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

**We have to be clear, when we talk about ‘substantial’ what we actually mean. In the automotive retail sector, all Apprenticeship frameworks are developed to match occupations, with the view that the Apprentices will be new into the job role. For the Level 3 Apprenticeship programmes these are developed with the view that the learners have already been equipped with the Level 2 skills and so on. The Apprenticeship frameworks are designed with progression in mind.**

**What we need to ensure, is that enrolments on Apprenticeships are for learners new to the role and occupation, rather than those who have been in the role for some time and are simply using the Apprenticeship as a route to accredit what learners are and have been doing for some time.**

**Again when we talk about new skills, are we also considering new knowledge that is being acquired? No matter of the answer, what is clear is that employers must be absolutely central to influencing a sector standard on the new skills that a learner undertaking a new role/occupation would need to know and what the Apprenticeship qualification should contain.**

2. The Richard Review recommends that every Apprenticeship should be based on employer-designed industry standards. It recommends that these new standards should focus on outcomes and mastery of the occupation or major job role, and should replace Apprenticeship frameworks, the current qualifications which comprise them and the national occupational standards which underpin them. The new standards would set out simply and clearly what employee in that occupation or major job role will need to be able to do.

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

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

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**It is the IMI’s view that we really should learn from experiences here and almost ask ourselves why do we reinvent the wheel if things are still working well?**

**For the automotive retail sector we fully engage with employers over the National Occupational Standards (NOS), qualifications and Apprenticeship frameworks to ensure that they meet their needs. We engage a wide range of employers to ensure that they will also meet a broad spectrum of business types and sizes who might have similar roles and we believe that, as the professional association for the automotive retail sector, this works extremely well. What we are clear on, is that the employers need to be brought together to work on products like NOS and Apprenticeship frameworks by impartial employer-led organisations, otherwise there is the fear that they are being sold something and they may disengage.**

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The IMI are also firm in the belief that we must guard against unnecessary proliferation in the sector, particularly with the qualifications and standards. What we are fearful of is that, without this impartial organisation guarding the standards, is that we will end up with a proliferation of products with slight variations leading to a confusing and convoluted skills and Apprenticeship landscape, which would not be to the benefit of the learner or of the employers.

In addition, the IMI believe that consultation with awarding organisations is key as the employers and training providers are their customers, and so they receive much of the feedback on the National Occupational Standards, qualifications and Apprenticeship frameworks.

Currently the IMI engage with employers through a number of different ways, through face-to-face meetings, surveys, and through the trade press and membership magazines (the IMI being the sector's professional association and membership organisation). This works very well, however, when we are talking about National Occupational Standards, qualifications etc, we sometimes find that employers look to the IMI to break down the perceived barriers and complications of the skills arena and the sector, especially in relation to jargon etc. We already have the panel of employers through these fora, and acting as the facilitator, the IMI can continue to bring together representation on the sector to inform the Apprenticeship frameworks.

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

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

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

The criteria seems absolutely right, but, the IMI would question why all the criteria above isn't already dealt with in the SASE-compliant Apprenticeship frameworks – as this is what we have been working towards as the sector body and as the industry over the last few years. After all these changes, if the above criteria are met, and if not carefully communicated, it would seem that we were reinventing the wheel and, rather than engage employers, we are likely to lose employers' buy-in. The IMI absolutely agrees that it is critical that Apprenticeships are real jobs, not generic skills, and carried out in the work place with the full support, and potentially partial assessment by the employer, without this we are not dealing with an Apprenticeship, but rather a training scheme.

4. The Richard Review recommends that there should be just one Apprenticeship standard and qualification for each occupation or major job role. He proposes that these should set

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out what an Apprentice should be able to do and know at the end of their Apprenticeship, in a way that is relevant and meaningful for employers.

The government recognises the strong arguments set out in the Review that there should be only one standard. We also recognise that for some sectors the nature of individual jobs may vary significantly between employers, even for job roles that are nominally the same. We need to find a solution to take account of this – for example through a “core and options” approach for each standard and qualification, increasing their flexibility to different settings and contexts whilst ensuring a rigorous core of essential knowledge and skills.

