

Ofsted Interview – Future Apprenticeship Programme

(December 2017)

- Louise: We've just had the recently the publication of OFSTED's annual report. Our plan today is to focus on the introduction of the standards through the reforms but if we could, more broadly with apprenticeships, are there any key points from the annual report that you think are worth sharing with people today?
- Chris: I think it's probably worth bearing in mind that of the inspectorate of 189 Providers in 2016/17 for whom we gave a grade for their apprenticeship provision 49% were good or better, 51% required improvement or were deemed to be inadequate. Now that does not compare well with the rest of the sector where last year more than, well let's say around 70% were good or better in their overall provision so some weaknesses around apprenticeship provision. Having said that one Provider accounted for 37,000 apprentices within the system. So, in a sense that, you know, if we took that one Provider out things would look a lot better.
- Chris: In terms of the overall picture. I think what we're also seeing is the move to standards is slow. That's partly because the approval rate for standards is perhaps not as quick as we might have expected it to be if frameworks are to be turned off in 2020. And I think one of the biggest concerns for us is the declining trend in the number of apprenticeships available at Level 2 and the falling numbers of 16 to 18 and 19 to 24-year-old apprenticeships, both of those were down by about 8 percentage points in their group. And while I applaud the shift to higher level apprenticeships I'm just worried about, if there is a ladder of opportunity for young people to get into the employment market then how do you get your first job if there isn't an apprenticeship at Level 2 and its Level 2 that you need? And obviously, we've got to remember round about 250,000 young people don't get five 4 to 9s. If they're not getting those English and Mathematics qualifications at Level 2 when they leave secondary school and a Level 2 Apprenticeship would have been the pathway today but because we aren't seeing the Level 2 Apprenticeships coming through we're just flagging that up as being something that we're concerned about.
- Louise: If you go down, into the detail, what stands out for me enormously how out of sync the percentages are in terms of requires improvement or inadequate for apprenticeships. As opposed to the wider FE sector. So, if we go back to that, how does that translate Chris into what you're looking for going forward in terms of how that provision could improve?
- Chris: Generally, if you look at the reasons why Providers are deemed to require improvement or being inadequate, it down to meeting the requirements of the apprenticeship. Too many either have no off-the-job training at all or don't have enough. Now Paul Joyce made it really clear back in February this year that we're not auditing the 20% or we're not auditing the safe requirements within the framework for the number of guided learning hours. But if we see that apprentices aren't developing the skills that they need to be effective in their work or if we look at progress reviews that say, you know, "Employer did not contribute to this discussion", "Employer cancelled the visit" and so on and so forth, then, you know, then we ask the questions, to the apprentice, are you being

given time off work to do your studies. And if we find that then that's when we start to dig deeper and start to ask the questions. So, it really is about making sure that learning and training are happening and that apprentices can, in a sense, develop their theoretical underpinning for the vocational and technical skills that they need to develop and then can be seen to apply those in the workplace. So, something about the relationship between learning, training and occupational skills are areas that we can improve. As well, it's about making sure that apprentices get the feedback they need to do better and too often we don't see that either. One of the biggest problems I have when I look at feedback or progress reviews is that apprentices are told "complete Unit 4, make sure you've done three cuts by the next time I see you." And it's, okay, that sort of lets us know that the apprentice is completing the assessments required to finish the apprenticeship, but it doesn't tell us or the apprentice about the skills that they're developing and what they need to do better. I'll give you an example, instead of completing Unit 34 it could be, "one of the things I've noticed is that when you're summarising meetings, that there are lots of spelling mistakes in there, you're not defining the actions that need to be taken. So next time you do that check your spelling before it goes out and make sure you record the Action Points and get that checked by somebody." You know, it should be much more specific about the improvements.

Louise: There is an ongoing regular debate about the inclusion or not of qualifications within Apprenticeship standards. One of the issues we've had historically, certainly in my experience, around the inclusion of the qualification is exactly what you've just described, that it becomes a very methodical route towards the achievement of a unit as opposed to the unravelling of what sits underneath it.

