage, building on the review of apprenticeships and a formal strategy in 'Securing our Success' - both of which were launched in 2014. As the results from the pilot emerge, features unique to this country will be incorporated here.

### **Recruitment, selection and admission**

Higher education providers' obligations with respect to the recruitment, selection and admission of students, as set out in the Quality Code, are underpinned by the widely accepted 'Schwartz principles' of fair admission.

Those principles a fair admissions system should:

- be transparent, and provide consistent and efficient information
- select students who are able to complete the course as judged by their achievements and potential
- use assessment methods that are reliable and valid
- minimise barriers to applicants
- be professional in every respect and underpinned by institutional structures and processes.

They require a fair approach achieved through transparency, the use of reliable and valid assessment methods, minimising barriers for prospective students, professionalism, and practices, which enable the selection of students who are able to complete the chosen programme of study.

While providers would be expected to abide by these principles in all of their recruitment, selection and admission activities, the processes for recruitment and entry for apprenticeships are different from those used for student recruitment and admission. As employees, apprentices will be recruited by the employer. Dual admission procedures may therefore be needed in order to ensure that the employer's recruitment requirements are satisfied, as well as the higher education providers' minimum entry requirements. Alternatively, the employer may seek to work in partnership with a higher education provider to support selection and minimise the need for dual admission. In practice this may involve academic staff taking part in the assessment and interview processes for applicants.

## England

Selection of apprentices is, in England, principally an employer-led activity. It therefore mirrors the recruitment processes operated by employers, which may involve some initial screening and selection process. It is important to note that apprentices can be either new or existing employees and that the required evidence of merit and potential to complete successfully may differ.

Higher education providers need to be mindful of the entry requirements set within the relevant approved Apprenticeship Standard. As well as minimum entry qualifications and UCAS points, requirements can include other forms of evidence, such as prior experience of work quantified by years of experience and/or levels of responsibility.

Apprenticeship Standards will typically specify where opportunities for the recognition of prior learning (RPL) are available on entry and, again, higher education providers need to ensure that consideration is given to the requirements described in Apprenticeship Standard documents and their own policies and procedure for RPL.

The employer contracts primarily with the provider to deliver the apprenticeship, rather than the traditional approach where the provider contracts with the student. However, where an apprenticeship involves a higher education qualification, the higher education provider will also have a contractual relationship with the student. The provision of apprenticeships involves important contractual dimensions that both higher education providers and employers need to consider. The specific arrangement will be defined in the Written Agreement (contract) between the employer and the higher education provider, and in the three-way Commitment Statement between employer, provider and apprentice/student. In the case of non-integrated Degree Apprenticeships, the role of the apprentice assessment organisation and the interactions it will have with the provider and apprentice respectively should also be considered

In order to support the recruitment, selection and admission process, the higher education provider publishes information about its apprenticeship offer; how the provision is managed, organised and quality assured; and how apprenticeships fit within the provider's overall mission, values and strategy and the policies that underpin its work. For prospective apprentices and their employers, information may also include:

- the type and level of apprenticeships offered
- the different locations and modes of learning that are supported and how these are organised by both the provider and the employer
- the central role of employers in recruitment and selection and how this fits with the admission requirements of the higher education provider (where appropriate, this would include details about RPL).

## Scotland

Recruitment, selection and admission processes for apprentices in Scotland are contextualised to the higher education provider, the employer requirements and the higher education programme entry requirements. As employees, GLA candidates will have undergone a selection process based on their employer's HR processes.

As part of the employer recruitment process, employers participating in the GLA are required to:

- select candidates who have a reasonable chance of achieving the selected degree, both in terms of the course content and also the acquisition of wider graduate attributes
- provide agreed information to support the candidate's application to the degree course.

The higher education provider's admission process would therefore take account of the employer requirements and liaise with employers to provide appropriate access to its programmes.

Higher education providers may also set minimum requirement for applicants in line with their other degree programme entry requirements. With agreement, entry requirements can be waived in the selection stage with demonstration of equivalence. Prior learning can be formally accredited through RPL.

