

January 2018 Proposal to develop a new apprenticeship standard

Page 1: Proposal to develop a new apprenticeship standard

Q1. Please confirm that you have read the "How to" guide for Trailblazers on gov.uk (see link here), that you are content that this proposal meets all the criteria for final approval set out within it and that you have discussed the proposal with a relevant Route Relationship Manager within the Institute (Please specify who).

I have read the 'how to' guide for Trailblazers on gov.uk? Yes

Name of my Relationship Manager

Martin Keeves

Q2. Name of proposed trailblazer group

Public Sector Compliance Officer / Investigator Trailblazer Group

Q3. Are you an existing Trailblazer Group already with approval to develop other standard(s)? If yes or partly, please provide full details.

No

Q4. Name of proposed apprenticeship standard(s).

Public Sector Compliance Officer / Investigator

Q5. Is this a proposed core and options standard? If yes, please give the titles for each of the options.

Yes, this proposal is a core and options standard

Titles:

HMRC: Compliance Officer

Gambling Commission: Casework Investigator and Compliance Manager

DWP: Compliance investigator and Compliance Manager

Care Quality Commission: Assistant Inspector

Q6. How many standards are you proposing to develop? Please be aware that commitment from at least 10 employer members for each proposed standard is required.

We are proposing a single Level 3 Standard.

To identify potential Trailblazer Group members we reviewed vacancies for Civil Service, arms-length bodies, local authorities and commissions, identifying those with a compliance/investigation element. We contacted those organisations to establish any existing apprenticeship activity, and advise our intention to form a Trailblazer Group.

Since the previous proposal was rejected we have gone to considerable lengths engaging all potential public bodies and we are satisfied this trailblazer group is reflective of all the employers that recruit public sector compliance/Investigation officers.

Q6. How many standards are you proposing to develop? Please be aware that commitment from at least 10 employer members for each proposed standard is required.

Whilst we reviewed vacancies held by employers in the private sector, we quickly identified that their focus was to support compliance on a consultancy basis, with an additional focus on marketing. This differs from our occupation, which focuses on developing specialist knowledge and techniques for investigating and tackling non-compliance.

A sample of private sector roles can be found at Annex A.

Q7. Will there be a requirement for additional new standards to be developed in the future? If so, please provide brief details of what these will be.

This standard meets the needs of employers, so we do not anticipate a need for additional new standards at the current time.

There are already standards at higher levels which meet the needs of some of the Trailblazer members therefore it would not be appropriate to generate any further standards.

Q8. Have you submitted a proposal for an apprenticeship standard in this role(s) before? If yes, please give details below including comments from the (pre April 2017) DfE approvals panel or the Institute.

Yes, a submission was previously submitted in March 2017 by HMRC to the Department for Education (DfE). This made the case for a stand-alone, HMRC specific standard, focused explicitly on tax.

The proposal was rejected by the panel in May 17, subsequent to the formation of the IFA. The reasons provided were (a) not meeting the 10 employer criteria, and (b) not showing sufficient transferable skills.

In response to the feedback, HMRC took the opportunity to re-visit the standard and focus on the occupation itself; compliance and investigation. This has enabled HMRC to widen the Trailblazer Group membership, working together to evolve a potential standard which supports the development of compliance/investigative skills transferable across the public sector.

Q9. Please insert details about each proposed standard below.

	Name of occupation	Proposed level of the standard	Proposed as a degree apprenticeship?	Intended to replace/partly replace an existing apprenticeship Framework? [if so please give details]	Do you expect any age restrictions to apply to this standard?	Estimated annual take-up across entire relevant sector(s) (This is separate to the number of apprentices that each individual employer group member will take on)	When do you estimate this apprenticeship would be ready to deliver starts?
1	Public Service Compliance Officer / Investigator	3	No	No	18	570	May 2018. Although ambitious, this is to align with anticipated

Q9. Please insert details about each proposed standard below.

