

Can you credit it? Towards a process for ascribing credit to apprenticeships in England

Abstract

Purpose – Apprenticeships in England, while defined by level and typical duration, are not quantified regarding the number of learning hours required to achieve the outcomes specified, as with other regulated qualifications and accredited programmes. This paper proposes an approach to ascribe credit to apprenticeships recognising both on-and-off-the-job learning to remove some of the existing barriers to accessing higher education (HE) and the professions.

Design/methodology/approach – A mixed methodological approach resulting in a total learning hours/credit value proposed.

Findings – There is significant HE-wide confusion regarding the amount of learning/training that is required to complete apprenticeships in England. Whilst sector guidance made it clear that there was no prescribed method to ascribe credit to qualifications, programmes, modules, units or apprenticeships by drawing out the core principles within current practice, a key outcome of this project was the development of a method to ascribe a credit value to apprenticeships.

Research limitations/implications – There is potential to support further research into the recognition of prior learning as a specialised pedagogy and for reflecting on apprenticeship practice in other roles and sectors.

Practical implications – Whilst the project underpinning this paper focused on the healthcare sector, the method used to ascribe credit to the level 3 healthcare support worker apprenticeship was not sector specific and can therefore be applied to apprenticeships within other contexts providing more widespread benefits to workforce development.

Originality/value – It is a first attempt to ascribe a credit value to an apprenticeship in England for the specific purpose of facilitating progression to HE.

Keywords – academic credit, access, apprenticeships, career progression, healthcare, inclusion, recognition of prior learning

Paper type – Research paper

Introduction

There remains a missing component that is undermining the consistent recognition of apprenticeships, that manifests as a barrier to career progression for individuals and inhibits meeting workforce needs, which this paper seeks to address. While all apprenticeship standards in England have an ascribed level, they do not require a number of credits to be ascribed. This means that while, on the one hand, all apprenticeships in England can be afforded consistent recognition regarding complexity, challenge and autonomy, there is no consistent measure of the amount of learning/training required to achieve occupational/professional

competence. There are established expectations that specific qualifications normally amount to a specific amount of credit at identified levels but there is no equivalent established expectation regarding the credit value, or number of credits, for the apprenticeship itself (Bravenboer, 2022).

This matters because it inhibits flexible career progression and because it results in national, regional and employment sector skills gaps. For example, Britain's National Health Service (NHS) *Long Term Plan* (2019) states that:

14,000 applicants to nursing were not accepted onto courses. At a time of staff shortage across the NHS...many thousands of highly motivated and well-qualified applicants...are being turned away. (NHS, 2019, p. 80)

While it is not the case that all applications identified were refused because their apprenticeship achievements were not appropriately or consistently recognised, this paper argues that ascribing credit to apprenticeships will support more consistent recognition and help to remove at least one of the barriers to progression.

The regulatory environment within which apprenticeships in England operate provide significant challenges to developing a consistent process for ascribing credit value. These challenges are concerned with the variety of ways in which the number of required learning/training hours are described. For the purposes of this paper, terms such as 'learning hours', 'notional learning hours', 'training hours' are deemed to be synonymous as, in one way or another, they are all concerned with a measure of the time taken to engage with a learning/training activity of some kind. Similarly, no distinction will be made between 'learning' and 'training' as, in the context of apprenticeships, both are intended to bring about the development of identified outcomes in the form of KSBs required for occupational/professional competence.

The research that underpins this paper was conducted in the context of a project funded by Health Education England (HEE), entitled 'Recognising Talent for Care: Pathways for Progression to Higher Education'. The project focussed on establishing parity of recognition for individuals seeking access to HE and progression to registered professions within the healthcare sector through non-traditional routes. In particular, the project focussed on addressing the lack of recognition of the level 3, senior healthcare support worker apprenticeship. The national *Talent for Care* (HEE, 2014) strategic framework, which identified the need to better career progression for the support workforce, identified that:

The challenge is inconsistency...even those who have good access to training and education may find their qualifications or past training does not transfer from one organisation to another or enable progression into higher education (HEE, 2014, p. 11).

A key way in which the project sought to address inconsistent recognition was to establish a common understanding of the value of the senior healthcare support worker apprenticeship as preparation for HE through the process of ascribing credit. This particular apprenticeship prepares people to work in a range of healthcare settings by working side by side with registered healthcare professionals on a daily basis. Learners completing this apprenticeship gain unique insight into what is required to become a healthcare professional, which arguably provides far better preparation for healthcare degree programmes than more

traditional entry qualifications. This is hugely significant but not sufficiently recognised through traditional admissions processes. The project sought to address this issue and the barriers to progression it presents. The specific research aim for this aspect of the project was to develop a method for ascribing credit to the senior healthcare support worker apprenticeship that could also be applied to any apprenticeship standard in England.

Literature review

Ascribing academic credit

The process for ascribing of credit in the UK is almost universally based on the achievement of specified learning outcomes (HE Credit Forum, 2012; Pollard *et al*, 2017). Similarly, the use of credit to indicate the amount of learning undertaken as well as the depth of learning has become the norm (with few exceptions) in the UK.

Now in the UK, notional hours of learning are used to estimate the amount of learning and thus time it will take a typical student to achieve the learning outcomes; and 1 credit equates to approximately 10 notional hours. The 10-hour credit has progressively become the national standard (Pollard *et al*, 2017).