In order to support the recruitment, selection and admission process, the higher education provider will publish information about its apprenticeship offer including:

- the title, level and mode of delivery for apprenticeships offered
- minimum and typical admissions requirements and any contextual factors
- how the provision is managed, organised and quality assured
- how flexible approaches can be used in assessing the suitability of candidates, by taking vocational qualifications, RPL and employer input into account.

## 3.2 Learning and teaching

### Learning, teaching and apprentice development

A key feature of apprenticeships is that the majority of learning takes place 'on-the-job' while apprentices are engaged in work activity. It is therefore fundamental that an apprentice's work will provide a source for learning, an environment for learning and the key context for learning. Meanwhile, 'off-the-job' learning can take the form of traditional face-to-face delivery by a higher education provider, or take place within the workplace, perhaps using workplace facilities, and may be supported by a variety of online learning opportunities.

The Quality Code recognises that UK higher education embraces a wide variety of modes of both learning and teaching, which can be used in different combinations and include flexible and distributed learning, work-based or placement learning, and technology-enhanced learning. It is also acknowledged that some or all of the learning opportunities may be provided by an employer or organisation offering a work-based learning opportunity, or an employer supporting its employee(s) on a higher education programme where the workplace is used as a learning environment.

As such, the Quality Code presents ample opportunity for providers to accommodate a wide range of sites and situations of learning, in order to deliver apprenticeships that align with employers' and learners' needs. However, it places specific requirements on those who design and deliver apprenticeships to ensure that the quality of the learning opportunities is consistent with that of all other higher education programmes. This includes, for example, the need to have clear agreement of responsibilities of all parties involved in learning, teaching and enabling student achievement.

The Quality Code highlights the need for all staff who teach and enable learning, including those staff who are not employees of the provider and/or are not based at the provider organisation, to be appropriately qualified, supported and developed. With regards to workplace mentors, higher education providers will normally have a variety of resources available to support and develop the range of staff involved in apprenticeship training, and ensure that they are appropriately experienced to undertake their responsibilities. These might typically include ongoing liaison with tutors with responsibility for supporting the learning development of apprentices (which can involve induction sessions and regular, scheduled virtual or face-to-face meetings).

The Quality Code also encourages the creation of an environment in which students take responsibility for their own learning; where they are fully informed about the opportunities available to them, but also aware of their responsibility to engage with these. It requires consideration to be given to the boundaries of responsibility between staff and the individual, and requires providers to make clear the roles and responsibilities of all people and organisations involved in supporting development and achievement. It places emphasis on the importance of reflective learning, and envisages students drawing on informal and formal feedback to engage in a dialogue with staff to help plan their future learning.

Apprentices will need to develop the ability to identify learning opportunities within the context of their day-to-day work activity in negotiation with employers and higher education tutors. These might, for example, take the form of negotiated work-based projects that build on work activities and integrate knowledge, skills and values developed through higher education learning. The development of reflective practice as a means of supporting the development of professional competence is a common feature of apprenticeships. This includes the use of approaches such as learning logs and professional development portfolios as vehicles for formative and summative assessment for learning, supported by feedback from workplace mentors and tutors.

## England

In England, the requirement is that at least 20 per cent of an apprenticeship must involve 'off-the-job' learning, while the remaining proportion takes place 'on the job'. The ESFA issues guidance on what constitutes 'off-the-job' training.

Every apprentice must hold a Commitment Statement which sets out the detail for the delivery of their apprenticeship and must also set out what is expected and offered by the employer, higher education provider (and any subcontractors) and the apprentice in achieving the apprenticeship.

A key consideration for higher education providers delivering Higher and Degree Apprenticeships that involve higher education qualifications is the integration of on-the-job learning and off-the-job learning.

The EPA for the apprenticeship (whether integrated with a degree or not) will test the extent to which full occupational/professional competence has been achieved through the apprenticeship. Higher education programmes that seek to prepare apprentices for EPA will be most effective where they seek to align or integrate on-the-job and off-the-job learning in doing this.

As Government policy is to give employers the flexibility when determining how best to support their apprentices in developing, the KSBs needed to be occupationally competent. Trailblazers are advised to avoid stipulating on-programme activity in assessment plans, with the exception of referring to any mandated qualifications.

