

University Alliance response to UCAS engagement exercise on allocating UCAS Tariff points to Apprenticeships at Level 3 and SCQF Level 6

To what extent do you support the proposed model? (Strongly support- Strongly oppose)

Strongly oppose

Why is this?

University Alliance has members that are some of the largest and fastest growing providers of higher and degree apprenticeships. We fully support the notion that the visibility of pathways from Level 3/SCQF Level 6 apprenticeships to higher education should be improved and that apprenticeships should be more widely understood to be excellent preparation for advancement through the workplace and education alike. We also appreciate the lengths UCAS has gone to develop and consider different models and discuss these iterations with stakeholders, including ourselves, prior to this public engagement exercise.

Unfortunately, the proposed model will not meet its stated aims of supporting higher education providers, apprentices and advisors, and in the answers to subsequent questions we go into more detail about why we think implementing it would be an unforced error.

The public engagement exercise document acknowledges that the Tariff is only a small part of the overall aim of supporting the understanding of a broader range of post-16 pathways, and indeed that the UCAS Tariff system is only one component of a wider admissions process. However, we can all agree that it is worth getting this element right and ensuring a fair and sustainable model is in place from the outset. We are concerned that once a model is introduced it will be a lengthy period before it can be meaningfully reviewed (having seen countless examples across a range of policy areas that demand long term focus, where the rising salience of an issue naturally diminishes once a 'solution' or building blocks are in place and the bottomless list of other priorities are demanding attention).

Applying a credit value to apprenticeships, as they do in Scotland, in all the UK nations would provide a much more accurate and fairer basis for assigning UCAS tariff points. This approach will take longer, but this engagement exercise would certainly not go to waste and UCAS' plans for enhanced guidance for HE admissions teams, apprentices and advisors could usefully go ahead in the meantime. The UK general election in and of itself provides a clear rationale to pause, rather than implement a far from ideal policy in short-order.

We are urging UCAS to put their momentum and weight behind a better and more sustainable solution.

Guidance proposed by regulators indicates that recommended duration (or credit for Scottish apprenticeships) is the best measure of size. To what extent do you support that this is the best measure of size for this purpose? (Strongly agree- Strongly disagree)

Strongly disagree

What do you propose instead?

The principle of measuring the amount and intensity of learning individuals undertake, not the time they spend doing it, should be upheld wherever possible and is not as embedded as we would like in the qualifications and lifelong learning landscape. This principle is obfuscated by using duration as a measure of size in this context. Recommended duration might be the best *available* measure of size, but it is a far from the best *potential* measure and is not an adequate basis for this policy. For example, the regulated data in England that has been used does not include any time spent preparing for or undertaking the end point assessment (EPA), which varies across apprenticeship standards but can be significant.

Applying a credit value (a means of quantifying and recognising learning whenever and wherever it is achieved) to all apprenticeships would provide a much more accurate and fairer basis for assigning UCAS tariff points and go some way towards negating the inherent disadvantages of using pass/fail grades in the UCAS Tariff. We should be striving to reach the same situation in Scotland - where there is a credit value as well as a credit level attached to apprenticeships - in England, Wales and Northern

Ireland too. This would require a concerted and joined-up effort across the three nations, but there are existing frameworks to build on and opportunities that could be exploited.

In England, for example, work that Health Education England commissioned Middlesex University to undertake (in partnership with the Open University, UVAC and Credit Works) on recognising prior learning in the healthcare sector included developing a credit value for the Level 3 Senior Healthcare Support Worker Apprenticeship standard. This could be used as a model for applying a credit value to existing apprenticeships retrospectively. The Lifelong Learning Entitlement will use a credit-based method for setting fee limits that will work across all higher-level courses and modules the LLE funds. IfATE are currently in the process of refreshing the way in which Trailblazers operate, providing a uniquely helpful moment to introduce an approach for Trailblazers to assign both a credit level (as they do currently) and a credit value to new apprenticeship standards.

We recognise it is not in UCAS' gift to bring about a system of applying a credit value to all apprenticeships in the UK, but by acknowledging that there is not currently a fair way to meet the demand to apply tariff points to apprenticeships, they could use their trusted position to provide a compelling case and momentum to policymakers.

We have not allocated grade bands above pass to ensure fairness across all nations of the UK, as apprentices in Wales, Scotland and Northern Ireland do not have an opportunity to achieve a merit or distinction grade as English apprentices do. Do you agree with this approach? (Strongly agree- Strongly disagree)

Strongly disagree

Why is this?