The use of academic credit provides a common currency for learning and a mechanism for quantifying achievement irrespective of where it was completed “bridging the gap between formal, non-formal and informal learning opportunities” (Dunn and Marr, 2022, p. 12). Academic credit is also a form of “market currency” (Marr and Bravenboer, 2017, p. 1), which whether used for entry to HE or employment “should be, an absolute measure of equivalence of learning” (Dunn and Marr, 2022, p. 22) yet within the U.K. there is no prescribed method of ascribing credit to a qualification other than the notion that one credit typically equates to 10 notional hours of learning. By acknowledging that credit should facilitate parity in the recognition of learning achievements, but how it is applied “will differ according to types of delivery, subject content and student cohorts” (QAA, 2021, p. 11) also means to recognise its absence can create barriers for people seeking to progress their careers.

When admitting students to a course of study, providers want to be assured that learners are adequately prepared for higher level learning, which is normally viewed through the value of the prior qualification in terms of the level and volume of learning undertaken. Establishing the value of an apprenticeship in preparing learners is relatively straight forward. Mapping the knowledge, skills and behaviours (KSBs) of an apprenticeship standard to the SEEC Credit Level Descriptors for HE (SEEC, 2021) provides a clear articulation of the learning value of apprenticeships as a work-based programme, to support appropriate progression to HE. SEEC credit level descriptors are designed to enable learning that is described in the same way to gain equivalent recognition (QAA, 2012), and are a HE sector recognised tool to benchmark learning in apprenticeships. Using the SEEC credit level descriptors is recognised as an important means to achieve consistency in approach to articulating the learning expectation of apprenticeships and to understanding their value (SEEC, 2021; QAA, 2021; Bravenboer, 2022).

Ascribing a credit value (or number of credits) to an apprenticeship is far more complex and made more challenging because there is no prescribed method of ascribing credit. Guidance presented within HE does not relate directly to apprenticeships and is instead based on the ascription of credit to qualifications,

programmes and modules/units of study. This typically focuses on how credit is ascribed to modules/units of study where the total credit value of the qualification is known. The whole qualification is then divided up into smaller elements (modules/units) in equal and/or various sizes, which are combined to comprise the whole qualification or learning programme. The challenge with apprenticeships however is that the overall size of the qualification/programme is unknown making the ascription of credit more complex. Whilst published guidance does not provide a method to achieve this, it does present key principles which can be used to develop a process of ascribing credit to apprenticeships. For example, in the development of access to HE diplomas (QAA,2020), it is made clear that the ascription of a credit value to each unit within the 60-credit qualification:

“...is a matter of professional judgement for Access Validating Agencies (AVAs), exercised within their validation process. These judgements are based on the concept of a ‘notional learning hour’, where one credit represents those learning achievements that can be demonstrated in 10 notional learning hours” (QAA, 2020, p. 12).

The *Higher Education Credit Framework for England* (QAA, 2021) makes it clear that:

“credit assigned to modules or courses is based on the approximate number of hours a learner is expected to spend learning to achieve the learning outcomes for that module, including guided and independent study” (QAA, 2021, p11).

When we relate this to apprenticeships, this would be the time required to develop the KSBs. Whilst the value of credit in relation to the number of learning hours is consistent within the Credit Framework for England, the Qualification and Curriculum Authority (QCA) make it clear that “the process to determine credit value cannot be prescribed” (2008, p. 30). The ascription of a credit value to a unit of learning is considered by QCA to be part of “the holistic process of unit development”, the guiding principles of which will be “similar to those relating to determining level” (QCA, 2008, p. 30).

Core to ascribing a credit value is the notion of learning time, but this:

“is not an exact, scientific measure but a judgement made and agreed by those who are informed and experienced in the relevant area of achievement and who understand the contexts in which the learning can take place” (QCA, 2008, p. 28).

That said, when seeking to arrive at a credit value through an estimation of learning time, “the credit value of a unit is arrived at by estimating the learning time and dividing it by 10” (QCA, 2008, p. 31) as this reflects the one credit per 10 hours of notional learning metric. A key aspect of the process of ascribing a credit value to a unit of learning is, as identified by QCA, “the involvement of a panel or group of relevant experts” to ensure that the “credit value is recognised and accepted by relevant stakeholders” (QCA, 2008, p. 30). This will mean that credit values will have been arrived at “through discussion between professionals as part of the overall unit development and validation process, drawing on expertise in subject areas” (QCA, 2008, p. 30).

In a similar vein, guidance from the *Scottish Credit and Qualifications Framework* (SCQF) (2017) indicates that the allocation of credit points to qualifications is established by individuals who have expertise within the

subject and make a professional judgement on the number of hours a typical learner would take to achieve the learning outcomes at a given level. In alignment with both the *HE Credit Framework for England* (QAA, 2021) and QCA (2008), the time estimated is referred to as learning hours and one SCQF credit equates to 10 notional hours of learning (SCQF, 2017). The SCQF makes clear that consideration of time spent on all activities that lead to the achievement of learning outcomes must take place when ascribing credit to a learning programme or qualification. This is important when, in trying to establish a consistent method to ascribe a credit value to apprenticeships, reference to relevant accredited qualifications can provide valuable benchmarks. For integrated higher and degree apprenticeships (where end point assessment of occupational competence is co-terminous with the qualification) this is very straightforward as they necessarily include mandatory HE qualifications although there are instances where the correlation between the learning hours for the degree and those required for the apprenticeship do not correlate such as for registered nurse. However, benchmarking for non-integrated apprenticeships that include a mandatory qualification is far more complex. For this particular type of apprenticeship, the learning hours associated with the mandatory qualification may only partially contribute to the total learning hours required. Also, for those that do not include a mandatory qualification, direct benchmarking against other relevant qualifications may not be available.