Although employers are not required to use them, the role of the workplace mentor can be important in terms of the provision of learning opportunities. Mentors can help apprentices to identify relevant work activity that can operate as a source for work-integrated learning, they can advise on the development of work-based projects, they can provide feedback on the development of professional competence, and they can formatively comment on progress in achieving negotiated work-integrated learning objectives. In some apprenticeships, formally recorded quarterly or yearly reviews between the higher education provider and the employer are needed for EPA.

The expertise of those supporting work-integrated learning in higher and degree apprenticeships is significantly constituted through their professional qualifications, continuing professional development and professional practice. Some higher education providers offer formal programmes and qualifications in mentoring and coaching for workplace and other mentors as part of agreed arrangements with employers.

Arrangements between providers and employers should cover the roles and responsibilities of workplace mentors where used, and the employer's obligation to formally review apprentice performance with the support of the higher education provider, which includes attending EPA events where required to do so.

Apprentices have a responsibility to engage with the on and off-the-job learning and take responsibility for their own learning and development. Where higher and degree apprenticeships also lead to professional body (PSRB) recognition, the ability to identify, plan and take responsibility for continuing professional development may have to be integrated into the higher education learning.

## Scotland

Higher education providers will work closely with employers to develop the programme specification and content and the delivery and assessment of practical activities so as to meet the need of employers and employer bodies. They will adopt a flexible curriculum approach that utilises the apprentice's actual work environment and, where appropriate, the technologies and/or software development environments used in the apprentices' employment.

Apprentices must have individual learning and training plans. The higher education provider and employer HR systems should be co-ordinated during the development of the individual training and learning plan to ensure that the required employer contextualisation is effective. Consequently, delivery may include a variety of modes of attendance and delivery locations.

GLAs require higher education providers to ensure that work-based learning remains a consistent feature of the programme (GLAs at SCQF level 10 are 100 per cent work-based), and providers and employers will negotiate a minimum required attendance on campus that is proportionately smaller than the time spent learning at work. In most cases, contact time will be agreed on an ongoing basis with the employer as part of the flexible curriculum approach.

When designing and delivering apprenticeship programmes, higher education providers will have taken account of the needs of employers and employer bodies, including consideration of how:

- programmes align with employer strategic objectives and goals, and with standards e.g. national occupational and professional body standards
- partnership working is developed and sustained with employers
- apprentices are supported by employers and institution, using mentoring, for example
- programmes develop employability-related skills and graduate attributes
- programmes account for flexible delivery.

Accordingly, when delivering GLAs, higher education providers will:

- liaise with the employer on the content and practical activities in the apprentice's individual learning and training plan
- make effective use of existing employer HR and quality assurance systems as contributions to the assessment process
- ensure robust evaluation and enhancement for the programmes offered.

The higher education provider will use its approved year-by-year breakdown and indicative content for each GLA to co-plan detailed curriculum content, delivery and assessment with the employer, to maintain employer and industry currency needs and support apprentice development and employability. To support GLA delivery and teaching, employers are therefore expected to:

- provide apprentices with suitable opportunities for study
- provide each apprentice with a nominated mentor who must be readily accessible to the apprentice
- liaise with the higher education Provider on the content and practical activities in the apprentice's individual learning and training plan
- provide agreed information as part of the apprentice's assessment.

### 3.3 Assessing apprenticeships

#### Assessment

Higher education providers are required by the Quality Code to operate equitable, valid and reliable processes of assessment. The Code offers advice on practices that enable this requirement to be met. It highlights the importance of ensuring not only that academic standards are rigorously set and maintained, but also that student performance is equitably judged against these standards. Higher education providers that are delivering apprenticeships which involve higher education qualifications have the same responsibilities for the assessment of learning required for the achievement of these qualifications.

The Code indicates that effective assessment requires higher education providers to ensure that all those who are involved in assessment have undertaken appropriate training and are competent to undertake their various roles and responsibilities. This training will need to encompass effective ways to evaluate the extent to which learning outcomes have been achieved, and in the case of apprenticeships may involve staff at delivery organisations and employers, where they are involved in assessment processes. Where degree-awarding bodies work with others to deliver awards, delivery partners (that is, those without degree awarding powers) are expected to operate assessment processes within the academic framework and regulations of the degree-awarding body, in accordance with their delegated role.