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

Yes

No

Don't know

**Please explain your response:**

**Yes, the IMI believes there should be one standard per job role. What we do think, however, is that this standard could apply to more than one job role. For example, what currently works very well is where standards are flexible and you can draw on generic areas that apply to more than one job role, but then enable the learner to specialise via other standards through ‘options’. It would be a real shame if this flexibility were lost, and would cause much duplication across Apprenticeship qualifications and standards. On behalf of the sector we would be concerned if there were unnecessary proliferation and duplication.**

**What we also firmly believe is that the ‘standard’ could be made up of different levels. For example, you may have elements that are of a lower level and some of a higher which is reflected by a ‘spiky’ levelling profile in the qualifications. Indeed this standard should also be flexible enough to identify the differences in roles across employers of different sizes, but also that apparently similar roles across different employers might differ to some extent. For example in retail, you may have a sales assistant working for one retailer who has a different set of competences to another retailer, and indeed to that of a smaller retailer.**

**Much of this is currently the case in the automotive retail frameworks, ie one framework for one occupation, but that through the selection of units you have frameworks that apply to more than one job role. What we feel makes this work extremely effectively is the conduit between the employers and the awarding organisations. For example, currently, the IMI agrees the units and Rules of Combinations with the awarding organisations who then adopt these and apply them to their own qualifications. Through this we can ensure that there is consistency of the qualifications across different awarding organisations over the substance of the content. The IMI believes that this effective working practice should be maintained moving forward.**

5. The Richard Review recommends that there should be just one Apprenticeship standard and qualification for each occupation or job role. And that these should set out what an

Apprentice should be able to do and know at the end of their Apprenticeship, in a way that is relevant and meaningful for employers.

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

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

Yes

No

Don't know

Please explain your response:

**The IMI believes that provided this qualification is flexible enough to cover all the areas that the spectrum of employers might need (eg a role in an SME might be different to that in a multi-National organisation) then there could be one qualification per standard. If this flexibility was built in to the Apprenticeship qualification then this standard could be adopted by many Awarding Organisations (AOs then regulated by Ofqual) and you would not limit this, necessarily to just one AO.**

**It has for many years been the case that AO's no longer compete on the content of their qualifications, but rather the surrounding offer (eg pricing, customer service, product surround, e.g. teaching resources). What you need for this to work, however, is an impartial employer voice to ensure that the content meets the needs of a collective of employers, and as such an employer-led body works well. This is currently the practice and role that sits with a Sector Skills Council.**

**Where the complications might be presented is where you have combined knowledge and skills-based qualification which are then graded. This is not such an issue for the knowledge parts, but for the competency this might present issues. This has long been a debate over demonstration of competency, and whether, having demonstrated competency you can then go over and above to demonstrate mastery of skills.**

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

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

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



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

The IMI would question, particularly for the automotive sector, how this is not currently the case? All of the current qualifications and Apprenticeship frameworks are developed in consultation and collaboration with a range of different employers. This works extremely well, and ensures that we have a coherent set of Apprenticeship programmes that meet the needs of the sector, but that also keep up-to-date with developments in the sector, such as new technologies or emerging practices. This is one element that should not be lost moving forward because, whilst it is one task to develop an Apprenticeship standard, it is another to continually ensure that the Apprenticeship standard remains current and up-to-date and move with the fast-paced changes and requirements of job roles within the sectors.

Whilst there may be a transition period as we move forward with adopting the Richard recommendations, employers must be kept at the heart of all of the changes, and we believe that sector-led bodies who remain impartial are best placed to continue to engage with the employers and therefore represent the sector's needs. Previous experience has told us in our sector that employers have not wanted to develop their own frameworks, and so we need an impartial body to undertake a facilitation exercise keeping employers in the sector on board, but also to ensure that they effectively design and accredit the Apprenticeship standards.