Benchmarking for non-integrated apprenticeships can, however, still take place, although indirectly. This can involve consideration of precedents currently available in HE that potentially align with the total amount of apprenticeship learning hours or credit value being proposed. For example, the Universities and Colleges Admissions Service (UCAS) in England states that level 3 apprenticeships are “generally considered to be equivalent to two A level passes” (UCAS, 2023). If an equivalent credit value for two A level qualifications could be ascertained or calculated, then, in principle, this could provide a helpful benchmark for non-integrated level 3 apprenticeships.

Drawing together the key principles presented within relevant guidance, the process for ascribing credit to modules/units within a qualification can be articulated within five key steps: development of learning outcomes; development of assessment criteria; estimation of learning hours through discussion by experts within the relevant field; benchmarking against precedents within HE; and agreement and validation of credit value. This process cannot, however, be applied directly to apprenticeships without consideration of their specific regulatory requirements, including normal working hours, on – and off-the-job learning/training hours, and mandatory qualification learning hours. By drawing on the key regulatory requirements for apprenticeships and applying them to the general process for ascribing a credit value to qualifications, it is possible to develop an apprenticeship specific process. The objective of the process will be to determine the total number of learning/training hours it will take for a learner to achieve the KSBs specified in the apprenticeship standard that are required to become occupationally competent. Additional steps will be required to appropriately reflect the relationships (expressed in hours) between different elements of the regulatory requirements of apprenticeship standards.

Determining on- and off-the-job learning/training hours

Any process for ascribing credit to any learning programme, module or unit, including apprenticeships, requires two key factors. Firstly, establishing the level at which learning is intended to take place as “an indicator of the relative complexity, demand and/or depth of learning” (QAA, 2021). Secondly, the credit value is needed as a measure of:

The number of credits, at a particular level, assigned to a body of learning.

The number of credits is based on the estimated learning hours (where one credit typically represents 10 notional hours of learning) (QAA, 2021, p. 1).

This means that to ascribe the number of credits for an apprenticeship, there is a need to establish how many learning/training hours are required for an apprentice to achieve the KSBs specified in the relevant apprenticeship standard. Whereas most accredited qualifications, in the UK and internationally, do specify the learning hours required to complete an associated programme of study, as indicated above, apprenticeship standards in England do not. Similarly, while all apprenticeship standards specify a level (equating to academic credit levels) and typical duration (expressed in months), the number of learning/training hours required to complete an apprenticeship is not.

In England, all apprenticeships require a combination of on- and off-the-job learning/training to enable apprentices to develop the required KSBs. For example, in the formal response to their consultation on degree apprenticeships, IfATE stated that:

Apprenticeships work best when learning and experience in the workplace and off-the-job training delivered by the training provider are fully integrated and mutually reinforcing (IfATE, 2022).

Furthermore, that the integration of on- and off-the-job learning/training is “intended to ensure that on-the-job and off-the-job training are delivered in a co-ordinated and mutually reinforcing way” (IfATE, 2022). Additionally, the Department for Education’s (DfE) Apprenticeship Funding Rules (2023) specify that to be eligible, apprentices must have formal off-the-job training (which is a statutory requirement and the responsibility of the learning provider) and:

The opportunity to apply these new skills in a real work environment, in a productive job role, (which is the responsibility of the apprentice’s employer) (DfE, 2023, p. 28).

This would suggest that on-the-job learning/training can contribute to the development (through application) of ‘new skills’ (the KSBs). However, rather confusingly, DfE’s funding rules distinguish between off-the-job and on-the-job learning/training hours by stating that whereas off-the-job training:

...is training which is received by the apprentice within their practical period, during the apprentice’s normal working hours, for the purpose of achieving the knowledge, skills and behaviours of the apprenticeship they are undertaking.

It is not on-the-job training, which is training received by the apprentice for the sole purpose of enabling the apprentice to perform the work for which they have been employed. By this we mean training that does not specifically link to the knowledge, skills and behaviours set out in the apprenticeship (DfE, 2023, p. 38).

This could be read to suggest that off-the-job learning/training must contribute to the development of KSBs but on-the-job learning/training may contribute to the development of KSBs *or* may not, where it is for the “sole purpose of enabling the apprentice to perform the work for which they have been employed”. Given that all apprentices are employed for the purposes of undertaking ‘a job with training’ (DfE, 2023, p. 28), the

separation between 'work' and 'learning/training' seems unhelpful. This may be because the funding rules are driven by and focussed on establishing what is eligible to fund through the UK Apprenticeship Levy rather than quantifying amounts of required learning. However, it presents a particular challenge when seeking to establish the total learning/training hours required to complete an apprenticeship, which is required to establish a credit value.

As indicated above, all learning/training hours required to complete the apprenticeship must be undertaken within 'normal working hours'. This provides an upper ceiling for the total amount of learning hours required to complete an apprenticeship. However, it does not indicate how many normal working hours should be dedicated to learning/training on-the-job or off-the-job.

The statutory requirement for a minimum amount of off-the-job learning/training hours that are to be undertaken within normal working hours, is specified in the DfE apprenticeship funding rules and a method for calculating the minimum off-the-job training hours is provided. However, this does not equate to the amount of learning/training hours that may be required to develop the KSBs to achieve competence, nor is it specified what the amount of on-the-job training/learning hours may be required.