The Code allows for RPL within higher education programmes, provided that an appropriate process of assessment enables a decision to be made about whether the learning is suitable for recognition.

Apprenticeships that involve higher education qualifications may involve the assessment of occupational or professional competence, particularly where apprenticeships provide a vehicle for PSRB recognition, as well as the assessment of academic standards. Such assessment may occur simultaneously, or may involve separate assessments. Degree-awarding bodies are primarily responsible for the assessment that pertains to the higher education award but may also be responsible for assessment that directly relates to other apprenticeship/professional standards. Higher education providers should consider how the various assessment requirements of the apprenticeship as a whole might be most effectively coordinated.

#### England

All apprenticeships in England require an independently assessed, synoptic EPA, arrangements for which are detailed in the relevant Apprenticeship Standard's Assessment Plan. This may be conducted by a separate independent Apprentice Assessment Organisation and selected by the employer. Where a Degree Apprenticeship is constituted with an 'integrated EPA' within the approved Assessment Plan, the higher education provider will conduct the EPA as an integrated aspect of the degree (for example, the assessment requirements for final 'capstone' modules may constitute the EPA). Higher education providers delivering integrated Degree Apprenticeships will need to ensure that they meet the requirements of the relevant apprenticeship Assessment Plan in demonstrating the independence of the process for EPA.

The EPA is designed to test that apprentices can demonstrate the KSBs specified in the relevant Apprenticeship Standard and that they are fully competent to perform the associated job role. It must be conducted at the final stage of the apprenticeship, after the apprentice has passed the gateway requirements set out in the relevant assessment plan,

and must include at least two assessment methods. Methods of assessment may include requirements such as a work or practice-based project and/or a performative assessment such as a presentation or professional conversation. Where an Apprenticeship Standard includes PSRB recognition, the EPA may stand as the requirement for establishing professional status and/or membership.

Apprentices should have achieved level 2 English and Maths prior to undertaking EPA; if they have not done so already, it is the responsibility of the higher education provider to facilitate this.

In the case of standalone, non-integrated EPAs, these need to take place in addition to any assessment of the achievement of learning outcomes that higher education providers undertake in order to secure the standards of the associated higher education qualification. A significant degree of alignment is therefore required, which may begin with the alignment of KSB outcomes and specified programme/module learning outcomes. Successful completion of a qualification in itself will not constitute the completion of an apprenticeship with non-integrated EPA.

One of the key factors required for the RoAAO is that EPA is carried out by assessors who have relevant practice-based experience and/or expertise. Academic 'subject' expertise may not be sufficient to demonstrate that assessors are equipped to assess the professional competence of apprentices to fully undertake the requirements of the associated job role. Where successful completion of a Higher or Degree Apprenticeship also confers PSRB recognition, the associated Assessment Plan may require that EPA is conducted by assessors who have a specified professional status, such as Chartered Member or Fellow.

The responsibility for the arrangements for EPA for Higher and Degree Apprenticeships (including contracting) lie with the higher education provider, but the selection of the organisation that will conduct EPA (from the RoAAO) is a matter of employer choice. It is the responsibility of the apprentice assessment organisation to ensure they have robust internal quality assurance arrangements to ensure that there will be no conflict of interest on the part of individual assessors and itself. This is because it is required to comply with the internal QA arrangements set out in the relevant assessment plan, and it must also stipulate how it will manage any potential conflicts of interest when submitting an application to get onto the ESFA's RoAAO.

In some cases, RPL may be precluded by the Apprenticeship Assessment Plan.

## **Scotland**

In Scotland, all GLAs are by definition integrated. Therefore, there are no EPA requirements. GLAs are principally designed to be delivered and assessed in the workplace, and take account of a range of assessment methods to accommodate workplace learning. An example of this could be:

- Delivery of generic and non-employer specific (e.g. knowledge and understanding) content by the higher education provider and specific content from the employer and/or private providers.
- Assessments where the task specification has been designed by the higher education provider, the employer and apprentice, with progress monitoring and assessment by the higher education provider and the employer. The employer would provide mentoring to the apprentice to support progress and attainment.