							Government recruitment activity.
2	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-
7	-	-	-	-	-	-	-
8	-	-	-	-	-	-	-
9	-	-	-	-	-	-	-
10	-	-	-	-	-	-	-

Q10. <https://www.gov.uk/government/publications/apprenticeship-standards-in-development> Please provide any relevant information below regarding potential overlap with other Trailblazer standards published or in development. It is important that you review your proposal against all other apprenticeships published and in development to confirm there is no significant overlap, in overall occupation or in the content of potential skills/knowledge/behaviours. Where there is potential of any overlap, we ask that you contact the existing Trailblazer(s) before submitting a new proposal to discuss whether the existing standards would cover your needs (or email apprenticeship.trailblazers@education.gov.uk). Please then provide below full details of any possible overlap identified, interaction with relevant Trailblazers, and any relevant further detail explaining why this occupational role is sufficiently unique to still justify separate apprenticeship standard. The existing list of standards in development, is here [The list of existing published standards and Trailblazer contact details, is here](#)

Below is a summary of the key differences that explain why our proposal differs from existing standards published, or in development. For ease, please see appendix B for a comparison of the knowledge, skills and behaviours for each standard.

Existing Standards

Compliance Risk Officer (L3)

This standard is focused on financial services organisations specifically, and their regulators. Additionally, this standard requires completion of a qualification, whereas our proposal does not. We spoke with the Trailblazer lead, Emily Austin, on 25/09/17 to explore options for modification of the standard. Emily advised this would need to be undertaken as part of the official review of the standard. The official review period was 2019, and Emily made clear that at that point the decision to amend requirements or make changes to the focus of the standard would be taken by the trailblazer group as a whole. She further advised that as this would require rewriting of the assessment plan and resubmitting, appetite for this was likely to be low.

Public Service Operational Delivery (L3)

This apprenticeship is for those who provide front line services to the public. Its emphasis is on customer service, rather than investigation. This role is distinctly different from compliance / investigation roles. It does not deliver the following skills and knowledge, which are key to a compliance/investigator role: commercial understanding, evidence gathering, and case management. This profession and standard is well established. It is widely used across HMRC and DWP, but is not suitable for the role profile we have identified.

Professional Accounting Tax Technician (L4)

This standard is aimed explicitly at those individuals who work with financial information, developing knowledge in standard accounting and tax practices. The knowledge requirements include technical understanding of double entry bookkeeping and financial reporting. Our proposed standard focuses primarily on investigative knowledge and skills, and is applicable across many areas, represented by the

Q10. <https://www.gov.uk/government/publications/apprenticeship-standards-in-development> Please provide any relevant information below regarding potential overlap with other Trailblazer standards published or in development. It is important that you review your proposal against all other apprenticeships published and in development to confirm there is no significant overlap, in overall occupation or in the content of potential skills/knowledge/behaviours. Where there is potential of any overlap, we ask that you contact the existing Trailblazer(s) before submitting a new proposal to discuss whether the existing standards would cover your needs (or email apprenticeship.trailblazers@education.gov.uk). Please then provide below full details of any possible overlap identified, interaction with relevant Trailblazers, and any relevant further detail explaining why this occupational role is sufficiently unique to still justify separate apprenticeship standard. The existing list of standards in development, is here [The list of existing published standards and Trailblazer contact details, is here](#)

Trailblazer group; namely health, tax, customs, and gambling.

Assistant Accountant (L3)

This standard is aimed at those who work in a supporting role, again focused specifically on finance and therefore not applicable to the public sector roles we have identified. Although there is a requirement to understand compliance with financial regulations, this is with a view to supporting compliance, not investigating non-compliance. Often, people in these roles would engage directly with public sector compliance officers / investigators (the roles identified in our proposal).

Standards in Development

Regulatory Compliance officer (L4)

This standard is focused primarily on regulatory roles within local authorities. The main difference is the investigative focus of our proposal versus the regulatory emphasis within this proposal. The Level 4 standard is aimed at those who are working with businesses to support their understanding of and compliance with often complex regulations. Our proposal is firmly focused on those whose core role is investigative; gathering evidence, identifying gaps and pursuing particular lines of investigation. Our focus is on the front line organisations, with whom the regulatory compliance officers would expect to interact over issues of non-compliance.

HMRC met the trailblazer lead in July 2017, when we were advised there were no plans for a Level 3 standard, as the members feel that is too low level for their requirements. We do remain in touch with the trailblazer lead and are aware of their future aspirations for a Level 6 standard.