So, while there is an upper limit to the amount of learning/training hours, provided by the amount of normal working hours and a statutory minimum amount of off-the-job learning/training hours, this does not establish the total amount of apprenticeship learning hours required to determine credit value. As a consequence of the way that on-the-job training has been defined negatively as *not* off-the-job training "that does not specifically link to the knowledge, skills and behaviours set out in the apprenticeship" (DfE, 2023, p. 38), there is a need to clarify the role of on-the-job training that does contribute to the development of the KSBs. The risk of not doing so makes it more likely that policy makers and practitioners will mistakenly conflate the statutory minimum off-the-job training entitlement with the total number of learning/training hours required to develop the KSBs set out in an apprenticeship standard. Such an interpretation would lead to a gross underestimation of the amount of learning/training hours required to develop occupational competence.

Implications for different kinds of apprenticeships

Most apprenticeships are 'non-integrated' meaning that the impartial end-point assessment of whether an apprentice has developed all the KSBs is conducted by an organisation separate from the apprenticeship training provider. There are two types of non-integrated apprenticeships; those that include a mandatory qualification and those that do not. However, many apprenticeships and the majority of apprenticeships in the healthcare sector for example, do include the requirement to complete a mandatory qualification. For these apprenticeships, mandatory qualifications must be successfully completed for apprentices to undertake the end-point assessment that establishes full occupational/professional competence.

Typically, the mandatory qualifications specified within apprenticeship standards have a credit value and associated notional learning hours. The diploma in healthcare support, required for the senior healthcare support worker apprenticeship, has a value of 83 credits at level 3 and 830 learning hours. For non-integrated apprenticeships such as this, the mandatory qualification learning hours do not include any hours associated with undertaking end-point assessment.

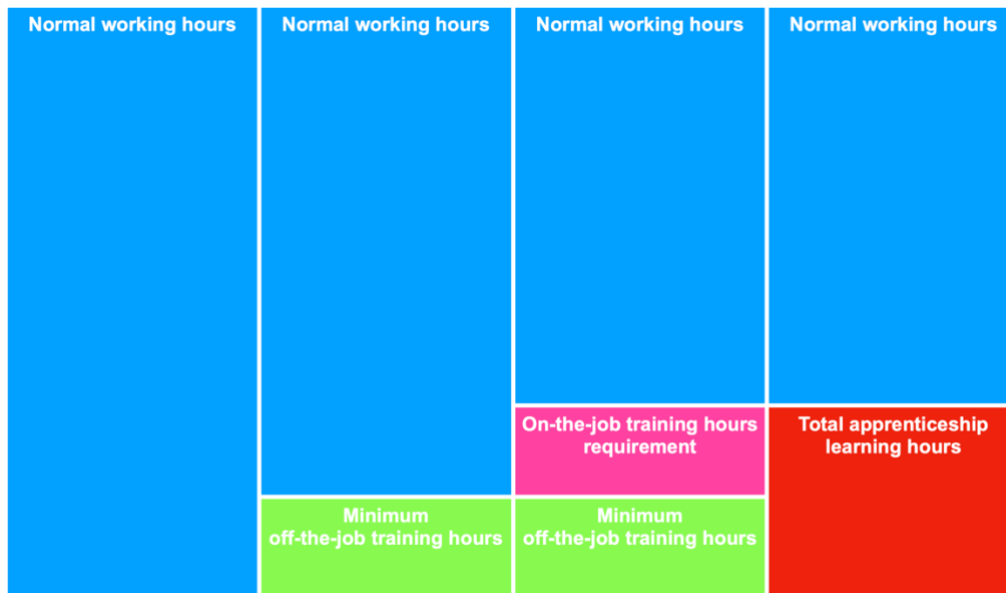
For some professions, such as nursing, HE providers and degree qualifications that have been accredited by the relevant statutory and regulated body, for example the Nursing and Midwifery Council (NMC) in the UK,

now constitute integrated higher and degree apprenticeships. For this kind of apprenticeship, completion of the accredited mandatory qualification itself is deemed to meet the requirement for end-point assessment of occupational/professional competence. This means that the learning hours required to complete the accredited mandatory qualification also normally constitute the learning hours required to complete the apprenticeship. For example, the nursing associate foundation degree has a value of 240 credits at levels 4 and 5 and requires 2,400 learning hours, which also constitutes the total learning hours for the nursing associate apprenticeship.

However, the registered nurse integrated degree apprenticeship, like all other pre-registration nursing degree programmes in the UK, currently requires a minimum of 4,600 hours to be accredited by the NMC, which has a statutory responsibility to oversee the standards of nursing education. The NMC also requires that a minimum of 2,300 of these hours must be 'practice hours', which equates to on-the-job hours, undertaken in a workplace setting. This means that while the mandatory qualification within a standard integrated degree apprenticeship would require 3,600 learning hours, the registered nurse degree apprenticeship requires an additional 1,000 hours. Given that it is also required that 2,300 of these hours are 'practice' hours, it can be assumed that at least 1,000 of 'practice' (on-the-job) hours are in addition to the mandatory degree qualification learning hours.