The IMI are also mindful, that over the last few years particularly there has been a great deal of change in the Apprenticeship landscape, with the introduction of the Specification for Apprenticeship Standards in England (SASE) which triggered additional requirements, such as the Personal Learning and Thinking Skills etc, and the changes to minimum duration etc. What we would therefore call for is a period of stability in the Apprenticeship landscape to enable any new requirements to 'bed-in'. We are also mindful, that the proposed changes to Apprenticeships 'qualifications' could be a great deal of work for all organisations involved, and therefore we are not looking at a solution that could be developed and implemented in a short period of time, but in actual fact we are looking at at least a couple of years development work.

The IMI believes, however, that we are well placed with the Automotive Retail Apprenticeship frameworks, and with the industry-led 'defacto' standards through the ATA and AMA\* accreditation schemes (these could link to the Apprenticeship qualifications, and could inform the summative assessment, linked to the qualification). We therefore believe we are in a position to 'pilot' some of the recommendations in a relatively short timescale, and feed back to the Department of Business, Innovation and Skills as to the progress of this pilot. We would welcome the opportunity to discuss this in further detail. What we would certainly want to guard against is any unnecessary "reinvention of the wheel", preferring instead to build on the best practice and what currently works with Apprenticeships in the sector.



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**\*ATA (Automotive Technician Accreditation) is an industry standard benchmark of skills. An ATA accredited individual has proven their capability at performing the skills within the job of their specialism.**

**AMA (Automotive Management Accreditation) follows the same model as above, but is aimed specifically at Management level employees.**

**All ATA registered individuals are skilled, tested and regulated. The ATA scheme is governed by the Institute of the Motor Industry (IMI) who are the professional association and Sector Skills Council for the retail automotive industry.**

**ATA was established in 2005 and has developed to incorporate 16 automotive disciplines. Each route's content and structure are frequently reviewed to ensure they remain relevant and current to support the skills need in the sector.**

**For more information on the ATA scheme please visit: <http://ata.theimi.org.uk/about-ata>**

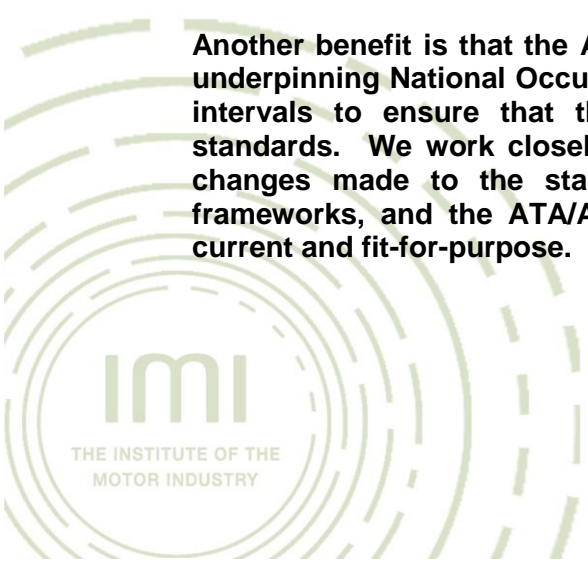
7. Once the new Apprenticeship standards are agreed it will be important that they remain rigorous, stretching and relevant to employers.

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

**As previously mentioned, the IMI as an industry membership organisation, providing skills accreditation through the ATA and AMA schemes, believe that there could be much synergy between the current ATA and AMA schemes (which are industry-led and also the 'defacto' licence to practice for maintenance and accreditation of skills) and any new standards, if this is the direction that the Apprenticeship policy goes. The sector endorsement and use of the schemes proves they are working, and we believe that there could be much synergy between this recognised scheme and the Apprenticeship 'qualification' moving forward.**

**This would need to be explored in further detail, but the IMI would be more than happy to work with stakeholders to review this, and explore how the summative assessment for an Apprenticeship qualification could be linked to the sector's ATA and AMA schemes, and also to professional recognition through the IMI's Professional Register, and the membership association.**