- Development of personal and business skills specifications that have been designed by the employer and the higher education provider, with delivery by the employer (and/or third party) and higher education provider. Progress monitoring and assessment would be by the employer (and where applicable the third party) and the higher education Provider. As with assessment, the employer would provide ongoing mentoring support.

This example demonstrates how the higher education provider and employer will work together in order to support apprentice assessment. Higher education providers and employers will ensure that assessment activity is aligned to both the provider's academic standards and the workplace activity in order to reflect the needs of employers and the apprentice.

Where RPL has been credited, the higher education provider ensures that recognition of prior learning does not conflict with its minimum terms of assessment to maintain standards for its awards.

## External examining

External examining is an integral and essential part of quality assurance in higher education. It provides one of the principal means by which academic standards are maintained across the sector. External examiners are appointed to provide degree-awarding bodies with impartial and independent advice, and informative comment on the degree-awarding body's standards and on student achievement in relation to them.

The Quality Code expects higher education providers to appoint external examiners for all programmes leading to a higher education qualification. Such examiners are drawn from higher education, industry, and/or the professions. They must be suitably qualified and experienced in a relevant subject or specialism, and external to, and independent of, the appointing higher education provider/awarding body. They typically work as part of larger examining teams across a range of programmes.

The Quality Code is responsive to the need to adapt external examining approaches as necessary in order to accommodate work-integrated higher education programmes, for example, which involve oversight or regulation by a PSRB.

When appointing external examiners for apprenticeships that involve higher education qualifications, higher education providers are therefore expected to ensure that all examiners are suitably qualified to undertake the role, which might mean, for example, having an appropriate level of practice-based expertise.

### England

External examining, a familiar feature of the higher education system, is distinct from External Quality Assurance (EQA), which is part of the Apprenticeships regime. In due course, the IfA will ensure that all assessment plans are updated to name an external quality assurance body which will provide EQA for the EPA of the relevant standard.

The requirements for EPA, as described in Apprenticeship Assessment Plans, include assurance that the process is appropriately independent. Assessment Plans will not always specify external examiner requirements, but are likely to do so for higher and degree apprenticeships that involve higher education qualifications. Assessment Plans for integrated degree apprenticeships will necessarily include reference to external examiners, as the EPA is conducted as an integrated aspect of the qualification and, as

such, must be under the auspices of the higher education independent external examiner system. However, where EPA is conducted by a separate independent Apprentice Assessment Organisation, higher education provider-appointed external examiners will not play a direct role in the EPA process.

Higher education providers ensure that external examiners are appropriately briefed as to the specific nature of their role for higher and degree apprenticeships that involve a higher education qualification. This will include: specifying whether the apprenticeship involves integrated or separate EPA; the relationship between Apprenticeship KSBs and programme/modules learning outcomes; the way in which EPA is conducted and any implications for their role; and how the learning opportunities provided by the higher education programme are delivered in the context of on-the-job and off-the-job learning.

Integrated Degree Apprenticeships involve EPA as an integrated aspect of the final assessment stage of the qualification. Higher education providers are required to make specific arrangements for EPA in accordance with the requirements of the relevant Apprenticeship Assessment Plan. Typically, this might include experienced industry practitioners who may also have established standing with relevant PSRBs. However, as the EPA process will be an integrated aspect of the higher education qualification, the independent external examiners appointed for the programme will have a role in overseeing the standards and process for assessment, including EPA.

### **Scotland**

A higher education provider's standard external examiner process applies for GLAs. External examiners provide external and objective feedback on the fairness and appropriateness of a higher education provider's student assessment processes and therefore form an integral part of the provider's review and evaluation procedures to assure the security of the academic standards of its programmes and awards. The activity culminates in an annual report from each examiner to inform internal quality assurance arrangements and enhancement.

### 3.4 The apprentice experience

A fundamental purpose of the Quality Code is to assure the quality of the student experience. It is premised on the need to put students at the heart of the higher education system by, for example, treating every student fairly and with dignity, courtesy and respect, and by giving every student the opportunity to contribute to the shaping of their learning experience. As apprentices undertaking apprenticeships that involve higher education qualifications will also be students, these needs apply to them. However, as employers are at the heart of apprenticeships it is important that higher education providers manage and reconcile the requirements and demands of both apprentices and employers.

