Consultation Questions:

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

***Agree*** *– The Chartered Institute of Building (CIOB) is an awarding organisation for a range of national vocational qualifications and apprenticeships. Similarly, CIOB accredits foundations (FdSC), undergraduate (BSc) and postgraduate (MSc) programmes with universities and other higher education institutions around the world. Accreditation is essentially CIOB’s seal of approval for the teaching institute and signifies that the qualification teaches the highest standards, equipping individuals with the skills, knowledges, and behaviours for a career in the built environment.*

*CIOB recently entered the degree apprenticeship market, to raise the profile of apprenticeships, and provide reassurance to employers that apprenticeships reform, and the end-point-assessment, is a positive change for the construction industry. By delivering end-point-assessments, this instils confidence in employers by guaranteeing the apprentices receive impartial, robust, and fair assessment, meaning they can hit the ground running from day one of post apprenticeship employment.*

*We therefore agree that qualifications should be mandated where they fulfil a regulatory, professional body, or labour market requirement. However, we believe further consideration should be given to mandating licenses to practice for industries like construction, as is the case in Germany for example. This would professionalise the industry, raise standards and improve the quality of the built environment.*

*Nevertheless, while we agree with the above statement, we are concerned about who delivers the mandatory qualifications – e.g., the university or the employer – if it is the latter, we urge a reconsideration of funding formulas, to ensure that the employer responsible for delivering mandatory qualifications is not financially burdened.*

*Similarly, we seek clarity on how regularly mandatory qualifications are updated, for example, to reflect labour market changes, and legislation?*

1. To what extent do you agree that qualifications which provide ‘fuller occupational coverage’ or provide structure for off-the-job training should not be mandated on this basis alone?

***Strongly disagree*** *– CIOB are an end-point-assessment organisation. If mandatory qualifications include ‘fuller occupational coverage’, this will inevitably increase the amount of Knowledge, Skills and Behaviour (KSB’s) CIOB would be required to assess. This adds significant costs to end-point assessment organisations (EPAOs).*

1. To what extent do you agree with our approach to include more specific evidence criteria when mandating a qualification due to regulatory or professional body requirements?

***Strongly Disagree*** *– Apprenticeship Standards are designed to have a flexible approach in order to meet the needs of varying employers. If specific evidence criteria were incorporated into mandatory qualifications, employers would have to change the way they operate to ensure their apprentice is trained across all the relevant KSB’s.*

1. To what extent do you agree with our proposals for requiring evidence of labour market demand for a mandatory qualification?

***Strongly Agree*** *– As a professional body representing the construction industry, we are increasingly aware that technology and innovation are significantly changing the face of the industry. Digitisation, robotics, and artificial intelligence for example, mean that the industry is no longer dominated by onsite manual labour, rather, it is in industry which provides a range of careers, covering a wide range of disciplines and skillsets. To adapt to such advancements, and evolve at the same pace as the industry, mandatory qualifications should be regularly reviewed, and therefore flexible in nature.*

1. To what extent do you agree that where a qualification has not been approved through any current or future approval process, that outcome should inform decisions about its suitability for use in an apprenticeship?

***Strongly Agree*** *– All qualifications should be regulated. This has benefits for everyone, including the training provider, learner, and awarding body, as it represents that learners have been thoroughly evaluated, assessed, and quality assured to be deemed competent, skilled, and knowledgeable.*

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

***Strongly Agree –*** *This would provide clarity to the apprentice and enable consistent progression pathways into higher education and/ or employment upon completion of the apprenticeship and mandatory qualifications.*

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

***Strongly Agree*** *– Qualifications must align with the KSB’s set out in the occupational standard.*

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

***Neither agree nor disagree*** *– CIOB believe mandated qualifications should be at the same level as the occupational standard.*

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

***Strongly disagree*** *- CIOB are concerned that if the assessment of mandated qualifications is integrated into the EPA, this would put additional pressure on EPAOs (cost of developing additional assessment materials and time taken to deliver assessment). If this were the case, EPAOs would need to increase their percentage of the funding to make it financially viable and CIOB would need to increase the fees we pay our assessors.*

1. We have identified some scenarios in which integration might not be appropriate or possible. If you have further examples, please provide details to support our policy development around integration.