**Another benefit is that the ATA and AMA accreditation schemes are linked in to the underpinning National Occupational Standards (NOS), which are reviewed on regular intervals to ensure that they remain current and up-to-date with the industry standards. We work closely with employers in the sector to ensure this, and any changes made to the standards are reflected in qualifications, Apprenticeship frameworks, and the ATA/AMA accreditation schemes to ensure that they remain current and fit-for-purpose.**



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**What we would say, however, is from the employers' point of view in our sector – the current Apprenticeship frameworks are fit-for-purpose, and as such we are very concerned that we will be potentially making change for change's sake.**

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

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

**What is the carrot for employers to get involved? That is key. Again, we have to realise that (apart from funding drivers) that this is, in the majority of cases, not part of their business aims and objectives and we sometimes have to 'sell' the virtues of Apprenticeships through demonstrating the positive return on investment of taking on apprentices.**

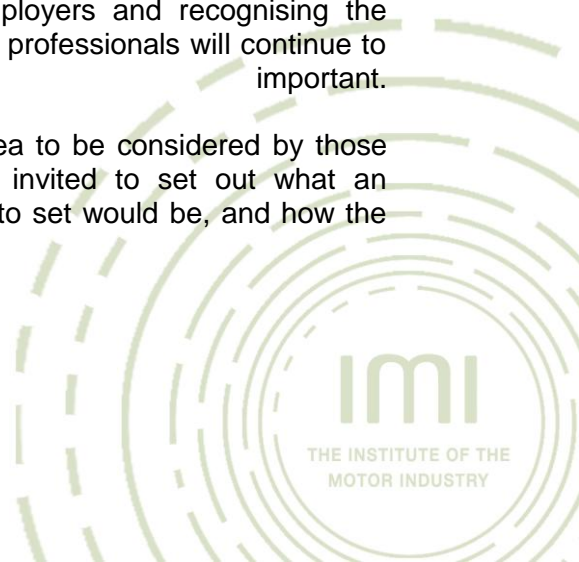
**It is absolutely key that employers are at the heart of the development and continuous review of Apprenticeships, but we have to also ensure that the employers don't get swayed by other stakeholders with monetary agendas. We also have to be mindful that, with the potential for funding to go directly to the employers via tax or NI incentives, that this does not present unnecessary problems or complications. For the automotive retail sector, this could become an issue where certain manufacturers/dealerships have business hubs across Europe, and where they are scrutinising the financials of the organisations based in England. Also, with the majority of employers in our sector having less than 5 employees, it is not at all clear that they will accurately account for the credits and apply them as intended.**

**Again, we see great synergy between our ATA/AMA accreditation schemes which are recognised and valued by the sector, and we believe a key would be linking the Apprenticeship qualification to these sector schemes, and also the IMI's Professional Register, and the membership association.**

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

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



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## Question 9: How could employer's best be involved in the practical delivery of assessment?

**There is no-one better placed to say whether an employee is competent or has the right skills than the employer or line-manager. This has worked very well in other sectors where the employer has taken on the delivery of some of the skills, but also the assessment of the learner – ie are they competent, and do they have the skillset? We do believe, however, that there should always be some form of external quality assurance to ensure that there is comparability across learners, employers etc.**

**If there was an end of programme assessment, then we believe that some form of learning journal that is witnessed by the employer could be an ideal solution, which will track the learner's progression throughout the programme. The reason for the learning journal is that, particularly for the engineering sectors, the programme durations could be quite long, and if it is suggested that there is only an end of programme assessment we should still capture the learner's journey which could then be witnessed or evidenced by the employer.**

**Where we do have concerns is that it would be tremendously challenging, almost impossible, to operate a complete end of programme assessment on learners. This is because of the breadth and depth of the assessment requirements, currently supported by the sector, which require learners to work on real faults on customers' vehicles. Whilst employers currently have involvement in this assessment, trying to assess at the end of the programme and having sufficient opportunity for the learners to demonstrate these skills in a short period, in the workplace, would be virtually impossible. The only solution would be to investigate some form of skills test in a simulated environment, but this would involve much discussion with providers and employers to see if this was an option. This would only partly address the issue, however, and we believe that this could provide a major barrier to employers engaging with the Apprenticeships if this were to be adopted without some flexibility.**