Chris: Precisely, precisely. So, with the best will in the world you can achieve all the qualifications you like but you might be not so good at the job. And it's that shift that I think the move to standards is helping us to grapple with and sort of say what is it that makes an apprentice good at their work? What makes them an effective employee? And it's not necessarily qualifications, it's about the knowledge, skills and behaviours that exemplify that occupation.

Louise: Anecdotally when we've met Providers who are relatively early adopters in delivering the standards because there aren't enough of them out there at the moment, that's been their feedback. Whilst they may have started their journey being concerned about not having the comfort blanket of the qualification, for argument's sake the NVQ, what they've found is it's improving their engagement with the employer and the quality of what they are driving the learner towards in terms of progress, because they're talking about the KSB's on the standard as opposed to achieving units. I think that shows a good early illustration of your point.

Chris: Well I can complement that in that we've just completed three pilot inspections where we've looked at standards only Providers, or if they were offering other things, all we looked at were the apprenticeships standards. There was definitely a big tick for employer engagement, absolutely. They were much more engaged than we'd seen perhaps in other offerings. What also was clear was that conversation around knowledge, skills and behaviours was often masked by the learner management systems

that were still too focussed around progress through qualifications or units rather than the knowledge, skills, and behaviours. So, I think my reflections on that are, now that I've finished those pilots, is that quite often with qualifications we assume that the knowledge, skills, and behaviours are being developed but there's no evidence for that. It might be serendipitous or chance that the apprentice developing the required knowledge, skills, and behaviours but if we're not measuring those then we don't know. So, you can complete the qualification units, if they're still there, but because the end-point assessment will be assessing knowledge, skills, and behaviours if you haven't measured those you don't know fully whether or not that apprentice is going to be ready for the end-point assessment.

Louise: And this is more just to reaffirm that message because again it comes up a lot. So, from your perspective, you're not auditors.

Chris: No.

Louise: You're not there to say somebody did 19.24% of off-the-job time versus having more than that in some way, have I got that right?

Chris: You have got that right.

Louise: Okay.

Chris: We will only dig if we don't see the relationship between quality work and quality learning and good feedback from the employer about what the apprentice is doing, only then will we dig down and start asking the question is there a relationship between not enough off-the-job training and the quality of work that apprentices are doing at work.

Louise: Thank you.

Chris: So that's when we'll dig.

Louise: I wonder if there would be a direct relationship between the level of the apprenticeship and the lack of off-the-job when you start to look at the numbers that you have seen last year and requires improvement and are inadequate, particularly at the Level 2 and 3 apprenticeships. I wondered if through your inspections last year if you had seen any relationship between lack of off-the-job being associated with a particular level of apprenticeship?

Chris: I'm not necessarily certain that it related to the level of the apprenticeship, it might well be related to sectors. That some occupational sectors that are less inclined to provide off-the-job training.

Louise: Now there are still some specific areas, and these haven't changed from the last time we spoke in term of where we find that Providers have a degree of concerns. Let's start with Maths and English and a Level 2 Apprenticeship. So, for a Level 2 Apprenticeship, just in case people aren't clear on this of course, we have a policy that requires Providers to ensure apprentices, without the existing qualifications, pass the Level 1 but of course have to sit the Level 2 test but they don't necessarily have to pass it. Now understandably though from a Provider's perspective they're really concerned about

that. So, the policy is stating that's what they have to do, we understand the sentiment behind that of course which is about the level of Maths and English that we have in our work force.

Chris: Yes?

Louise: But, their concern is, that's going to affect my success rates and when OFSTED come in does that mean that we run the risk of our grade being negatively impacted because of a policy decision?