Revenues and Welfare Officer (L4)

Conference call held with Trailblazer representative on 12/10/17 to explore opportunities for collaboration. We discussed whether there was any opportunity to work together on the standard in development.

Whilst we identified a common requirement for knowledge of legislation, policies and procedures, and a shared focus on ethical standards, a number of key differences in our requirements precluded joint working. These were:

- We are seeking to develop a Level 3 standard, while a Level 4 is the appropriate level for them.
- Their standard focuses on supporting and enabling compliance, especially in areas specific to local government, for example council tax
- We are seeking a standard that focuses on tackling non-compliance through investigative and case work, in areas applicable nationally and across the public sector. Explicitly, this does not form part of the Revenues and Welfare role, which is specifically aimed at those working with local authorities and Local Government Finance Acts.

By way of illustration, while they have identified the following core skill, "Evaluate the customer's financial position, assisting with personal budgeting where appropriate, or directing the customer to appropriate support", HMRC is forbidden by law from giving tax or financial advice. We agreed to keep in touch to share learning and examples of best practice where appropriate.

Q11. Please provide a full description below of what the occupational role involved (or roles in the case of a proposed core and options standard). The information you provide here is crucial to our assessment of whether the occupational role is suitable for an apprenticeship, so please be as comprehensive as possible, and always refer to the criteria and guidance set out in the "How to" guide for Trailblazers. In particular, the information should include: Main duties and responsibilities - please set out clearly what someone in this occupation will actually be doing; the range of environments/sectors/industries in which someone in this occupation could work; a summary of key competencies/skills etc required for full occupational competence; how the occupational role typically fits within the wider work hierarchy; who would they be working with, and what is the usual relationship between the roles.

Role/Occupation:
Compliance Officer / Investigator

Occupational Profile:
Compliance Officers / Investigators will play a vital role within the Public Sector. While the majority of people and businesses are compliant with the rules and regulations set out by government, for example in respect of taxes, benefits and pensions, and how services are run and regulated, a minority of people/organisations accidentally or deliberately fail to comply with their responsibilities. To tackle this, a number of government departments and agencies incorporate an investigation/compliance function, to seek out, identify and tackle non-compliance using civil and criminal routes. These roles ensure deliberate non-compliance, fraud and error in services accessed by the public are kept to an absolute minimum, protecting revenue and the public, and driving customer/business/organisation compliance. This is achieved by conducting risk-based compliance checks and investigations, effectively using legislation, case law, policy and guidance so that casework can be carried out with integrity and with minimal opportunity for technical error.

Role Profile:
This role will typically sit within customer compliance areas or inspection/investigative functions. Within a specific government department, a fully competent employee at this level will be capable of a customer-facing role with a strong emphasis on customer/business/organisation compliance and investigations. Individuals in these roles may manage their own caseload, and will be responsible for collaborating with stakeholders, including legal and technical experts. Individuals may also be required to act within a larger investigation team, carrying out parts of a more complex investigation as directed. This is a Core and Options model, where the shared knowledge, skills and behaviours are covered in the core, with the specific technical knowledge and skills required for each role being covered in the single chosen option.

Below is an overview of the role and typical job titles covered by each option:

1. Compliance Officer

These roles are within HMRC, the UK's tax authority, and drive tax compliance. Typical duties include:

- conducting risk-based compliance checks into the affairs a range of customers, including highly complex businesses, making compliance checks in line with departmental guidance and strategies in order to challenge, investigate and quantify non-compliance

- providing customers, whether internal or external, and using any of HMRC's recognised means of communication, with clear and constructive guidance in areas such as customer education, risk assessing and complaints handling, preparing and, where appropriate, presenting cases before Independent Tribunals

Typical job titles: Labour Market Investigator, Company Accounts Team Officer, Government Banking Officer, Criminal Investigator, Hidden Economy Investigator

2. DWP Compliance Officer/ DWP Investigations Officer

These roles are within DWP Counter Fraud and Compliance Directorate to eradicate benefit Fraud and Error. Typical duties include:

- Conducting initial investigation with information available through DWP resources to ascertain low or high level fraud.
- Conduct robust Interviews at times under Caution in accordance with The Police and Criminal Evidence Act 1984 (England and Wales) and Common Law (Scotland).
- Liaise with other departments/organisations such as Local Authorities (LAs), Police and HMRC within the framework of any existing partnership agreements.
- Comply and keep up to date with the appropriate learning and processes for health and safety, and security, demonstrating 100% compliance with the department's policies and standards.