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





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

The IMI believe that the use of impartial, employer-led bodies such as Sector Skills Councils, has contributed greatly to the independence of the standards that underpin Apprenticeships. Working with awarding organisations and other stakeholders, sector-led bodies have then contributed to the qualification standards and content to ensure that this consistency, and agreement across awarding organisations, has been maintained. For competence-based qualifications, this has worked extremely well through the Assessment Strategies, which are maintained by Sector Skills Councils, but, with agreement of Awarding Organisations and act as a standardisation of assessment criteria for vocational qualifications of the sector.

What also works extremely well is where, through awarding organisation forums, facilitated by Sector Skills Councils, any issues relating to assessment and barriers to assessment are discussed, and solutions identified as a group (and then articulated in the Assessment Strategy or unit/qualification specification as appropriate).

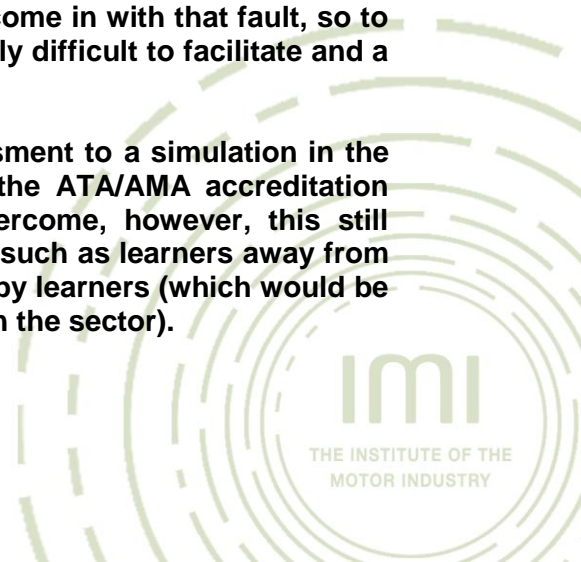
It is agreed, however, that more work could be done to support further consistency, and the IMI would say that this is through further joined-up collaborative working with awarding organisations, but also through further detailed consultation with the sector (employers and providers), and the qualification regulators, Ofqual.

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

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

The IMI believe that this presents severe challenges for the sector, particularly around any competence-based elements that are to be assessed in the work place. Currently, the competence-based qualifications have elements spread over 2 or even 3 year periods and this is fit-for-purpose for the sector. To try and condense this into an end point assessment into a comparatively short-window, would be almost impossible for employers to implement. For example a big part of the assessment requires learners to work on customer vehicles, in the real working environment, with specific faults, and as such it cannot be guaranteed when a vehicle will come in with that fault, so to have an end of programme assessment would be extremely difficult to facilitate and a major barrier to employers and providers.

Of course, if we moved away from the work place assessment to a simulation in the class-room (ie inline with the model currently used in the ATA/AMA accreditation schemes for the sector), then this could be partly overcome, however, this still presents other issues which would need to be addressed such as learners away from the workplace for periods of time, and the costs incurred by learners (which would be a major issue for the very large number SME businesses in the sector).



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We should also be mindful, however, that potentially within these end point assessments we are looking to assess both knowledge-based qualifications and skills-based qualification, both of which could require different quality assurance processes by the awarding organisations. Again this would need to be discussed with awarding organisations during the development of the Apprenticeship qualifications.

Introducing the end point assessment will also take time to develop and implement, particularly where we are looking at the creation of new qualifications. Of course, there are going to be the elements of the National Occupational Standards and content of the current qualification that we can draw on, but to develop these qualifications (including accreditation, syllabus design and development, assessment development), to spread awareness and to ensure sufficient employer engagement takes time.

