



Institute for Apprenticeships
& Technical Education

External Quality Assurance Annual Report 2020

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Introduction

This report provides an overview of findings from the first full year of external quality assurance (EQA) activity under the Institute for Apprenticeships and Technical Education's EQA Framework (published June 2019).

End-point assessment sits at the heart of the government's reforms of apprenticeships over recent years. Undertaking a holistic, independent and rigorous assessment of an apprentice's occupational competence provides employers with assurance that the apprentice can 'do the job' in their chosen occupation at the end of their apprenticeship. This is an innovation in the apprenticeship sector in England, replacing the previous reliance on on-programme acquisition of qualifications, and sign-off by training providers. But it is also unusual within other technical and vocational qualifications, and innovative internationally.

A number of the challenges presented by end-point assessment are common to any other assessment or qualification: how to maximise the validity of the assessment, to ensure it is reliably and fairly marked and graded, or that it can be delivered manageably and in an efficient way.

But it also presents unique challenges regarding how to regulate and quality assure the processes and organisations involved. Individual apprentices being independently assessed through, for example, observation on the job at a range of different workplaces across the country present radically different challenges in terms of regulation and quality assurance than those of, say, a large cohort of schoolchildren sitting an exam at the same time and under the same conditions; or to vocational learners being assessed through a portfolio of evidence signed-off by their employer or training provider. And it is important to recognise the uniquely employer-driven context of end-point assessment. Assessing occupational competence against standards developed by employers has conceptual and practical implications for a range of assessment practices.

We have therefore over recent years, put in place a new system for overseeing and evaluating the quality of end-point assessment. In June 2019 the Institute published an EQA Framework built around five principles (relevance, reliability, efficiency, positivity and learning) to which all end-point assessment and EQA would adhere. EQA activity undertaken in-line with the Institute's framework is designed to: monitor how closely end-point assessment is delivering against the principles; review consistency between different end-point assessment organisations (EPAOs) approved to assess the same standard; and, finally, report the strengths and areas for improvements for specific assessment plans and for individual EPAOs.

Over the last year, EQA providers have undertaken a wide range of quality assurance activities and generated hundreds of reports, giving us a unique insight into the strengths and weaknesses of the end-point assessment system as a whole, and of individual standards, assessment plans and EPAOs.

We know that good end-point assessment is delivered by organisations that are able to successfully combine strong occupational insight with a good understanding of the theoretical and practical nuances of assessment. Good end-point assessment also tends to be delivered by organisations with robust internal quality assurance and management arrangements; and where attention is paid to the needs of the apprentice and employer as customers.



Jennifer Coupland,
Chief Executive

Conversely, we know that where end-point assessment does not meet the standards we expect, it is often the result of organisations with a weak understanding of either or both the occupation and assessment practice; or with weak internal quality assurance and management regimes. EPAOs which have tried to apply internal quality assurance approaches or assessment approaches that have worked in another setting without adapting them to the specific needs of apprenticeships, end-point assessment, or to the specific assessment plan, have generally been less successful and this is unacceptable.

And, beyond individual standards and EPAOs, EQA activity highlights challenges that the Institute and ESFA need to resolve with the end-point assessment system: that the data we collect is not always available to the right people at the right time to inform and drive activity; that we need to maintain vigilance around upfront approval and readiness checks of EPAOs; or that we need to continue our improvement work to ensure that all end-point assessment plans contain sufficient detail to allow EPAOs to develop consistent and reliable assessments.

EQA monitoring provides a hugely useful insight into assessment delivery, and into the overall health and performance of the still very new end-point assessment system. There are also some things that will only be knowable over a longer timescale: whether different grades at end-point assessment are correctly and meaningfully discriminating between different levels of competency in all cases; the strengths and shortcomings of different assessment methods in different sectors; the value over time to employers and apprentices of different types of end-point assessment. We intend to interrogate these questions over time with the benefit of increased volumes of end-point assessment delivery and proper longitudinal evaluation.