Q11. Please provide a full description below of what the occupational role involved (or roles in the case of a proposed core and options standard). The information you provide here is crucial to our assessment of whether the occupational role is suitable for an apprenticeship, so please be as comprehensive as possible, and always refer to the criteria and guidance set out in the "How to" guide for Trailblazers. In particular, the information should include: Main duties and responsibilities - please set out clearly what someone in this occupation will actually be doing; the range of environments/sectors/industries in which someone in this occupation could work; a summary of key competencies/skills etc required for full occupational competence; how the occupational role typically fits within the wider work hierarchy; who would they be working with, and what is the usual relationship between the roles.

3. Assistant Inspector

Assistant Inspectors (AI) are roles in the Care Quality Commission. AI's can be placed in Hospitals, Adult Social Care or Primary Medical Services inspection teams. They typically:

- Assist CQC inspectors to undertake tasks essential to the delivery of high quality inspections.
- Mitigate risk to people who use services and to CQC by assisting inspectors to respond promptly to safety concerns.
- Actively engage with all parts of the CQC that contribute to the delivery of a successful inspection.

4. Casework Investigator and Compliance Manager

These roles are within the Gambling Commission, who regulate the people and businesses that provide gambling in the UK.

Casework Investigators typically:

- Lead on high profile, complex cases and are responsible for the management of multi-disciplinary teams, identifying case issues and solutions / outcomes, with risk control measures in place
- Manage cases to high standards, in accordance with legislation, policies and procedures, and in a timely and cost effective way, balancing conflicting priorities and resource demands
- Articulate complex issues to an operator's key senior personnel and will lead on any co-working relationships with partners and other stakeholders.

Compliance Managers deliver risk-based regulation across the gambling industry by

- Carrying out compliance risk assessments and targeted visits to gambling operators in all sectors
- Applying legal and other provisions, and have the capability of dealing with businesses, public and regulatory agencies in an advisory capacity
- Undertaking risk management work within a regulatory context.

Q12. Please provide an overview of the knowledge, skills and behaviours required for these roles.

Entry requirements: Individual employers will set the selection criteria for their Apprenticeships

Requirements:

Core Knowledge – required by all apprentices

Legislation, policies and procedures

- Understands the basic principles of the relevant legal framework, powers and legislation and how these apply to their role.
- Knows how to progress and resolve technical issues by applying the relevant legislation and powers.
- Understands the relevance and appropriate application of departmental policies (such as employee code of conduct and relevant policies concerning ICT and data governance).
- Has an awareness of the Data Protection Act (DPA) s29(3) and s35 and the Freedom of Information (FOI) Act 2000, understands the potential impact on investigations and how to apply these when accessing open and closed sourced data.

Analysing and Interpreting Data

- Understands how to systematically gather, examine and analyse customer records/data/information using departmental policies, principles and standards to identify potential inaccuracies and anomalies.

Q12. Please provide an overview of the knowledge, skills and behaviours required for these roles.

- Knows how to use information about customers to make informed judgements. Understands how to prepare and present findings in relation to irregularities in data.

Commercial Understanding

- Understands how their customers operate, specifically how they are managed and (if appropriate) financed and how external factors affect their behaviour.
- Knows how to gather a range of information about the customer's business environment/situation and how to use this to determine the most effective approach to the case.
- Uses knowledge of customer's business and activities to identify risk.
- Demonstrates awareness of the range of business types and structures and how these affect business behaviour, and uses this knowledge to identify risk

Ethical Standards

- Demonstrates an awareness that ethics and integrity are fundamental when dealing with customer information by applying the relevant Ethical Standards to their own behaviour and appropriately challenging actions of others where they do not meet these standards.

Systems and Processes

- Understands the systems, tools and processes used in the role, together with the standards to be met, including IT tools. Understands how these interact with the wider organisation where applicable.

Core Skills – required by all apprentices

Team Working and Collaboration

- Liaises with their team and technical and policy specialists, maintaining effective, professional working relationships both internally and externally across organisations.