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

As per part of the IMI's response for Question 11, we believe that there are challenges attached to the grading of 'combined' qualifications (ie knowledge and skills-based). The grading might have to be conducted on a unit-by-unit basis and then an overarching grade allocated based on the compilation of the grades and a mean standardisation applied.

The competence or skills based elements are going to be particularly difficult to apply a grade to, and there has for a long time being the view that you are either competent or not competent, however, perhaps now is the time to investigate 'mastery' over competence, and look at a grading applied to this sort of methodology. The IMI do believe, however, that the criteria of measurement for competence versus mastery must be extremely clear to enable effective and consistent grading. This would also require much retraining of the assessment personnel, which could include employers, and so we have to take care so as not to make this too complex.

Whilst we would need to discuss with our partner Awarding Organisations in more detail, we believe that it could take some time to develop the systems required to underpin combined qualification grading, not to mention potential costs around IT system development.

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

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



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

**One of the main pieces of feedback that the IMI receives around the Functional Skills is that the assessment/delivery is not contextualised to the sector. Many employers and deliverers of the Functional Skills believe that this is a major barrier to learners, as they do not see the relevance of the Functional Skills to their Apprenticeship programme, or their sector. If the assessment were contextualised then we believe that we would see some major improvement in the achievement of the Functional Skills.**

**What we must not lose sight of is that many learners on vocational programmes may not adapt to 'academic' programmes and the 'exam assessment' that is applied. We believe that this also has an impact on some learners in achieving the Functional Skills elements of the Apprenticeships.**

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

**The main risks that the IMI foresees is on the achievement rates of learners. It will be very interesting to see whether this raising of the level of the Functional Skills has an impact on the success rates of the learners, and in addition, the increased teaching time for the learners to reach the Level 2 standard and achievement. There could also be risks, around the cost and length of delivery, which would have an impact on employers and providers, but this may lead to a more careful selection and recruitment process for Apprenticeships for those who have already achieved GCSEs/A Levels. This would, therefore, be good for learners who are very capable and keen, but who may not have achieved academic qualifications. What we must guard against is disadvantaging learners, and also the 'one-size fits all' approach to English and Maths.**

**The Traineeships are a potential solution to this, in that the delivery and upfront training on English and Maths will have already started for some learners. What we must ensure is that the assessment is vocationally driven rather than academically.**

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



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

**This really depends on the model that is proposed. As previously mentioned in this response, we believe that it is a challenge to demonstrate full competency in a final assessment, and if this is the way forward, we believe that there should also be a ‘learning journal’ that is endorsed by the employers in the lead-up to the final assessment. What we do have to find is new and innovative ways of delivering training and assessment, and further embrace new and emerging technologies to support delivery.**

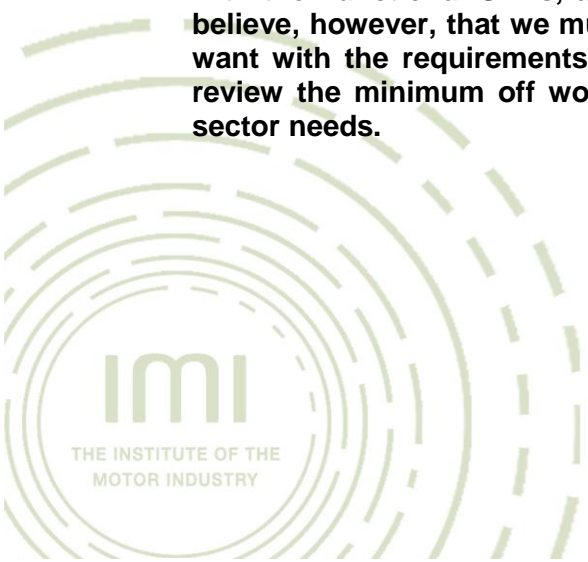
**Employers are key to this, and in defining the standards, they should also influence the delivery of the training, particularly where much of the assessment might align to in-house training. We also believe that it is also about utilising Managers and supervisors of the learners as mentors, and embracing the one-to-one support and guidance that an experienced manager and or supervisor can give.**