The Quality Code's Expectation in relation to student engagement makes clear the importance of engaging students as partners in the quality assurance and enhancement of their learning. It asserts that student involvement in quality has a positive influence on the delivery and development of any aspect of the student educational experience. The Quality Code also highlights how learning and teaching specifically are most effective when there is a partnership between the higher education provider, their staff and students, and any external stakeholder (including employers) that results in the co-production and enhancement of creative and transformational learning.

The Quality Code acknowledges that students may have their own responsibilities to the delivery organisation and others (such as employees at other organisations where they study), including the responsibility to meet the norms and expectations for professional conduct in the particular field of work or study that they are undertaking, which might be covered in an employment contract.

Apprentices within higher education have rights and entitlements as students (fee paying or otherwise), and rights and obligations as employees. Those responsible for assuring the quality of the higher education qualification will navigate these different rights and obligations and ensure that they can be appropriately aligned.

#### England

Higher education providers offer a range of information for apprentices, signposting support services and enhancing the overall experience and communication activity between the provider, the employer, the apprentice and any subcontractor(s). Accurate and timely information help to inform the interrelationship between 'on-the-job' and 'off-the-job' learning to ensure that supervision, monitoring and feedback supports the apprentice appropriately. In particular, establishing clear expectations regarding the arrangements for workplace mentoring will be key.

Under the recent apprenticeship reforms, it is the employer, not the individual, who purchases training for the Apprenticeship. This means that providers of Higher and Degree Apprenticeships that involve a higher education qualification have dual responsibilities towards both employers and apprentices. It also means that the provision of Higher and Degree Apprenticeships has a potential bearing on the extent to which apprentices' rights and entitlements are comparable to those of fee-paying students. However, it does not override higher education providers' responsibilities for assuring the quality of the apprentices' experience as students of a higher education qualification. Rather, the needs of students must be balanced with the needs of employers.

The Commitment Statement signed by providers, employers and apprentices sets out what is expected and offered by the employer, higher education providers (and any subcontractors) and the apprentice in achieving the apprenticeship, and may be used to

provide some clarity on how the quality of the apprentice's experience can be assured, while employer needs are also met.

The need to seek and respond to student/apprentice feedback remains important in the context of the delivery of apprenticeships. As apprenticeships are offered through a range and combination of delivery modes, higher education providers will consider where, within their deliberative and non-deliberative structures, opportunities are sufficiently agile to capture the apprentice voice to allow opportunities to facilitate feedback about the apprentice experience and enhance learning opportunities. Existing opportunities may not be easily accessible for apprentices due to workplace commitments.

## **Scotland**

The design, delivery and assessment of apprenticeships is intended to reflect a collaborative arrangement between the higher education provider, employer and apprentice. While the employer does not formally contract with the higher education provider, its partnership working, best exemplified through the standard framework and work-based learning requirements, recognises the need to support the individual needs of the apprentice as well as the respective employer. This is articulated through the individual learning and training plans.

As registered higher education students, the apprentice would have access to the same facilities as the higher education provider's other students, appreciating that apprentices may interact differently with these services. Where the GLA is at SCQF level 10, and is 100 per cent delivered in the workplace, the higher education provider will work with the employer to determine how information about support services and its accessibility will be made available. Such consideration may be outlined through a Student Agreement.

Higher education providers work closely with the employer as part of the recruitment, selection and admission process to ensure that apprentices have sufficient opportunity to progress and achieve. The roles and responsibilities for employers and the higher education provider are clearly set out in relevant apprenticeship frameworks and work-based learning requirements that help to ensure the apprentice experience.

### 3.5 Managing provision with others

As noted in section 4.1, the design and delivery of apprenticeships requires the involvement of a range of organisations, including employers, higher education providers and, in some cases, other delivery organisations and/or PSRBs. Within this context, degree-awarding bodies retain ultimate responsibility for the quality and standards of provision leading to a higher education award. Meanwhile, degree-awarding bodies and other higher education providers may have contractual obligations to the employers with whom they work to deliver apprenticeships, as well as to the bodies that fund or otherwise support those apprenticeships and to the apprentices that undertake them.