Chris: I am out there publicly where I've said that I honestly believe that the policy will have unintended consequences. You just described those perfectly, for me, I think it's important that we recognise the challenge around it is that we won't know. Looking at the data around Level 2 English and Mathematics and how that relates to those learners or apprentices who took it and needed to pass and those who took it but didn't need to pass. Because those will be consolidated within that one set of data. I think it's important that Providers themselves desegregate that data. You really need to be clear on your data, your management systems need to be able to pull out for you that differentiation so that you can show, particularly for those that had to pass the Level 2 that the data maybe better or not than the overall data that's being presented. So, it's about Providers getting a handle on their own data while this policy still exists. But it does mean as Inspectors we have to be sensible about looking at that data because the policy is quite clear. Those apprentices who are on a Level 2 qualification need the Level 1 but have to study for and take but not necessarily pass. I think those are the words. So, what we'd want to see is that there was an effective learning programme for those young people to develop skills at Level 2 and that there was, in a sense, a clear maybe spikey profile of achievements for those young people so that we can see the progress from Level 1 to Level 2. Because what we want to avoid is policy driving practice which says to young people, ah well you've got the Level 1, that's fine. Now I'm going to put you in for a Level 2 test, but it doesn't matter. Without any support for that Level 2 test. Because our view is that if an exam is worth taking it's worth passing and any policy that says an exam is not worth passing is undermining the examination itself.

Louise: That's great, thank you Chris, that's good advice. Second one. This is about whether standards can have an element of negotiation at the outset between the employer and the Training Provider. I'm going to leave the end-point assessment organisations out of this one just for one moment. So that point of negotiation isn't designed just to be a monetary one. It's designed to be making sure that a standard that is relatively pliable, they're designed to be flexible to a point to be able to fit the employer's own context. How does it work for that particular employer with that particular organisation in that particular occupation job role that they're doing? So, particularly with some of the bigger employers, I expect we might see this less with the smaller ones. They will often have in place very robust training, they certainly don't want that to be duplicated in any way, so the decision is made that actually the employer will deliver some elements of the standard and the Provider will provide other elements but there's no money going to the employer, this isn't about funding, it's simply about not duplicating and making sure the apprentice's experience is good. So, the question we often get asked is, is does that mean that you're going into inspect the employer?

Chris: Well we're inspecting the whole apprenticeship. I think that should answer the question really, we're inspecting the whole apprenticeship not just bits of it. So therefore, if the employer is providing some training and, that training between the employer and Provider, you'll decide whether or not that's on or off the job. And we look at both on and off the job training and we'll have conversations with the employers, we'll, if there is training taking place show it to us, you know, if, if they believe it's strong and effective then in a sense what's the problem because it's the whole apprenticeship, not just the bit that the Provider is doing. Because it may well be that one of the decisions that we reach together during the inspection is what the employer is doing is adding real value to the knowledge, skills, and behaviours that the apprentices are developing, that makes them much more effective as employees. And, one of the things that we're really looking for is that strength of relationship between the employer and the Provider in ensuring that the apprentice gets access to the very best training, to become the very best employee they can be.

Louise: Let me flip that round the other way. So, let's say, when you come in and you look, let's assume it's a desktop, you look at the training the employer had committed to deliver and it's not very good. What, would you, because this is about practicalities isn't it? About supporting, when our Providers are listening to this we want them to think about the practical things they can do about it. So, if that scenario came up what would you be expecting a Provider to be doing or looking for in order to resolve that sort of situation?

Chris: In a sense, if one of the outcomes of that is that the apprentice isn't developing the skills they need because the employer isn't playing ball so to speak then because we're inspecting the Provider. The Provider, may well feel that they're the ones taking the heat because they have a recalcitrant employer. So, in a sense what we'd want to see or what the Provider would need to demonstrate is that they were pushing back on that, that there was evidence of meetings and conversations, an email trail perhaps, that says look, you know, you've signed up for this, this is what our agreement was about. We're doing this, you need to make that you're doing that because that's the requirement of the apprenticeship. By and large it will be the Provider that knows more about the regulations around an apprenticeship than some employers who may well be new to the system. So, it's got to be about, in a sense, the Provider under those circumstances holding the employer by the hand and giving them the guidance they need. If we see that and yet the employer is still not playing ball, then we'd probably reflect that in the inspection report. One of the things we haven't done very much of in the past is to name and shame sub-contractors, we might list them on the back page but in a sense, don't say anything. We might talk about employers or we might talk about sub-contractors but now I think, if a major employer is not playing ball in the apprenticeship and because they are, if they're a levy payer and are funding it then we should name them in the inspection report.