Evidence Gathering

- Establishes facts using an investigative approach.
- Identifies, collects, stores and disseminates evidence in a correct and lawful manner.
- Handles sensitive information securely.

Case management

- Opens and maintains case files in accordance with organisational standards.
- With appropriate support can plan and prioritise investigations.
- Understands why recording investigation evidence is necessary and adopts best practice to ensure all records relating to investigations are accurate and comprehensive.
- Researches and prepares appropriate questions for interview to inform the plan for the relevant individual to conduct.
- Presents fact based evidence to customers/third parties to progress case/issue
- Identifies and address risks, issues and anomalies to bring cases/investigations to conclusion
- Knows how to draft concise, clear and accurate reports; write clear and concise letters, e-mails and other items of correspondence.
- Understands the need to build and maintain new partner/stakeholder relationships with those involved in investigations to achieve progress on objectives, key initiatives and shared interests.

Risk Assessment

- Uses departmental risk assessment methodologies as a tool to support compliance, including planning and undertaking interventions that target and are proportionate to the identified risk.

Core Behaviours – required by all apprentices

Ethics & Integrity

- Honest, sincere and trustworthy in their actions. Shows integrity by doing the right thing. Maintains appropriate confidentiality at all times.

Professional Effectiveness

- Continuously develops their professional capability to meet the needs of the business and its customers. Effectively manages their time, workload and priorities to deliver a quality service. Resolves problems and adapts to new situations. Develops and shares their professional expertise to build the capability of colleagues within their team

Q12. Please provide an overview of the knowledge, skills and behaviours required for these roles.

Making Effective Decisions

- Uses sound judgement, evidence and knowledge to arrive at accurate, expert and professional decisions and advice. Is careful and thoughtful about the use and protection of government and public information to ensure it is handled securely and with care.

Collaborating and Partnering

- Works collaboratively, sharing information appropriately and building supportive, trusting and professional relationships with colleagues and a wide range of people inside and outside the Civil Service, whilst having the confidence to challenge assumptions.

Options (the apprentice will undertake one of the specialist options detailed below, dependent on their job role)

Option 1 - Tax Compliance Officer (HMRC)

- Technical knowledge and understanding of cross tax compliance and specialist tax regime products.
- Familiarity with tax legislation, case law, processes, systems and guidance.
- Knows how to gather and analyse customer insights and can demonstrate how they consider the impact and adapt their approach to effectively manage their relationships with customers.
- Analyses customer information to assess the level of risk and mitigating actions/or to establish non-compliance.
- An understanding of how to manage difficult or confrontational interactions, potentially including face to face interviews on business premises.

Option 2 - Compliance Officer / Investigator (DWP)

- Technical knowledge of DWP benefits and systems.
- Comply with legal and policy requirements, such as Police and Criminal Evidence Act 1984 (England and Wales), Common Law (Scotland) and Criminal Procedures and Investigation Act 1996.
- Attend external professional training such as Accredited Counter Fraud Investigation programme (ACFIP)

Option 3 - Assistant Inspector (Care Quality Commission)

- Understanding of hospital and mental health management structures and resourcing
- Assembling and planning an inspection team

Option 4 - Casework Investigator and Compliance Manager (Gambling Commission)

- Understanding of the legislation controlling gambling
- Technical knowledge and understanding of consumer behaviour and technology trends

Q13. How will the apprenticeship allow the individual to develop transferable skills to perform the role in a business of any size or relevant sector?

The partners in the trailblazer group range in size from a few hundred employees to tens of thousands. We have worked together to identify knowledge, skills and experience that will enable an apprentice to perform the role in an organisation of any size. Whilst the nature of non-compliance may vary across the organisations, the competences needed to perform the role remain the same.

Furthermore, the skills and behaviours developed in this role would provide a foundation on which apprentices could build a career in a wide diversity of pathways within their chosen option, or in the private and commercial sectors. For example, HMRC staff are in high demand with global firms such as KPMG, Ernst and Young, and Deloitte.

Once apprentices are in the Civil Service, they will also be able to use their skills in other government departments, agencies and arms-length bodies. This opens the opportunity for a broad range of careers in the UK and overseas. The Civil Service actively encourages secondments and loans to other government departments, offering staff the opportunity to demonstrate the transferability of their skills. All civil servants, including apprentices, receive support in developing the core competencies needed by apprentices to allow them to move between departments.