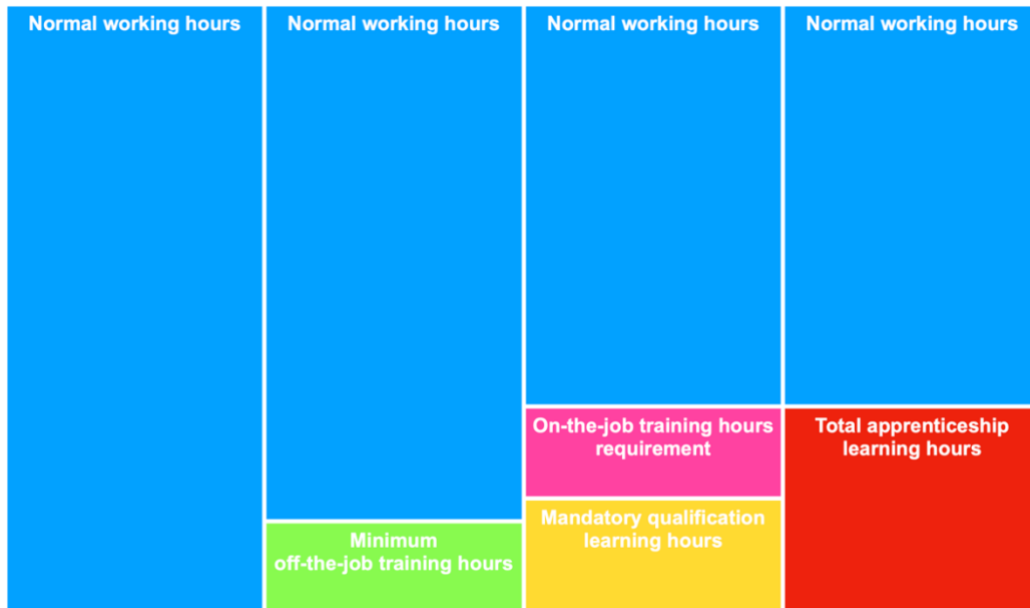
Integrated degree apprenticeships that are not statutory or regulated professions have been designed with the end-point assessment embedded within degree programme modules and are required for the award of the degree and the apprenticeship certificate. The following examples illustrate the various relationships between normal working hours, the statutory minimum off-the-job learning/training entitlement, mandatory qualification learning hours, on-the-job learning/training hours and apprenticeship learning hours for different kinds of apprenticeships.

Figure 1: Non-integrated apprenticeships without mandatory qualifications



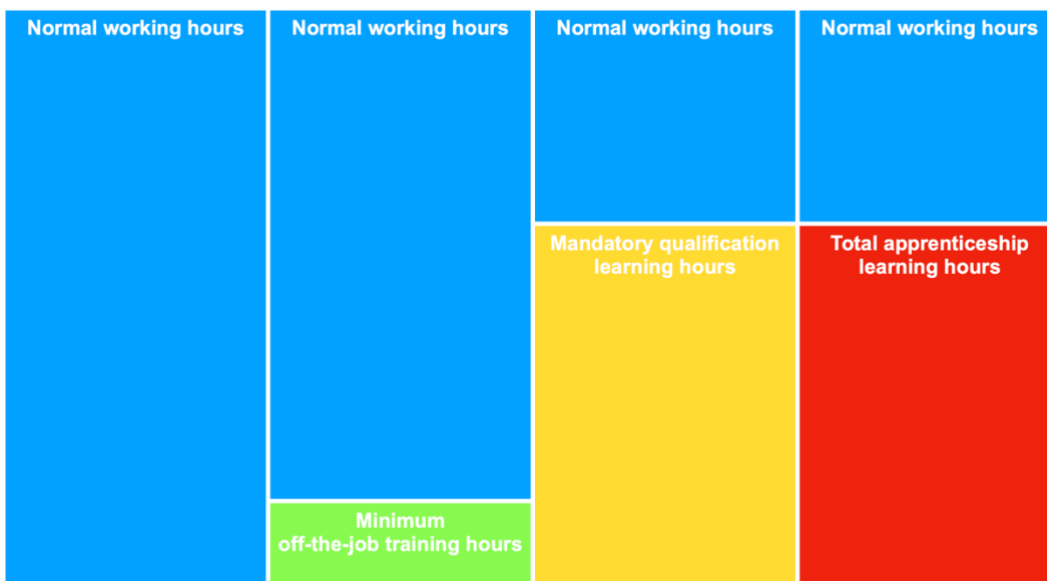
For non-integrated apprenticeships that do not have mandatory qualifications, consideration will need to be given to the amount of on-the-job learning/training hours that are required to develop the KSBs specified over and above the statutory minimum entitlement. Once established, this can be added to the minimum off-the-job learning/training entitlement to ascertain the total apprenticeship learning hours. A key risk for these kinds of apprenticeships is that the assumption is made that all the learning/training time needed can be undertaken within the off-the-job hours. 'Statutory minimum learning/training hours' and 'total required learning/training hours' are not the same thing.

Figure 2: Non-integrated apprenticeships with mandatory qualifications



For non-integrated apprenticeships with mandatory qualifications, consideration will need to be given to the relationship between the minimum off-the-job learning/training hours and the mandatory qualification learning hours. In some cases, the mandatory qualification learning hours exceed the minimum off-the-job learning/training hours, which means that some of the hours must be able to be undertaken on-the-job. There may be further on-the-job learning/training hours that are required to develop the KSBs. The combination of mandatory qualification learning hours and required on-the-job learning/training hours will indicate the total apprenticeship learning hours. This provides further evidence that ‘statutory minimum’ and ‘total required learning/training hours’ cannot be conflated as the latter is significantly larger than the former.

Figure 3: Integrated higher and degree apprenticeships – type 1



For integrated higher and degree apprenticeships, the mandatory qualification will be a HE qualification or degree that will have a high level of learning hours in relation to normal working hours. For example, 3,600

learning hours for an integrated degree apprenticeship. This requirement will significantly exceed the minimum off-the-job learning/training entitlement and will necessitate that apprentices undertake a significant number of hours engaged in on-the-job learning/training. This means that the mandatory qualification learning hours must incorporate both on- and off-the-job learning/training hours. This also means that the mandatory qualification learning hours normally equate to the total apprenticeship learning hours. However, for some integrated degree apprenticeships, professional registration may require more learning/training hours than are specified by the degree. In such cases, combination of the mandatory qualification learning hours and the additional on-the-job learning/training hours will comprise total apprenticeship learning hours.