*CIOB are not a training provider, so are unable to provide examples.*

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

***Strongly disagree.***

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

***Strongly Agree*** *– The defined set of KSBs cannot be assessed by multiple smaller qualifications, as such qualifications do not necessarily demonstrate competence, rather qualifications are hypothetically based.*

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

***Strongly disagree.***

1. We have set out our preferred approach to integration and one we know to work. We would welcome your thoughts on how this approach might work for you and any alternative modes of integration you might wish to propose.

***N/A.***

1. To what extent do you agree that the EPA’s assessment plan should indicate which of the integrated qualification’s grade boundaries should attest to occupational competence?

***Strongly disagree.***

1. To what extent do you agree that awarding bodies setting the qualification’s integrated assessments is the best way to protect the independence and reliability of the EPA?

***Strongly Agree*** *– CIOB is an awarding organisation. We believe that, by delivering EPA’s, this instils confidence in employers, by guaranteeing the apprentices receive impartial, robust, and fair assessment, meaning they can hit the ground running from day one of post apprenticeship employment. In short, this upholds standards in the built environment and provides opportunities for apprentices to gain direct routes into chartership, which enhances their future career prospects.*

1. : To what extent do you agree that it is fairer to apprentices if we do not allow awarding bodies to permit centre adaptation of an integrated qualification’s assessments?

***Disagree.***

1. To what extent do you agree that, for integrated written and on-screen assessments, at least one assessor must be independent in accordance with the description in the proposal?

***Strongly Agree*** *– Having at least one, independent assessor, upholds the reliability and rigour of an EPA, as well as guarantees impartiality in assessment, and comparability of assessment decisions.*

1. To what extent do you agree that integrated practical assessments must be conducted by a person suitably qualified to make assessment judgements, but who has no vested interest in the apprentice’s or the assessment’s outcomes?

***Strongly Agree*** *– Having at least one, independent assessor, upholds the reliability and rigour of an EPA, as well as guarantees impartiality in assessment, and comparability of assessment decisions*

1. To what extent do you agree that, where such arrangements would present significant challenges to a centre, the tutor who has delivered the content may deliver the integrated assessment, provided they are joined by at least one other assessor who is sufficiently independent. Please provide examples of any potential challenges in your response, where applicable.

***Strongly Agree*** *– While allowing EPA’s to be delivered in-house by the training provider may have a positive impact on apprenticeship completion rates, it does not uphold rigour, or impartiality in assessment.*

1. To what extent do you agree that assessments must be marked or graded by the awarding organisation, independent persons appointed by the awarding organisation, centre staff with sufficient independence, or a combination of the above?

***Strongly Agree*** *– CIOB is an awarding organisation. We believe that, by delivering EPA’s, this instils confidence in employers, by guaranteeing the apprentices receive impartial, robust, and fair assessment. In short, this upholds standards in the built environment.*

1. With reference to the General Impact Assessment (Section 4.1), are there any other impacts, including costs, savings or benefits, which we have not identified? Please provide examples, data and/or evidence where possible.

***Yes*** *– There is likely to be a significant cost implication for EPAO’s, and assessors will be required to assess more criteria, which is more time consuming, and costly to EPAO’s. Perhaps consideration should be given to the formula of the Apprenticeship Levy, so that more funding goes to the EPAO.*

1. With reference to the General Impact Assessment (Section 4.1), are there any additional steps that could be taken to mitigate any negative impact, resulting from the proposed approach to approvals? Please provide examples, data and/or evidence where possible.

***Don’t Know.***

1. With reference to the Equality Impact Assessment (Section 4.2), are there any other potential impacts (positive or negative) that have not been identified? Please provide examples, data and/or evidence where possible.

***Don’t Know*** *– CIOB believe that if reasonable adjustment and flexible assessment policies are upheld, then fair assessment is open to all.*