As with all areas of life, the end-point assessment sector has during 2020 been profoundly affected by the COVID-19 pandemic and ensuing restrictions. Assessment methods such as workplace observations and professional discussions were immediately made difficult if not impossible by social distancing rules and travel restrictions. Furthermore, as businesses and sectors were impacted by the unprecedented circumstances, apprentices found themselves working in very different roles, working at the front-line of the nation's response to the pandemic, working from home, furloughed or unfortunately made redundant. None of these circumstances affecting apprentices were conducive to undertaking the agreed and approved approach to end-point assessment.

Having considered the options available, the Institute agreed that the best approach for apprentices would be to allow assessments to continue in a modified form wherever feasible and set out to deliver this at pace and in a way that maintained quality. The Institute set out a framework for what temporary modifications would be allowed, then worked with EQA providers, EPAOs and employers to rapidly agree flexible approaches that could be used to assess apprentices using the existing assessment methods (for example remotely recording workplace observations), or where that was not possible, replacing the existing assessment methods with ones which were feasible (for example replacing observations with professional discussions delivered virtually), or drew more heavily on on-programme activity (for example using portfolios or witness testimonies).

This work and the Institute's monitoring of its effectiveness is described in detail in the final chapter of this report. It is testament to the hard work, flexibility and commitment to supporting apprentices, shown by employers, EQA providers and EPAOs, and the diligence and determination of the apprentices themselves, that thousands of apprentices have been able to undertake end-point assessment since the start of the COVID-19 outbreak, with monthly volumes of assessment now similar to levels before the pandemic.

While this presents a relatively positive picture of the current EQA system, the last 12 months has also revealed challenges with the current approach. Firstly, it is a complicated system with a number of EPAOs working with more than one EQA provider and, in a small number of cases, working with as many as seven EQA providers across different apprenticeship standards. Secondly, most EQA providers do not have the regulatory levers at their disposal to enforce change or apply sanctions where end-point assessment delivery is inadequate. Some EQA providers report challenges getting EPAOs to provide information requested or to make changes to their delivery, and EPAOs have commented that they take more seriously the requirements of and requests for information from Ofqual than other EQA providers because they come with additional regulatory heft. Finally, the system of funding EQA, for most EQA providers, through the levying of a per-apprentice charge is a suboptimal means of funding the system and inconsistency between different charges, albeit that they represent genuinely differing costs, has been widely resented by EPAOs.

For these reasons, we consulted earlier this year on a proposal to move to a simplified and strengthened model of EQA whereby the majority of EQA would be undertaken by Ofqual, with EQA for integrated degree apprenticeships being undertaken by the Office for Students (OfS). Following responses to the consultation we are currently transitioning to this approach with standards currently subject to EQA by the Institute scheduled to transfer to Ofqual by the end of July 2021, and the remaining standards by summer 2022.

EQA activity over the past year, and indeed the views expressed in response to the consultation, highlight the importance of occupational expertise in quality assuring end-point assessment to ensure that it remains as occupationally relevant and authentic as possible. We are therefore establishing, as part of the transition to the new system, a directory of employer bodies which will support Ofqual and the OfS in their delivery of EQA.

End-point assessment is still new. It has grown significantly over the last three years – in April 2017 (the Institute’s first month of existence) only a handful of end-point assessments took place, that figure is now in the thousands per month. That is a significant number. But it is still much smaller than the number of apprentices that will take end-point assessment over the next few years. It is therefore an opportune moment for all with an interest in the delivery of high-quality end-point assessment to understand what is currently working well and what can be improved. I hope that the findings in this report will be an important contribution to that discussion.

Jennifer Coupland

Chief executive



Executive summary

Over the last year, EQA providers have undertaken a range of EQA activity, delivered in-line with the Institute's EQA Framework. EQA activity has provided a rich level of insight into how end-point assessment is being delivered across apprenticeship standards and how well it is meeting our expectations as set out in the EQA Framework, the Conditions of the Register of End-Point Assessment Organisations (RoEPAO) and the relevant assessment plan.