Louise: Thank you, that's really interesting. The bit I just want to go back to again, I'm just paraphrasing what you said because I think it's so important, was that that piece around the guidance at the outset because, like you said, the Providers carrying the can really, they're the ones that are at risk so your negotiation at the start point needs to be robust and often that negotiation won't be with the Trainer, it will be with someone that's called a Business Development person who has targets, who has responsibilities for bringing new business in but their role in the quality of the apprenticeship itself and standards is more important I suspect than it's ever been before.

- Chris: Absolutely, sort of contrary, it's about signing contracts and saying, you understand the requirements of an apprenticeship. This is the IFA Quality Statement, these are the rules, the funding rules the ESFA have published, these are the things they have to meet, tick and sign to say that you understand those and how it applies to you. And it's the whole due diligence process really, you do that with awarding organisations, now it's about making sure you have those systems in place for employers.
- Louise: Timely completion.
So, we've now got the introduction of the gateway and end-point assessment. So, from the Training Providers perspective historically they would have been predicting when the apprentice would have completed or would be completing their apprenticeship and there is a fairly serious degree of measurement around that in making sure it's accurate. And I appreciate some of that is ESFA territory, but it is something that features when you've been inspected. Whereas now we have a scenario whereby anything that happens after the gateway with the exception of perhaps additional training needs if the apprentice didn't pass it is not within the control of the Training Provider at all. The only thing they can control is up to the point of the gateway. How, going forward, do you intend to treat the notion of timely completion?
- Chris: Well while numbers are small I think you talked about the comfort blanket of qualifications, I think we're losing the comfort blanket of data. In terms of making judgements about overall achievement. We'll still have minimum lengths of duration because the standard will set that. So, in a sense then we've got to be mindful of those and we'll be asking questions about that preparation for the minimum length of duration. But I think one of the things that standards give us, and I think the levy gives to us as well, is some flexibility around the end because you may determine, as you look at the progress an apprentice is making that actually they need longer.
- Chris: They need longer before the gateway so, we've set the minimum duration, then there may be some flexibility as you measure progress throughout the apprentices' time to flex when the gateway is there. And you're quite right, the only thing that we can measure and have a serious discussion about is that determination by the employer and the Provider that the apprentice is ready to take end-point assessment. That is what's in control. We can't, you can't, control necessarily the availability of end-point assessors to be available when you need them to be. So, the conversation should be, and perhaps the internal record keeping is the data showing the end-point assessment was booked. Not when it happens but the date it's booked, was that within gateway? Was that within the minimum length of duration or the duration, the apprenticeship determined for that individual. That means, I don't think it's going to be that easy then to have a National set of data about timely completions with standards.
- Louise: And I think, coming back to the practical, what can I do about it as a Provider, there is something you said that struck me as really important, which is by tracking the learners progress you realise perhaps that you have overstated when you think that they're going to be ready and they do need longer. It's the record keeping of when those discussions took place, why they took place and what additional support is happening in order to get them to move to where they need to be. Would that be a reasonable unpicking of that?

Chris: I think that is certainly reasonable and I think also you could apply that to any discussions about whether or not the apprentice is pass, merit or distinction. And the support mechanisms you put in place for apprentices who show potential for distinction. How do you differentiate their training? What additional support are you giving them? What about those that may well be on the borderline of merit and distinction? You know, I think there are nuances that the records probably need to show, that we aren't showing currently because within frameworks we don't work that way.

Louise: Sure. So, the grading it, we had very few assessments take place so far but we're going to see a huge jump in that next year. Because of the numbers on standards but also, we're hitting some of the shorter programmes now as well.

Chris: Exactly.

Louise: So, your interest as an OFSTED Inspector in the grading, how do you intend to use that, to inform some of your decisions or inform some of your discussions.