Q14. Will the occupation require rigorous and substantial training of at least 12 months prior to the end-point assessment to achieve full competence, with off-the-job training accounting for at least 20% of the apprenticeship? Please provide detail of what this will include.

Yes, the occupation will require at least 12 months substantial training. Off the job learning typically includes classroom and e-learning, self-study manuals, shadowing, mentoring, and action learning sets. Typically this is embedded through experiential learning, where the apprentice will have the opportunity to practically apply the learning on the job.

The core training will develop an apprentice's familiarity with the appropriate legislation, case law, policy and guidance so their casework can be carried out with integrity and with minimal opportunity for technical error. Additionally they will learn about their powers to require information and the appropriate sanctions they can impose if necessary.

They are trained to analyse and review data, and be expected to quickly develop a view on the compliance level of the submission, identifying potential errors or inconsistencies. Using this judgement, compliance officers / investigators will then be expected to establish risk levels, and develop a targeted compliance check strategy.

Apprentices will also undertake learning on Customer Service, Communication, Health and Safety, Analytical Thinking, Equality & Diversity, and Leadership and Management.

Q15. What will the duration of the apprenticeship be?

Typically 12-18 months

Q18. Please provide details below of any professional body recognition of this standard. This should include information on what this will be.

Professional body recognition is not appropriate for this standard. As government departments, it would not be appropriate to endorse a single professional body by selecting them to accredit. Additionally, the cost would be prohibitive.

Q19. We are committed to ensuring that the standard we design provides sufficiently transferable skills to enable a successful apprentice to perform this role in an employer of any size and in any relevant sector. We are collectively representative of our sector(s) and are willing to work with other employers who come forward with an interest in this occupation and with colleagues from other sectors where our standards are closely related. We will develop the apprenticeship standard and assessment plan in line with the latest edition of the Institute's "How to" Guide for Trailblazers, will aim to complete this process within a year and are committed to working with relevant sector organisations to promote the use of the resulting standard once it is ready for delivery.

Yes

Q21. I am happy for my organisation to be publicly named as the lead employer and the companies listed above are happy to be named as working together to deliver this is the standard is approved for development

Name of lead organisation HMRC

Q22. Name and email address of contact we can use publicly on the gov.uk website (and Institute website when ready) as a contact point for any enquiries relating to the Trailblazer. (By filling out this box you consent to the publication of these details. If you wish to opt out please leave this box blank)

Name of public contact Jess Pearce
Email address Jessica.pearce@hmrc.gsi.gov.uk

Q24. Do you have a copy of the draft standard? If so, please include it with your submission.

- File: 180117 Compliance_Investigation Officer Apprenticeship Standard.docx
- File: 180104 Appendix A Private Sector FINAL scm.docx
- File: 180104 Appendix B Standards Comparison FINAL scm - Copy.docx

Add comments below:

Draft Standard, Appendix A and Appendix B attached.

Q25. In future, Technical Education will be arranged around the common framework of 15 technical education routes identified in the Sainsbury Review. These encompass all employment-based and college-based activity. The aim of these new routes is to facilitate the progress of young people from compulsory schooling into skilled employment and the highest levels of technical competence. A technical route could be followed either through an apprenticeship or in a college where the training would be supported by a substantial work placement, with both programmes being based on employer-designed occupational standards. In light of this, we have introduced a new criterion requiring any standard approved for development to align with one of the 15 technical routes. Details of the 15 routes can be found on page 22 of the Government Skills Plan here. Please detail which of the 15 Sainsbury Technical Education Routes your standard(s) aligns to. Also, if an occupational map is available for this route, there will be a link to it on the "How to" Guide for Trailblazers webpage. Please refer to this and specify which occupation detailed in the route map your proposed standard covers.

	Proposed Standard (s)
Agriculture, Environmental and Animal Care	-
Business and Administrative	-
Catering and Hospitality	-
Childcare and Education	-
Construction	-
Creative and Design	-
Digital	-
Engineering and Manufacturing	-
Hair and Beauty	-
Health and Science	-
Legal, Finance and Accounting	Public Sector Compliance Officer / Investigator
Protective Services	-
Sales, Marketing and Procurement	-
Social Care	-
Transport and Logistics	-