Summary of EQA findings

From EQA activity that has been undertaken over the past year, a number of key findings have emerged. These are set out in the table below, along with how the Institute and other bodies within the end-point assessment and EQA landscape intend to take action to support end-point assessment delivery to continue to improve.

End-point assessment is still a very new form of assessment, compared to many professional, academic and vocational qualifications which have existed for decades or, in the case of some higher education courses, centuries. It is important to understand the areas of good practice and less good practice highlighted in this report in that context.

It is important to reiterate that all of the EQA activity undertaken so far suggests that the vast majority of end-point assessment is operating effectively and providing robust and reliable assessment of occupational competence. In general, employers and apprentices who have experienced it value end-point assessment. We know that there is more to do both to ensure that apprentices who have yet to take end-point assessment understand what to expect from it and that all employers and apprentices value end-point assessment and see the value in taking it.

Good end-point assessment is grounded in the published assessment plan and the current practices of the industry involved. It is characterised by the fusion of occupational and assessment expertise; robust internal quality assurance, that is suited to the unique characteristics of end-point assessment; and a customer-focused approach that seeks to meet the needs of employers.

Less good end-point assessment tends to be delivered by organisations which lack either, or both, the assessment or occupational expertise possessed by the very best EPAOs. It is characterised by failure to follow assessment plans and/or additional guidance provided by EQA providers; weak management and internal quality assurance approaches, or those that have been copied from other settings without considering the specific circumstances of end-point assessment; and a lack of sufficient regard for the needs and preparation of the apprentice.

There have been a small number of incidents where the end-point assessment plan or conditions of the RoEPAO have not been complied with and where the independence or validity of assessment has been compromised as a result. Quality assurance and regulatory regimes are put in place to identify and intervene in cases of poor practice and these kinds of incidents are clearly unacceptable, so we have acted swiftly to mitigate these issues when they have been flagged through EQA.

There have been no instances on the standards for which Ofqual currently provide EQA where they have taken enforcement action in the past year. Similarly, there have been no instances where the Institute has invoked its powers under Section A2C of the Apprenticeships, Skills, Children and Learning Act 2009.

The EQA regime has lacked the regulatory powers to drive compliance where EPAOs are unwilling to make changes voluntarily. As noted above, most EPAOs have been keen to work with EQA providers and the Institute to resolve issues. However, in a small number of cases organisations have refused to comply with requests from EQA providers which do not have the regulatory powers to enforce compliance. We have already begun the process of transitioning EQA delivery solely to organisations that have the regulatory powers to enforce action and believe this will strengthen EPAO compliance.

Headline finding	Detail	What is being done about this finding	Organisation(s)
<p>EPAOs that have developed real occupational expertise bring huge added value to the assessment; whereas those that have not can undermine the quality of assessment.</p>	<p>Good end-point assessment is delivered by organisations that can effectively blend strong occupational expertise with robust understanding of good practice in assessment design and delivery.</p>	<p>Occupational and assessment expertise will remain crucial to end-point assessment delivery and will continue to be monitored by ESFA and Ofqual as part of the process of registration and recognition to deliver.</p> <p>Occupational competence and employer expertise will also remain essential to EQA activity. The Institute is establishing an employer directory which will support Ofqual and OfS in their delivery of EQA.</p>	<p>EQA providers including Ofqual and OfS</p> <p>The Institute</p> <p>ESFA</p>
<p>Where EPAOs have developed inadequate assessment materials this is generally picked up through the readiness checks and evaluation of materials by EQA providers.</p> <p>But less good end-point assessment practices are often only exposed once assessment delivery is under way.</p>	<p>Upfront approval and readiness checks have been important for establishing intent and to identify and correct upfront issues which may compromise delivery.</p> <p>But robust readiness activity does not remove the need for EQA providers to inspect and monitor how an EPAO's intent has been delivered in reality.</p>	<p>Readiness checks and technical reviews of assessment materials will remain a crucial aspect of EQA and we believe that the future EQA system will be well-placed to deliver this.</p> <p>Ongoing monitoring of actual delivery will remain central to our EQA approach moving forwards, which will continue to follow the Institute's EQA Framework.</p>	<p>EQA providers including Ofqual and OfS</p>
<p>Version control of assessment plans is not always clearly understood or communicated.</p>	<p>Some lack of clarity around processes where new versions of assessment plans are approved has created a grey area in which some EPAOs have inadvertently or deliberately used older, less relevant assessment plans</p>	<p>Over the next year we will work with our partners and stakeholders to strengthen version control of standards and assessment plans to ensure that apprentices are assessed against the correct plan and EPAOs do not use obsolete plans.</p>	<p>ESFA</p> <p>The Institute</p>