Chris: I think the key thing is that relationship between the identified and recorded initial assessments. What did we know about the apprentice at the beginning of their apprenticeship? What knowledge, skills and behaviours did they bring with them and what does that tell you about their future potential. Can you make predictions at the beginning based on their GCSE average point score, their initial skills assessments or their English and Mathematics? Is that giving you a feel of the potential for that apprentice? At your review points throughout the apprenticeship should also give you indications about how, not just how quickly the apprentice is making progress in developing the knowledge, skills, and behaviours but how well they are developing those. Because, in a sense, if an end-point assessment is graded, and that's where the grade comes from, you'd really want the Training Provider and the Employer and the apprentice to know that potential there was and that the award of distinction wasn't a surprise. You know, someone says 'oh I got a distinction, I wasn't expecting that'. Well actually you should be expecting that if that's the support that you've been getting through the apprenticeship. So again, I talked about feedback earlier, it's about how does the feedback that the apprentice gets, help them to make progress towards the grade in the end-point assessment? We know about grade boundaries, we know what the attributes that young people need to demonstrate in their qualifications. Well I think we're going to have to have those conversations in vocational and technical areas as well.

Louise: I agree and it's interesting for me because you're raising a point around it, the academic side of it that when we've spoken to some Apprenticeship Providers they've said how can I possibly predict at the beginning of a twelve-month apprenticeship where they'll be at the end in terms of grading. And my response to that is well we predict when they're four years old how they're going to come out in a SATS result when they're eleven.

Chris: Exactly.

Louise: There's some real opportunities for learning I think between schools and further education and not just schools and FE because we do it in A Levels. There's lots of other illustrations of that where that rigor around progress monitoring with a milestone in place, how are you moving, how do we demonstrate it, is common elsewhere. I think that's quite exciting.

Chris: And that's interesting because I had a conversation with Paul Joyce, the Deputy Director about me shadowing some primary inspections. Because I had the same thought. He said well how do you measure progress without qualifications? I said well they do that all the time in the Primary Curriculum. All the time, that is there, that's their meat and drink. I think it's perhaps important I haven't been into a Primary School for a long time because I used to do a lot of work in Primary Schools so I just, I need to get my head round that for a primary inspection perspective about what is it that we do to measure progress when there are no qualifications. And it's all about the knowledge, skills and behaviours or characteristics in a Primary School and we're applying that now to apprenticeships and I think it's an interesting link.

Louise: It is. So, let's keep with that illustration because I think the other interesting thing for me, is when you look at the downside of that. And certainly, Amanda Spielman has talked very much about measurement of progress as opposed to the emphasis on outcome. So, I'm going to take, Year Six, that's ten, eleven-year olds as an illustration, I think what she said in the report is that there is a real concern around, in some cases the whole of the last year being dedicated to getting children ready for a test. So, do we run the risk of repeating that within an apprenticeship with the end-point assessment coming to fruition?

Chris: Hopefully not. I mean a challenge for Apprenticeship Providers is that too often we don't know what the end-point assessment looks like, so we can't effectively necessarily prepare apprentices for a test that we don't know much about. My view is, and always has been, that good teaching that builds progressively on the knowledge and skills that people develop leads to good outcomes and it's that diagnosis constantly of where people are.

Louise: Sure.

Chris: And, I think it's the same in apprenticeships. Make sure your identifying gaps in knowledge skills and behaviours early so that you've got strong foundations on which to build. And therefore, it is about ongoing review, ongoing assessment, checking for gaps, filling those gaps and that sort of constant preparation and that's about good curriculum design. Not about working towards a test.

Louise: We'll know more about this when we get a couple more years into it?

Louise: The more familiar that people become with the end-point assessments, does that run the risk of narrowing the curriculum because we know more or less what's going to come up at the end. And I suspect we'll be having a discussion at that point about how we safeguard against this.

Chris: I think one of the challenges we all face if we look at the system holistically is that when we look at the standards that are there the end-point assessments are all so different. If it's a portfolio or if it's a professional discussion there are two we know more about in some respects, I'm not too concerned about the professional discussion because what that means is that if you haven't developed those knowledge, skills, and behaviours you're not going to be able to engage in that professional discussion. So, you know,

there's got to be a broad set of skills there. If it's a competence test, then do you just learn those competences then? Are those the things you concentrate on and then forget everything else? You know, that's the danger.

Louise: To clarify OFSTED, have no role at all in inspecting end-point assessment organisations?

Chris: No.

