

## WRITTEN SUBMISSION FROM SKILLS DEVELOPMENT SCOTLAND TO THE PUBLIC AUDIT COMMITTEE, DATED 29 July 2014

Thank you for your letter of 30 June 2014 requesting further information from Skills Development Scotland (SDS) regarding:

1. The extent to which there is formal independent assessment of Modern Apprenticeship (MA) training provided by the non-FE sector (outside colleges), such as private Training Providers;
2. How SDS assesses the quality of on the job Modern Apprenticeship training by employers.

### **1. Independent assessment of the training provided by the non-FE sector (outside Colleges), such as private Training Providers**

#### Current Arrangements

The current assessment arrangements for training delivered as part of (publicly funded) apprenticeships are built on the principle of self assessment and continuous improvement. In designing this approach, SDS adhered to the recommendations of *The Independent review of Regulation, Audit, Inspection and Complaints Handling of Public Services in Scotland* (2007) chaired by Professor Lorne Crerar<sup>1</sup>. The review emphasised that the primary responsibility for demonstrating compliance and performance should rest with service providers, and asked the Scottish Government and Parliament to accept this principle to support the development of robust performance management and outcome-focused self-assessment amongst service providers.

SDS has a National Training Programme Quality Assurance Framework (QAF) in place, this can be accessed at the following link<sup>2</sup>:

[http://www.providercentral.org.uk/OurServices/QualityAssuranceFrameworkandStandards/QualityAssuranceFrameworkandStandards\\_v2.aspx](http://www.providercentral.org.uk/OurServices/QualityAssuranceFrameworkandStandards/QualityAssuranceFrameworkandStandards_v2.aspx)

The terms of our contract with Training Providers state that they must self-assess their own performance in relation to this framework. The SDS QA Team<sup>3</sup> scrutinise the evidence produced. Evidence is gathered from a variety of sources including, importantly, service users - as indicated within the framework document.

SDS also undertakes regular surveys of employers and apprentices which provides independent assessment evidence of the quality of delivery of MAs, including competence to do the job which is ultimately the goal of the apprenticeship programme of learning. Revised contract management arrangements implemented in this financial year have also placed greater emphasis on gaining feedback directly from employers and apprentices.

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<sup>1</sup> (Scottish Government, 2007) <http://www.scotland.gov.uk/Publications/2007/09/25120506/0>

<sup>2</sup> To access the QAF please see the further information section on Provider Central to access the *Quality Assurance Framework Indicators of Excellence August 2013* pdf document.

<sup>3</sup> The members of the SDS Quality Assessor Team are all European Foundation for Quality Management trained and accredited

However, other external bodies do have a key role to play. Awarding Bodies that own the qualifications (mainly Scottish Vocational Qualifications - SVQs) within MA frameworks also play an important role in independent verification of assessment of what is being delivered within the MA programme. They are obliged by SQA Accreditation to undertake this process on an annual basis. SDS takes account of these findings as part of the evidence considered in assessing contracted Training Providers against the Quality Assurance Framework.

Education Scotland (ES) undertakes independent assessment of the delivery of “off-the-job” training provided by colleges. This includes training that is both directly contracted and sub-contracted to colleges. The assessment is part of wider work undertaken by ES on behalf of the Scottish Funding Council, designed to meet the needs of their funded delivery, and as such it is not specifically targeted to MA provision. Given these existing arrangements, SDS has exempted Colleges from the self-assessment process to reduce the quality assurance burden.

There is no independent assessment of non-College training provision undertaken by Education Scotland at present. Historically, the rationale for this has been as follows: (1) the implicit value of apprenticeships is that they are industry owned and the award of the Certificate is wholly dependent on achieving competence to do the job; (2) related to this, is the perception that it would be inappropriate to apply an educational inspection process to what is a work and competence-based learning approach which is owned by the particular industries involved, and where the state is only part-funding the learning and/or assessment; (3) in light of persistent calls from stakeholders - particularly employers/industry and their representatives - to minimise the bureaucratic burden placed on those involved; and (4) the Crerar review recommended an approach which gave primary responsibility for assessment to Providers.

### Planned enhancements

SDS has been working with Education Scotland and Scottish Government colleagues to develop processes for independent, external quality assurance of all MA training provision. These developments are designed to enhance the current arrangements for any perceived gap in terms of review of MAs. This will also mean that there will be some required changes to the current arrangements for college external review which, as identified above, are not currently specific to the MA programme.