Figure 4: Integrated higher and degree apprenticeships – type 2



This example indicates two things. Firstly, that the specified mandatory qualification learning hours do not always encompass all the required learning/training time to successfully complete an integrated-type apprenticeship. Secondly, that the statutory minimum learning/training hours bears no resemblance to the amount of learning/training hours required to successfully complete the apprenticeship.

Methodology

The mixed methodological approach taken involved two key stages. The first stage involved the mapping of the level 3 Senior Healthcare Support Worker apprenticeship standard to the level 3 SEEC credit level descriptors to confirm the breadth of learning undertaken. Having confirmed the value of this apprenticeship in terms of academic level, the second stage involved the ascription of a credit value to the apprenticeship.

The second stage required establishing and calculating the number of hours associated with the duration of the apprenticeship including: normal working hours; minimum statutory off-the-job hours; mandatory qualification learning hours; on-the job hours. The approach taken for establishing the number of on-the-job hours reflected a consistent feature of published guidance that ascribing credit value required 'professional judgement' (QAA, 2020) made by people who are appropriately, informed, experienced and expert in the relevant field (QCA, 2008, SCQF, 2017). The approach adopted included the formation and operation of an

'expert panel' of employers drawn from the apprenticeship 'trailblazer group' to make professional judgements regarding the on-the-job hours requirements for the apprenticeship.

Evaluation of the KSBs against the SEEC credit level descriptors

Although the senior healthcare support worker apprenticeship is already approved at level 3, further analysis was undertaken to demonstrate how the required areas of KSBs (the learning outcomes) were aligned with the expectation for learning within the *SEEC descriptors* (2021). The SEEC descriptors, which are highlighted within the *QAA Higher Education Credit Framework for England* (2021), describe learning expectations in a coherent and consistent form (from level 3 to level 8) that is used by providers in the development of HE programmes. At the same time, the SEEC descriptors are also specifically designed to reflect the KSB requirements of apprenticeship programme development. Therefore, the SEEC descriptors provide a consistent means to establish the kind of learning required by the senior healthcare support worker apprenticeship in a language that is familiar and recognised by HE providers.

Evaluation of the KSBs against the SEEC credit level descriptors involved three key steps:

Step 1: The senior healthcare support worker apprenticeship standard was mapped against the level 3 SEEC credit level descriptors. The apprenticeship standard was revised at the time of this project and therefore for completeness, the mapping activity was conducted for both the existing and new apprenticeship standards.

Step 2: A thorough gap analysis was undertaken to identify the degree to which both standards mapped to the level 3 SEEC credit level descriptors and if any gaps in alignment existed.

Step 3: The assessment plan for the senior healthcare support worker apprenticeship was mapped against the level 3 SEEC credit descriptors to identify alignment.

Evaluation of the apprenticeship KSBs with the level 3 SEEC credit level descriptors indicated that that the senior healthcare support worker apprenticeship strongly aligned with the expectations for level 3 study and in particular with areas that provide significant preparation for higher level learning. These include, problem solving, research and enquiry; project design and development skills; ethical awareness and application; personal responsibility and leadership.

Having confirmed the value of this apprenticeship regarding academic level and as an excellent preparation for higher level learner, the task remained to establish the credit value/number of credits that should be ascribed to the apprenticeship.

Ascribing a credit value to the total apprenticeship learning/training hours

Despite drawing together the key principles presented within relevant guidance identified in the literature review, the ascription of credit cannot be applied directly to apprenticeships without consideration of their specific regulatory requirements, including normal working hours, on- and off-the-job learning/training hours, and mandatory qualification learning hours. However, by drawing on the key regulatory requirements for apprenticeships and applying them to the general process for ascribing a credit value to qualifications, a

process to determine the total number of learning/training hours it will take for a learner to achieve all the learning outcomes specified in the apprenticeship standard to become occupational was developed.

Step 1: Calculate the total normal working hours in relation to the duration of the apprenticeship standard by determining the normal weekly working hours and multiply by the number of weeks over the duration of the apprenticeship, less statutory leave entitlement. This provides the total normal working hours 'envelope' within which all apprenticeship training must take place.

Step 2: Calculate the total minimum statutory off-the-job learning/training hours in relation to the duration of the apprenticeship standard in accordance with DfE Apprenticeship Funding Rules (2023) guidance by calculating the number of weeks over the duration of the apprenticeship, less statutory leave entitlement multiplied by 6 hours per week. This provides the statutory minimum off-the-job hours entitlement. It does not provide any information directly regarding how many learning/training hours are required for apprentices to develop the required KSBs.

Step 3: Subtract the minimum statutory off-the-job learning/training hours from the total employed hours to identify the total number of normal working hours within which on-the-job learning/training can, in principle, take place. Establishing this is particularly relevant for non-integrated apprenticeships without a mandatory qualification as it provides the parameters within which any required training beyond the statutory minimum entitlement must take place.

Step 4: Identify the total learning hours specified by the mandatory qualification, as applicable.

Step 5: Where applicable, subtract the total mandatory qualification hours from the normal working hours to identify how many normal working hours are available for non-qualification or additional required on-the-job training/learning to take place.

Step 6: Estimate the total amount of hours that it would take to complete the on-the-job non-qualification or additional required learning/training activities to support the development of the KSBs over the duration of the apprenticeship. To be clear, the estimated on-the-job learning/training hours identified are in addition to and not contained within the total learning hours specified by a mandatory qualification. This is important as some mandatory qualifications are designed to be 'work-based'. If required, additional on-the-job learning/training hours as specified by a professional body will require the identification of the range of learning/training activities that will take place to support the development of the KSBs that can only be developed on-the-job.