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

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

**Whilst there was resistance initially to embrace the off-workstation learning requirements from the SASE specification from employers and learning providers, the sector has now embraced this and recognises its importance to give the opportunity to train and reflect away from their day job.**

**Partly the resistance was down to the interpretation of the off-workstation learning, but once this was defined the sector started to feel comfortable with it – particularly with the Functional Skills, and knowledge component delivery. Moving forward, we believe, however, that we must apply flexibility to this to balance what the employers want with the requirements of the Apprenticeship, and therefore we might want to review the minimum off workstation hours requirement to ensure that it meets the sector needs.**



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

Yes

No

Don't know

Please explain your response:

**As we move forward we must be flexible in terms of meeting the needs of the employers, and their delivery structure. Whilst many would believe that off work station is an important aspect of the Apprenticeship, employers might adopt an on-the-job delivery for the majority of the programme and therefore a mandatory or minimum time requirement application might not suit all. Of course, this might not affect the outcome, or achievement of the Apprenticeship.**

18. Employers need to be able to trust in basic safeguards for the legitimacy, quality and capacity of training providers they may wish to deal with. The Skills Funding Agency checks the financial credentials, capacity and any Ofsted inspection record of training providers receiving public funding. We will build on these arrangements to ensure that, as far as possible, they are an effective assurance of training quality as well as financial health, and that this information is accessible to employers to support their choice of provider. In doing so, we must ensure a process that facilitates new providers entering the market. We are also developing a “chartered status” concept, to give employers a visible symbol for high quality and responsive training organisations.

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

**For the automotive retail accreditation schemes, ATA and AMA, the IMI adopts a Quality Assurance Standard for assessment centres to ensure that the centres are fit-for-purpose to deliver the accreditation of what has become the sector's defacto licence to practice. Through this “kite-marking”, or approval, of the centres it gives the IMI the opportunity to assess that the centres have the equipment and that the premises are fit-for-purpose to deliver the assessments. This works extremely well, and ensures that learners are not disadvantaged. If we were to move forward with the Apprenticeship qualifications being linked to the recognised accreditation schemes, we would want this to continue. We recognise that, however, awarding organisations have their centre approval systems and processes and we would also want to embrace these systems and processes moving forward.**

**What we want to ensure, however, is that employers recognise that any training providers that they engage with are sector recognised, whether this be through an ATA recognised partner or an awarding organisation's centre approval processes.**



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

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

Yes  ✓

No

Don't know

Please explain your response:

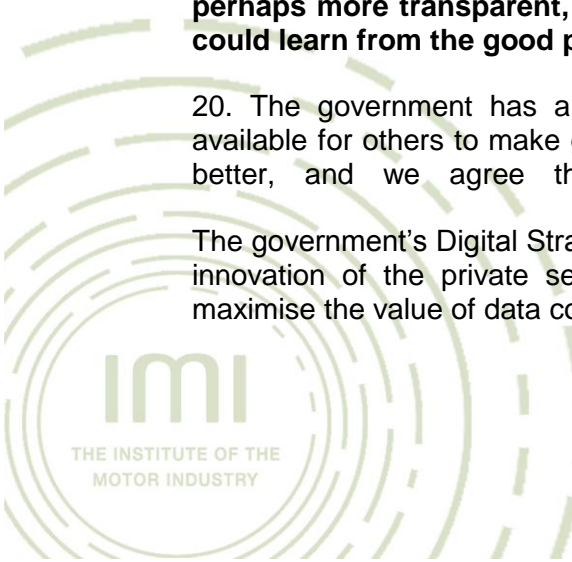
**In the automotive retail sector the ATA and AMA schemes are recognised by employers and employees working with the sector, and are seen as a valued tool for continual CPD as well as up skilling. This “kite marking” and alignment with the Apprenticeship qualification (where appropriate) could be seen as a valuable synergy by the sector. In addition, we also believe that the achievement of the Apprenticeship qualification, leading to access to membership of the sector’s professional association (The IMI) and The IMI’s Professional Register are also really valuable to learners and employers, and the sector as a whole in raising the profile.**