Louise: Regarding Higher Apprenticeship territory Chris, there is a crossover of course with QAA, with FE. Can you say a little bit more about how that's going to work?

Chris: I can certainly. QAA FE office for students will have responsibility for Degree apprenticeships. We won't look at apprentices at Level 6 and above. Our remit goes from 2 to 5. Therefore, we will inspect apprenticeships from Level 2 to Level 5. The blur comes when the Levels 4 and 5 apprenticeships contain prescribed higher educational qualifications. From my analysis of the standards that have been approved and are ready for delivery, that's only a very small number of those apprenticeships. What we will do is to look at and share data between OFSTED and QAA FE office for students and, for example, look at the QAA dashboard for a Provider for a programme and making sure we will share that. We will inspect Level 4 and 5 we will inspect because that's our statutory remit, but we will take the data and the guidance from QAA to, in a sense, see how as part of that joint working. I will say that we are doing a pilot joint inspection, so QAA are going to follow their processes and we will follow ours and then look at what happens. We're working with a friendly university to carry out a pilot. I think we're doing one in January.

Louise: Okay, that's great.

Chris: And then obviously after that we will be able to talk much more clearly about how it works and how the process is working.

Louise: My last question is, just even through our conversation you know, it's clear that there is a different expectation through inspection on inspectors. An inspector can be inspecting a Provider who is delivering frameworks or inspecting one that's delivering standards. How are you, let's just use the term, CPD. So what CPD would I have if I was an inspector to help me to move with the landscape that we're going into now?

Chris: Okay. Inspectors have already had a fair bit of training about the differences, the difference in terms of the expectations about the whole business that we're not auditors so there's been some clarity around that. One of the things that we are doing is to make sure that we have a repository of all the standards and all the assessment plans so that a Lead Inspector doesn't have to go to the .gov.uk website to find the standards and what we'll be doing is grouping them in routes so that it's easier, with the three pilots one of the things I noticed is that Providers tend to call them something different from what's on the .gov website and therefore, you know, I want to avoid the, let's say an Inspector turning up to an inspection having briefed themselves on the wrong standard. So, I want things to be very clear about the expectations of standards of apprenticeships. We've also amended the inspection handbook to begin to account for the changes. We changed

it for September last, this year to account for knowledge, skills, and behaviours but we have to write it currently in a way that recognises that still around, probably 90% of what we're delivering is frameworks. And that we can't jump wholesale into standards until standards become the majority programme. What we're also requiring Inspectors to do is where they see standards and frameworks, to make it really clear in their writing, in their observations sessions, in their tracking of progress that they clearly differentiate and explore framework standards levels and so on. So, it's very clear. What's happening within that Provider.

Louise: That's great, thank you. It's good to hear that the pilots have started, that in itself is going to provide lots of case study material I suspect for how you keep reinforcing some of those messages to your team.

Chris: Yeah absolutely. And I think one of the key messages, I mentioned this before in our conversation this morning, is that for me that comfort blanket of data is gone. We should no longer, around apprenticeships look back at data that could well be 18 months old and begin to draw conclusions. We kind of do that with standards anyway because most of them are new and will have no data so it has to be about progress from starting points, you know, and answering the question what does an apprentice know more about? What can they do now that they couldn't do before or what can they do better as a result of their training and how have their behaviours changed as a consequence of the apprenticeship and do they know, because of the progress that they've made, what potential they have in terms of the end-point assessment and what their future career might look like because they're beginning to develop these knowledge, skills and behaviours. So, it's a much more rounded view of an apprentice rather than just, or an apprenticeship, rather than just a case of oh well last year the achievement rates in this area were 64%. And this year they're 62% therefore things aren't as good as they were. Well we're not in that ball park anymore.

Louise: Chris, that's great. That seems like a good place to end. Have you got any, any final thoughts at all that you think I haven't covered or I haven't asked you about that you would want to share with the Providers on the Future Apprenticeships programme?

Chris: No, I think we have covered everything. I would just say focus on progress, progress, progress and let's leave it at that.

Louise: That's brilliant. Thanks so much Chris, thanks as always for your time.

Chris: Thank you very much.

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