Fundamentally, putting pass/fail grades through the UCAS Tariff is a square peg in a round hole that will always to some extent limit the number of points that learners taking those qualifications can achieve compared to qualifications with more granular levels of performance built into their grading structure. The other imperfections in this model would extend and further hardwire that injustice, and risks undermining the perception of the value and rigour of apprenticeships and their preparation for higher education in the process.

We appreciate the complexities of designing a UK-wide approach and agree that ensuring fairness across all UK nations is vital. However, it is too simplistic to assume that removing a potential advantage for English apprentices' therefore levels the playing field across the nations. This model has disadvantages for all apprentices but would be particularly unfair to individuals in England and send confusing signals to current and prospective apprentices about the opportunities within the English apprenticeship system to differentiate between levels of performance and what this means for them.

The model would also actively set apprenticeships further apart within the qualifications landscape in England, Wales and Northern Ireland, which would likely make the wider policy context more challenging – a far cry from achieving the stated need “to position UK apprenticeships on an equal footing with A Levels, T Levels and other Level 3/SCQF Level 6 programmes of study”. When A Level and T Level students can obtain up to 168 tariff points, a model that caps an apprenticeship with a 24-month duration at 96 tariff points cannot reasonably be viewed as putting them on an equal footing.

The grading equivalences of the Certificate of Secondary Education (CSEs) and O-Levels serves as a cautionary tale. A CSE (mostly taken by schoolchildren in secondary modern schools) grade 1 was equivalent to achieving an O-Level grade of C or higher in the same subject, but an exact grade equivalence (i.e., A, B or C) was not specified, causing inequalities and great frustration to many pupils wishing to progress with their studies.

If the proposed model is implemented, there is a risk that HEIs will be disincentivized from accepting applicants with a Level 3/SCQF Level 6 apprenticeship on to smaller and more competitive HE programmes. To give just one example, University Alliance members deliver a significant amount of nursing and other allied health provision - collectively Alliance universities educate a third of all nursing students in England. Midwifery places are more limited than they should be in many regions due to challenges with placement capacity, which makes these programmes highly competitive and drives up the average tariff point level an HEI will consider for applicants. Many HEIs have

enthusiastically signed up to the new National Progression agreement recognising the Senior Healthcare Support Worker Apprenticeship for entry to Higher Education (a result of the work mentioned earlier that was undertaken by Middlesex University and others) as a means of widening access to their higher-level nursing, midwifery and other healthcare programmes.

However, if UCAS' proposed model is introduced and a 24-month Healthcare Support Worker apprenticeship in England can only attract 96 tariff points, HEIs could be penalised in the wider HE market environment for accepting these applicants over those from more traditional pathways that can obtain a higher number of points. The more selective by entry tariff an HEI decides to be, the higher they feature in national league tables. This is a wholly unsatisfactory and perverse incentive that we would like to see change, but nevertheless it is a current reality. At a time of unprecedented financial pressures on HEIs, with the need and competition to fill places greater than ever, these incentives are hard to ignore. If the targets in the NHS Long Term Workforce Plan are met, 1 in 6 first-year higher education students will be training to be NHS clinical professionals by 2031/32. Given the speed at which universities and the NHS will need to expand capacity to meet the Plan's commitments, UCAS must avoid unintentionally creating such an unhelpful policy disconnect.

The engagement exercise document mentions that in cases where an embedded qualification attracts higher points than the apprenticeship, applicants will be able to select the higher of the two to use in their application. We agree that it would be 'double counting' to include both, but has UCAS conducted an analysis of previous cohorts to estimate the extent to which embedded qualifications in Scotland, Wales and Northern Ireland will be likely attract higher points, in order to assess whether these apprentices would be given an advantage over those in England that don't have this option?

To what extent do you agree that the proposed model meets our guiding principles? (Strongly agree- Strongly disagree)

Strongly disagree

Why is this?

As we have outlined in our answers to the previous questions, this model does not meet the first three guiding principles. Duration is not a comparable measure of size for apprenticeship provision (principle 1); capping the allocation of tariff points at a pass grade does not provide a comparable measure of standard (principle 2); and apprentices will be disadvantaged on an intra-UK basis in terms of recognising levels of performance and when compared to students undertaking other qualifications at this level (principle 3).

Is there anything that we have not considered in this paper that you would like to share thoughts on?

We hope UCAS will decide not to move ahead with the proposed model and instead support the approach outlined in this response. However, if UCAS were to implement the proposed model, we are concerned that September 2024 does not provide nearly enough time for producing and disseminating the supporting IAG and communications campaign that will be necessary to socialise the changes, which would ideally be co-designed with the relevant stakeholders. Implementation should be delayed until 2025 to allow sufficient time for all stakeholders to prepare.