The Quality Code is clear that the variety of arrangements for delivering learning opportunities with others that exist within higher education, including apprenticeship models, present a range of benefits and opportunities. These include, but are not limited to, flexible entry routes which may widen access, additional expertise and facilities, and curricula that are related to contemporary working practices and the needs of employers and employees. It also acknowledges the risks relating to quality and standards that can come with delivering learning opportunities with others, noting that arrangements that break down can present difficulties for students, and damage the reputation of participant organisations and UK higher education per se.

Accordingly, the Quality Code recommends a risk-based approach to managing arrangements, an approach that ensures that the effort invested is commensurate with the complexity of the proposed collaboration, the status of the delivery organisation or support provider, the level of experience of the degree-awarding body, and the risks associated with each of these. It is accepted that a one size fits all approach is not sufficient here and that degree-awarding bodies will develop and approve a range of different practices and procedures that are tailored and proportionate to the risks of the collaboration they are planning.

In particular, it points out that the due diligence enquiries and the formal agreements adopted for any one arrangement should be proportionate to the volume, complexity and nature of the activity, to the type of delivery organisation or support provider involved, and to the associated risks.

The Quality Code is clear that degree-awarding bodies can be flexible in the design and application of internal quality assurance processes in order to ensure that these are appropriate to the different timescales and contexts within which they may need to operate, and which can support the central role that employers play in apprenticeships. This can be achieved without undermining the broad principles that underpin the assurance of academic standards and quality.

#### **England**

Arrangements for the delivery and assessment of Higher and Degree Apprenticeships are underpinned by written agreements between the higher education provider and the employer. Written agreements establish clear expectations about the role(s) that employers will play in supporting apprentice learning. They can include aspects such as access to employer resources when engaging in off-the-job learning and arrangements for workplace mentoring, such as induction, training, employer-provider communication, involvement in EPA and protocols for addressing issues. In addition, arrangements for involving employers in higher education programme evaluation, monitoring and enhancement can also be formalised in written agreements.

Higher education providers may also establish agreements with subcontractors to deliver part or all of an apprenticeship. Where the scale of the delivery undertaken by subcontractors is over £100k, the sub-contracted organisation will need to be listed on the RoATP. Higher education provider arrangements for assuring the quality of provision delivered in its name apply equally to apprenticeships that involve higher education qualifications.

The relationship between higher education providers and Apprentice Assessment Organisations concerning arrangements for EPA also requires formal agreements to be in place.

Where a higher or degree apprenticeship that involves a higher education qualification also leads to PSRB recognition, this may also require formal agreements to be in place between the higher education provider and the PSRB.

### **Scotland**

The work-based learning component of higher education apprenticeships is a significant and central part of the whole award. The apprentice's work setting is therefore central to the contextualisation of learning and to the assessment of the award. Skills, knowledge and competence (SKC) are integrated throughout the programmes.

Graduate Level Apprenticeships (SCQF levels 8-11) are built on a partnership between employers, universities, colleges or other training providers and include the ongoing engagement of employers in the delivery, support and formative assessment of the programme. Employers are also involved in the range of quality assurance systems and processes.

## 4 Conclusions and next steps

There is scope within UK higher education providers' existing quality systems, which are underpinned by the Quality Code, to accommodate new and emerging apprenticeship models across the UK. Such apprenticeship models may require higher education providers to think creatively about the delivery of apprenticeships, to adjust existing processes, and to consider variations or exceptions to their current regulations, policies and practices.

As apprenticeships models grow and develop, providers should continue to ensure that quality and standards are maintained so as to protect their awards, the apprentices and the reputation of UK higher education and, in turn, to meet the skills needs of employers and the economy.

QAA welcomes ongoing discussion and information sharing around new and developing quality assurance approaches. We will seek to support such discussions in the coming months, and provide opportunities for the sharing and dissemination of new and innovative practice.

## 5 Annex: Membership of the working group for higher education apprenticeships

Adrian Anderson	UVAC
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