We have set out the proposals below for the Committee. However, we emphasise that these are in draft at present and are awaiting formal approval by the Scottish Government’s Post-16 Reform Board.

The key points of these proposals are:

- **Approach** - Education Scotland will use the relevant set of mandatory indicators from the National Quality Framework to assess the quality of off-the-job training delivery and will draw on feedback from apprentices and employers. These fit with Section 5 of the SDS NTP QA Framework relating to

delivery of training. SDS has mapped the NTP QA Framework against the National Quality System to establish synergies between the two Frameworks to identify strengths and areas for development.

- **Scope** - The review will commence with private Training Providers, Local Authorities and Colleges. The work of employers as Training Providers may be considered at a later date after discussion between Scottish Government and SDS. The rationale for excluding employers from the initial scope if the exercise was that formal external inspection may add to the bureaucratic burden already placed upon employers for learning which is only part-funded by the state, and where the employers are the main investor in the apprentice's training programme.
- **Proportionality** - Reviews will be proportionate to the size of the Training Provider and mindful of the complexities inherent in the delivery of the training element of MAs. The review will build on SDS QA intelligence, as well as a range of data sets and evidence already gathered through SDS and other monitoring activity, in order to gauge the quality of provision and establish where gaps exist.
- **Reports** - An external review report will be published for all industry sectors and the format will be agreed between Scottish Government, Education Scotland and SDS. Each provider will receive an individual report. External reviews will be publicly reported and reports will identify good practice and areas for improvement within delivery of the MA programme within that particular sector.
- **Review Programme** - The programme of reviews will be agreed between Education Scotland and SDS. A pilot, covering a part of the engineering framework, will be undertaken to trial the principles and methodologies. The initial arrangement is for a four year review cycle to cover all industry sectors/framework groupings. The review schedule will be agreed following approval of approach by the Post-16 Programme Reform Board.
- **Governance** - A steering group, including Education Scotland and SDS, will direct and inform the review procedures. A new, national reference group will be established to raise awareness of the arrangements amongst employers, apprentices and Training Providers. It is possible that the Modern Apprenticeship Group could assume this role.
- **Reviewer Skills** - Education Scotland recognise that review teams must include relevant expertise from both SDS and an industry specialist (to be nominated by SDS).

The design of the approach has specifically referenced and sought to address the historical concerns regarding bureaucracy and appropriateness outlined above. The plan is to pilot this approach with one industry sector during 2014/15 and the outcomes of this will inform implementation across all sectors commencing 2015/16.

## **2. How SDS assesses the quality of on-the-job Modern Apprenticeship training by employers**

### **Current Arrangements**

The NTP Quality Assurance Framework (QAF) is designed to demonstrate how the Provider supports the delivery of all elements of the apprenticeship programme, including delivery of learning within the workplace.

There are nine standards which Providers must meet within the overall Framework, and these include *Planning of Training Delivery* and the *Delivery of Training*. These involve the Provider demonstrating how they work with employers to determine the suitability of the MA framework to their job, and how the delivery of training will meet requirements. The *Partnership & Resources* standard is where evidence is captured of how the Provider works with the employer to agree the responsibilities of both parties to record the progress of the apprentice and how the apprentice is supported to achieve their overall goal.

The SDS Quality Assessor assesses the evidence provided through the self assessment process in terms of supporting documentation, and also interviews apprentices, employers and the Provider's management and staff in relation to the delivery of their training.

#### Planned enhancements

Further enhancements are planned to assure the quality of on the job learning. Given the nature of this subject, we believe that any enhanced process must be led and owned by industry and viewed as adding value rather than adding to any perceived bureaucratic burden which would potentially diminish the numbers of employers wishing to offer apprenticeship opportunities. In addition, with thousands of employers involved in employing MAs - and the vast majority of these are SMEs - any enhanced approach must be cost-effective and proportionate.

We have set up early discussions with representatives from two industries initially - Food and Drink and Hospitality - to gauge interest in and progress industry-led appropriate Quality Indicators and approaches for on-the-job learning. Our plan is that this would also include identifying and sharing good practice through appropriate industry communication methodologies.

I hope this provides the Committee members with the information they are seeking. Should you require any further information please do not hesitate to contact me.

Yours sincerely

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