

Policy Briefing – Apprenticeship End Point Assessment

Purpose

The purpose of this report is to set out the position of the Skills Federation and its members on end point assessment in apprenticeships in England.

Background

All apprentices must take an independent assessment (EPA) at the end of their training to confirm that they have achieved occupational competence. The purpose is to give employers confidence that apprentices completing an apprenticeship standard can perform in the occupation they have been trained in and can demonstrate the duties, and knowledge, skills and behaviours (KSBs) set out in the occupational standard.

The trailblazer groups that develop the apprenticeship standards also develop the end point assessment plans. EPAs can take a wide range of forms. They should typically include two distinct assessment methods (or one method plus an integrated qualification). Assessment methods include an observation in the workplace, practical and written tests and interviews. Whilst the guidance states that ‘typically’ two assessment methods are used, many apprenticeship plans state three, and there are some sectors where employers would like more to be specified.

With the exception of integrated degree apprenticeships, the end point assessment has to be carried out by an independent third party organisation which has not been involved in the training or employment of the apprentice and has no conflict of interest. The choice of end point assessment organisation is made by the training provider or the employer and they must select an organisation that is registered on the Department for Education's (DfE) apprenticeship provider and assessment [register](#) (APAR) for that apprenticeship standard. There are currently around 280 organisations on the list. The price for the end point assessment is negotiated with the End Point Assessment Organisation (EPAO) and is not expected to be more than 20% of the total funding available for the apprenticeship.

The Institute for Apprenticeships and Technical Education (IFATE) have the statutory duty for external quality assurance of EPAs. Following a consultation in 2020 IFATE moved to a simpler version of external quality assurance and (with a few exceptions) EPAOs are now regulated by either Ofqual or the Office for Students, depending on the level of the apprenticeship standard.

Any organisation wishing to deliver a regulated EPA must gain Ofqual recognition. Gaining Ofqual recognition is a legal undertaking which will bring the applicant organisation into statutory regulation. This is a rigorous process where organisations must demonstrate that they meet Ofqual's four criteria.

Views of delivery organisations

The Association of Employment and Learning Providers (AELP) carried out a [survey](#) of its members about EPA in June 2023. As part of this providers were asked to list their top three areas of priority for EPA going forward. Whilst a wide variety of responses were received, common themes were identified including:

- Increased consistency across EPAOs and standards within the same EPAO.
- Consistency in use of systems and improved responsiveness of EPAOs.
- Availability of EPA slots; both location and times.
- Improved feedback provided to apprentices following EPA from EPAOs

The Association of Colleges (AoC) has also made recommendations in recent [reports](#) that propose due consideration should be given to colleges carrying out their own end point assessment and being able to customise a percentage of standards. The report quotes the figure that 97% of apprentices that undertake an EPA achieve an apprenticeship (as opposed to the much lower percentage of apprentices that don't get to the point of taking an EPA). This is not surprising as apprentices that undertake an EPA will have met the requirements of Gateway.

The Federation of Awarding Bodies (FAB) identifies in its [overall position](#) on apprenticeships four priorities, three of which relate to EPA:

- Prioritising member concerns over regulation which create barriers to effective delivery of end-point assessment (EPA)
- Bringing together the EPAO sector to enhance quality and achievement in apprenticeships, identifying risks and opportunities for our members
- Championing the role of robust, independent EPA in the future of apprenticeships

Current situation

The guidance about how EPAs need to be carried out has not remained static since the introduction of apprenticeship standards. IFATE have carried out reviews and have made changes on the back of this. The example of changes to external quality assurance is one. Fairly recent changes have also been made to the number of expected assessment methods, the extent to which the entirety of all KSBs need to be assessed, and around grading.

In March the then Minister for Skills Robert Halfon set out in a [letter](#) to the sector a number of areas where apprenticeships need to evolve. The letter includes the statement “*we will identify further options to improve the assessment model, making it more efficient for the whole sector.*”

Following this, in May, there was an [article](#) in FE Week which stated that DfE was about to start a trial of different options for EPAs. The trial would take place by the expert apprenticeship training providers [group](#). The options stated included:

- training providers carrying out part of the EPA,
- transfer the assessment of “behaviours” from EPAOs to employers
- remove the need for all knowledge, skills and behaviours to be assessed.

Post election there have not been any formal announcements from DfE about the pilot. However, informal intelligence from a range of sources would indicate that the pilots are being undertaken and that options will be considered.

Analysis

As the main membership bodies for both providers and awarding organisations have suggested areas where EPAs need to be improved, it seems clear that there is scope to review and to consider making some changes. However, in making changes, the risks need to be carefully considered.

Relatedly, the introduction of EPAs brought in a very different way of working from delivery of apprenticeship frameworks which were a group of qualifications. It has taken time to embed and there are a lot of examples of where it is now working well and where EPAOs have matured and employers have confidence in the process and more importantly, in the

outcomes. Whilst it's always good to review and improve, any changes should be made in the context of building on and amending what exists, not starting from scratch.

This section takes the options outlined as potential areas for test and trial as a starting point.