**In some sectors the National Skills Academy brand has been seen as an effective kitemarking of quality, and this has primarily been operated by Sector Skills Councils who act impartially to represent employers’ needs in skills. Historically, these have also relied on the previous ‘Training Quality Standard’ (TQS) which providers had to ensure that they had met all the criteria for. Whilst the system worked, some feedback received was around the TQS in that many said it did not sufficiently reflect the training delivered, but rather the systems and processes adopted by the learning provider.**

**This said, the principles of the sector-endorsed National Skills Academies driven by employers, and then measured against the standard based on the TQS formula (but, perhaps more transparent, clearer and training output focussed) has worked and we could learn from the good practice where this has worked.**

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

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



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

Previously, the IMI has had difficulty in getting specific data on Apprenticeship take-up and correlating this to completion. This is key to the sector in terms of articulating where Apprenticeship schemes are working and for highlighting where there is lack of take-up (eg for specific pathways) and for enabling the sector to look at reasons for this. Any work that could be done on providing this information would be gratefully received.

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

As articulated in the Richard Review, the IMI supports the view that there needs to be much work undertaken on promotion of the Apprenticeship programmes to young people and also their parents. We believe that this should be done in collaboration with the sectors, especially where we are promoting the range of occupations and the opportunities that exist.

The IMI has recently set up an online careers platform (Autocity), for example, that highlights the different roles and the entry requirements for them. In addition we have also developed and launched a vacancy service online to promote opportunities in the sector.

Stakeholders should work together to promote Apprenticeship opportunities within their sectors to the prospective learners and parents. Part of this comes down to raising the profiles and opportunities of the sector but it also requires that we dispel the myths that a vocational route is less valuable than the more traditional academic routes. There is much work still to be done here, but with the initiatives around equating the value of vocational and academic programmes (vocational qualifications for 16-19 review) and the consistent promotion of Apprenticeships, this can be achieved.

What has been fed back to the IMI is the inconsistent career guidance being given out by schools. We believe that there is much work to be done on communicating the different types of careers, and ensuring that effective and impartial advice is given to young learners and their parents about the opportunities in the different sectors.

For details on the IMI's Autocity careers website, please visit [www.autocity.org.uk](http://www.autocity.org.uk)

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



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

The IMI believes that by working with employers on Apprenticeship design and development to ensure that the programmes are fit-for-purpose, this would have the effect that employers would go out and promote the programmes to learners of all ages. We have to try and ensure that all key stakeholders work together; this is not about employers working on their own, it is about joined up thinking on the promotion of the sectors, the occupations, opportunities and the programmes. What we need is synergy between all of those working to promote Apprenticeships, not duplication.

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

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

No, the IMI does not have any concerns that the impact of these proposals would have either a positive or negative impact on any group.

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

Whilst the IMI would support many of the aims and objectives set out in the Richard Review and the proposals set out in this consultation, we also believe that much of this is already happening in existing Apprenticeships – certainly in our sector. For example, employer consultation, and employer input to the design, development and delivery of the Apprenticeship programmes. We are concerned that for some of these proposals we are making change where we could and should, instead, embrace the elements of the current Apprenticeship programmes that are working and, for the automotive retail sector, we are not receiving any comments saying that any of it is not working! We are also mindful of the amount of work that would need to be carried out to the Apprenticeships to meet some of the Richard Review recommendations, and this could have a detrimental effect on the Apprenticeship brand and could also take time to develop and implement these new programmes/qualifications. In addition, to review all Apprenticeship programmes would be an extremely costly exercise for all stakeholders.



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**We have been through an incredible period of change with the introduction of the SASE framework and requirements, and it is critical that we keep employers informed of any changes. We believe that impartial sector bodies are key to this, to ensure that employers needs are met and that there is collaborative working with awarding organisations who would offer the qualification products.**

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