This is a key step, particularly for non-integrated apprenticeships with or without a mandatory qualification. Categorising types of on-the-job learning/training will, to an extent, be sector specific and it is advised that the process includes the formation of an expert employer panel to both sense check proposed on-the-job learning/training categories and to provide information regarding typical patterns of engagement with agreed on-the-job learning/training activities.

In the case of the senior healthcare support worker apprenticeship, this included those employers who developed the apprenticeship standard and those who had experience of supporting senior healthcare support worker apprentices in work. With the support of Health Education England (now NHS England) a

panel of six employers was established to inform judgements regarding both the types of on-the-job learning training that would typically take place for this apprenticeship as well as the amount of hours that would typically be dedicated to each activity.

The expert panel process included the following key steps:

1. Inducting expert panel members regarding the purpose of the role
2. Review and confirmation of relevant forms of on-the-job learning/training
3. Production and distribution of the on-the-job learning/training activity template to gather specific evidence from relevant workplace settings
4. Estimation of the number of on-the-job learning/training hours
5. Evaluation of information provided
6. Estimation of typical on-the-job learning/training hours based on the evaluation of the completed on-the-job learning/training templates
7. Sense-checking of the proposed estimated number of on-the-job learning hours
8. Confirmation of the estimated on-the-job learning hours for the apprenticeship.
9. Sense checking of total apprenticeship learning/training hours and credit value (number
10. Confirmation of credit value

Appendix 2 provides an illustration of the approach used to gather information from the expert employer panel.

Step 7: Calculate the total learning hours for the apprenticeship. For non-integrated apprenticeships with no mandatory qualification, the calculation requires adding the statutory minimum off-the-job training entitlement hours to the total estimated on-the-job learning/training hours. For non-integrated apprenticeships with a mandatory qualification the calculation requires adding the total mandatory qualification hours to the estimated (additional) on-the-job learning/training hours. For all non-integrated apprenticeships, it is advised that the proposed total number of apprenticeship learning hours is 'sense checked' with the expert employer panel prior to confirmation. For integrated higher and degree apprenticeships, the total apprenticeship learning hours will normally be the same as the total learning hours for the mandatory qualification, as is the case for the Police Constable Degree Apprenticeship (PCDA). The proposed total apprenticeship learning hours can, at this point, be benchmarked against relevant precedents, including existing relevant qualifications.

Step 8: Once the proposed total apprenticeship learning hours are confirmed, divide by 10 to establish the credit value for the apprenticeship standard, based on the 10 learning hours per credit metric. The process below could also apply to any apprenticeship, at any level, in England.

Figure 5: Illustration of steps and calculations for the credit value of an apprenticeship using the senior healthcare support worker (SHCSW), and police constable (PCDA) and registered nurse (RNDA) degree apprenticeship examples

Steps	Calculations	SHCSW	PCDA	RNDA
1	Total normal working hours	3480	5220	6960
2	Total minimum statutory off-the-job training hours	556	834	1112
3	Total normal working hours – (minus) Total minimum statutory off-the-job training hours	2924	4386	5848
4	Total mandatory qualification learning hours (if applicable)	830	3600	3600
5	Total normal working hours – (minus) Mandatory qualification learning hours	2650	1620	3360
6	Total estimated or required additional on-the-job training hours	400	0	1000
	Non-integrated apprenticeships with no mandatory qualification			
	Total minimum statutory off-the-job training hours + (plus) Total estimated on-the- job training hours	-	-	-
	Non-integrated apprenticeships with a mandatory qualification			
7	Total mandatory qualification learning hours + (plus) Total estimated on-the-job training hours	1230	-	-
	Integrated higher and degree apprenticeships			
	Total mandatory qualification learning hours + (plus) any PSRB required additional on-the-job training hours	-	3600	4600
8	Total apprenticeship learning hours / (divided by) 10 = credit value (rounded to nearest 10 credits)	120	360	460

Findings - Policy and Practical Impacts

Beyond the ascription of a credit value, the project also focused specifically on conveying the significant value the apprenticeship brings in terms of preparing learners for progression into HE that lead to professional registration in nursing and allied healthcare roles. This was imperative because in England there is an absence of parity with learners who have other recognised level 3 qualifications.

By ascribing a credit value, the value that is gained from undertaking the apprenticeship can be articulated in a language that admission tutors will recognise. Such awareness and recognition can encourage more people to undertake this apprenticeship, specifically as a means to progress to programmes leading to professional registration in nursing, midwifery, dietetics, diagnostic radiography, occupational therapy, physiotherapy, podiatry and speech and language therapy. Given that the UK's university admissions body is presently seeking to ascribe UCAS tariff points to apprenticeships in the same way that post-16 level 3 qualifications – such as A levels, T levels, and Applied General – are ascribed points to help determine entry criteria for university courses, there is even greater urgency to achieving some national consistency (FE Week, 2023).

Positioning on-the-job learning

Other research on apprenticeships in England has referenced and placed emphasis on the transformational aspects of teaching and learning through *on-the-job* training such as being able “to think and work outside the box” (Rowe *et al.*, 2017, p.187) and through increased individual activities such as “action learning, critical reflection, investigation...” (Lester, *et al.*, 2016, p. 23). *DfE Apprenticeship funding rules* have, curiously, removed all references to on-the-job training other than in the context of describing what off-the-job training *is not* and in being more explicit, by way of a DfE definition, that it is learning done ‘outside’ of the apprenticeship (DfE, 2023, p. 125). Such a move is at odds with an earlier impetus for the Government when it published its *Plans for Growth* which, when announcing 10,000 new advanced and higher apprenticeship places, stated:

...higher apprenticeships provide a good alternative to full-time education for young people who want to develop a career through on-the-job training (HM Treasury, 2011, p. 85).