Training providers carry out EPAs

AoC argue that colleges are large organisations which are well-used to managing and delivering on a range of disparate activities. They are able, therefore, to put effective ethical walls in place and to be able to retain the rigour required. This is undoubtedly the case for many colleges. However, colleges deliver less than a fifth of apprenticeships (17.4% in 2022/23). Some colleges and some (particularly smaller) independent training providers may not have the capacity or capability to be able to do this with the right level of rigour so it seems unlikely that this would be able to be implemented in all cases. A mixed economy where some EPAs were carried out by independent EPAOs and some by apprenticeship providers would be a confusing landscape for both employers and apprentices.

If the model for integrated degree apprenticeships was rolled out more widely there is a question about how much money would be saved. This is because EPAs within integrated degree apprenticeships still requires higher education providers to be an EPAO on the register and to meet Office for Student requirements for external quality assurance. The requirements include at least one assessor to be from the occupation and all assessors to be separate from the training part of the apprenticeship. If colleges and providers were to become EPAOs under the current rules, they would need to demonstrate that they met the requirements of Ofqual.

A different model that removed the requirement for EPAOs altogether would potentially be cheaper. However, moving away from EPAs being carried out by an independent organisation would be a huge risk to quality and rigour for a number of reasons:

- Firstly, and most importantly, there would be an inherent conflict of interest because achievement rates are an important indicator of quality for the both the ESFA and Ofsted. The achievement rate for 2022/23 was only 54.3% which is still too low, and pressure to improve achievement rates would risk poor decisions about EPAs being made.
- Apprenticeship providers don't necessarily have staff with the right skills, technical knowledge and recent/current experience of industry to carry out EPAs. This is particularly the case for some of the growth areas where specialist technical knowledge is required including green skills and technology. This means they would need to bring people in on a contracted basis which risks de-stabilising the already fragile supply of assessors.
- There is a particular risk for occupations with industry regulators which require independent assessment to ensure that competence can be demonstrated, and in safety critical industries where 100% competence must be demonstrated.

Employers assess behaviours

Many employers have stepped up and been part of trailblazer groups helping to develop the apprenticeship standards and end point assessment plans. However, previous work carried out by the Skills Federation has highlighted that development of end point assessment plans is one area where employers don't feel confident. The concerns are around whether they are the best organisations to be carrying out what is a technical task requiring specialist knowledge to do this well.

Devolving responsibility to employers to assess behaviours against the apprenticeship standard risks falling into the same category. Whilst employers are possibly well-placed to be

able to observe the behaviours displayed by apprentices in the workplace, not all will be comfortable and confident in assessing against the standard, and there is a risk that standardisation would be difficult. Currently EPAOs having standardisation practices in place to ensure behaviours are assessed across the industry, and not just against internal metrics. There is also a related risk that additional requirements for employers may provide a disincentive to engage, particularly for smaller employers with less capacity.

Remove the need for all knowledge, skills and behaviours to be assessed

IFATE have already made changes to review how far all knowledge, skills and behaviours need to be assessed in their entirety and guidance on their website now states “Although all KSBs will be mapped to an assessment method this does not mean that all KSBs will be directly assessed.” The original proposed wording was to “Although all KSBs will be mapped to an assessment method this does not mean that all KSBs will be assessed” but concerns were apparently raised about this change which led to the revised wording.

There are different views on what this might mean in practice and how far a further change which may mean that some KSBs are not assessed at all would negatively impact quality. For apprenticeship standards in high-risk occupations, for example, there would be concerns around safety. For apprenticeship standards in other sectors there may be fewer concerns and apprenticeship providers and employers may welcome a more streamlined approach.

It is unlikely that a one size fits all approach will be appropriate. Any pilots should ensure that they focus on a range of sectors and have an appropriate balance between rigour and simplification.

Recommendations

The Skills Federation recommends the following:

- Retain a focus on quality and rigour as paramount and do not move away from the current model where EPAs are carried out by an independent third-party organisation.
- Do not introduce additional demands on employers, particularly ones which the majority of employers would struggle to find the capacity and capability to fulfil.
- Review the processes around EPA to ensure they are proportionate and of benefit to apprenticeship providers, employers and apprentices.
- Any pilots should cover multiple sectors and the results and proposed changes tested with sector skills bodies to ensure that there is sufficient flexibility to meet needs within and across the full range of sectors.
- Changes should only be made where necessary and retain what is working well within the current system and not start from scratch. The EPA system has taken a while to mature and there are still challenges around numbers of assessors.

Sources

- AELP survey of members – June 2023 - [link](#)
- AoC 100% opportunity: the case for a tertiary education system – April 2024 - [link](#)
- AoC Opportunity England Apprenticeships – April 2024 - [link](#)
- IFATE guidance on developing an EPA - [link](#)
- DfE Funding Rules for Apprenticeship 2024/25 – August 2024 - [link](#)
- Federation of Awarding Bodies – policy statement on apprenticeships - [link](#)
- FE Week article on EPA pilots – May 2024 - [link](#)
- Apprenticeship Achievements. An Update for the Sector. DfE. March 2024 [link](#)
- DfE Apprenticeship data - [link](#)