It is also counter to IfATE guidance on the requirements for developing higher and degree apprenticeships (IfATE, 2022a). Crucially this highlights a fundamental challenge in recognising the number of hours required in an English apprenticeship to deliver full occupational competence given the absence of any statutory underpinning for conceptualising or defining on-the-job learning/training alongside that delivered as ‘fundable’ and, therefore, valued as ‘off-the-job’ learning/training. In apprenticeship terms, off-the-job learning/training activities are reasonably well specified and validated for funding and regulatory purposes and can include the teaching of theory and time spent on assignments, for example. On-the-job training is less well defined. The employment website *Indeed* sets out in its *Career Guide 2022* the advantages of on-the-job training, ranging from professional supervision and a safe space to learn to time saving benefits as individuals acquire specialist knowledge. The on-the-job training examples it gives including co-worker training, shadowing, job rotation and self-instruction align well with Billet’s suggestion (2016, p. 252) that learning on-the-job is mostly predicated “on mimesis: observation, imitation and practice”, which is all important to how individuals acquire socially derived knowledge required for occupational competence.

Conclusion

Unlike in the England system, for most European apprenticeship systems of delivery, apprenticeship learning/training *is* conceptualised in terms of both on- and off-the-job (Brockmann, *et al.*, 2020, p. iv) with formally agreed and negotiated on-the-job activities. Indeed, without giving equal priority to both forms, the current apprenticeships funding and delivery model in England – with an off-the-job requirement based on a minimum 20% of an apprentice’s normal working hours – will remain rooted in a historic mode of delivery rather than a model that reflects economic needs of the 2020s. To reflect current needs, required practice would necessarily involve how on- and-off-the-job learning is integrated, how off-the-job learning supports practice in the workplace and the development of competence, and how self-directed learning can be used in apprenticeships. The failure to sufficiently consider how on-the-job training is supported and integrated with off-the-job learning is a substantial (and contradictory) policy omission. This, after all, is the central feature of any apprenticeship programme in England. Previous and current funding policy reflect an out-of-date vision of apprenticeships in which providers deliver off-the-job learning that is then applied or exemplified in the

workplace. In reality, apprenticeships are about employers and providers working in partnership, and providers need to undertake considerable activity to integrate on- and off-the-job learning and support on-the-job learning. As Lester, *et al*, propose (2016, p. 10), the workplace is a primary site of learning and is more than just a place for gaining experience and a site of application for what has already been learned; it is, absolutely, an environment where learning can be initiated and acquired. Therefore, providers must not focus just on the statutory minimum. The three-way engagement between employer, provider and apprentice is key to understanding that all parties have a responsibility to ensure that the whole apprenticeship constitutes a high-quality preparation for meeting occupational standards.

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Appendix 1

Definition of terms used to determine total apprenticeship learning hours

Normal working hours	The hours for which the apprentice would normally be paid but excluding overtime and statutory leave entitlement. All apprenticeship learning/training must take place within 'normal working hours'.
Minimum off-the-job learning/training hours	"Off-the-job training is a statutory requirement for an English apprenticeship...The minimum requirement, for apprentices working 30 hours or more per week is an average of 6 hours of off-the-job training per week (i.e., 20% of 30 hours) over the planned duration" (DfE, 2023, p. 38-39).
On-the-job learning/training hours	Learning/training hours that are required to develop the KSBs of an apprenticeship standard that are over and above the minimum off-the-job learning/training hours and the mandatory qualification learning/training hours.
Mandatory qualification learning/training hours	The total learning/training hours indicated for a specified mandatory qualification for an identified apprenticeship standard. Typically, also indicated by the credit value (or number of credits) for a qualification based on 10 learning/training hours per credit.
Total apprenticeship learning/training hours	Either the addition of: a) the minimum off-the-job learning/training hours and the identified on-the-job learning/training hours required to develop the required KSBs for an identified apprenticeship standard; or b) the mandatory qualification learning hours and the additional on-the-job learning/training hours required (where applicable) to develop the required KSBs for an identified apprenticeship standard.

Appendix 2

On-the-job training activity template used for the senior healthcare support worker apprenticeship

On-the-job training activity	Estimated hours per week	Estimated total days	Additional information
Orientation/Induction: Activities that introduce you to your role, working practices and working environment, such as organisation specific codes of conduct and procedures.			
Shadowing: Observing the working practice of an established member of staff for a period of time, to learn about relevant aspects of your job role.			
Co-working: Working together with another employee to carry out tasks and duties in the work environment that are relevant to your job role.			
Practice simulation: Practicing a real-life scenario or procedure through simulation before you undertake it with an actual patient/client.			
Demonstration: Watching a specific task or a particular process being carried out by an established member of staff to learn how to carry out the task/process yourself.			
Self-instruction: Taking time to find out about something or to practice a procedure yourself to help you develop the knowledge, skills and behaviours relevant to your job role.			
Delegation: Being assigned a task that would normally be carried out by a colleague to help you develop knowledge, skills and behaviours relevant to your job role.			
Job rotation: Where you engage in a range of job roles/activities to help you develop knowledge, skills and behaviours relevant to your apprenticeship.			
Other activities, please specify:			
Total			