Headline finding	Detail	What is being done about this finding	Organisation(s)
Some older end-point assessment plans could provide greater detail and clarity to allow EPAOs to develop high quality, authentic and consistent end-point assessment.	EQA providers have worked with EPAOs to provide clarity and interpretation of unclear assessment plans, and in some cases the Institute has approved a time-limited dispensation to the plan.	The Institute is taking this forward through a process of revisions, and also through route reviews. These processes allow us the opportunity to work with employers, EPAOs and EQA providers to bring all end-point assessment plans up to the standard of the very best.	The Institute
Grading, in the specific context of an assessment of occupational competence defined by employers, is not well understood by all trailblazers and EPAOs and needs to improve.	There is a risk that grading is applied inconsistently or unfairly. Development of robust assessment materials, assessor training and internal quality assurance by EPAOs will help to mitigate this, as well as strengthening the stock of extant assessment plans	<p>The Institute has strengthened the development of grading content in assessment plans. EQA providers continue to monitor the development and delivery of end-point assessment in regard to grading.</p> <p>EQA providers have provided and continue to provide support and challenge to EPAOs in developing and testing their assessment materials and internal quality assurance processes. EQA delivery also allows us to monitor how grades are distributed within and across standards and EPAOs.</p>	<p>The Institute</p> <p>EQA providers</p>
Most EQA providers report that reasonable adjustments work well. However, reasonable adjustments are not uniformly understood by EPAOs and this needs to improve.	<p>Not all EPAOs have strong reasonable adjustment processes in place and this is an area that is often identified as a shortcoming in readiness checks. EQA providers have then provided support to EPAOs, and most believe that delivery is well-managed and fair.</p> <p>The incidence of reasonable adjustments in end-point assessment appears relatively low.</p>	<p>The Institute has produced guidance on the implementation of reasonable adjustments in apprenticeships.</p> <p>EQA providers continue to provide support and guidance to EPAOs where this is identified as a problem at readiness check stage.</p>	<p>The Institute</p> <p>EQA providers</p>

Headline finding	Detail	What is being done about this finding	Organisation(s)
<p>The degree to which apprentices have been prepared for end-point assessment and know what to expect is too variable.</p>	<p>Some apprentices are well prepared for their assessment by training provider, employer and EPAO. They have been signed off as competent by their employer following a robust gateway check and understand what to expect from the assessment and how to perform in it.</p> <p>Others have had little preparation and, in some cases, there is little evidence that their employers have engaged in a meaningful gateway process.</p>	<p>The Institute is working on a series of easy-to-use guides to demystify different assessment methods and assessment plans, and help apprentices feel more prepared for their assessment. We are also supporting the ESFA's work to improve the prestige of end-point assessment.</p>	<p>The Institute</p> <p>ESFA</p>
<p>The best EPAOs see themselves as learning organisations and have strong internal quality assurance processes and practices.</p>	<p>EPAOs that seek to learn from their delivery and from feedback from customers including apprentices have generally performed well.</p> <p>Internal quality assurance processes are variable with some very strong and very weak practice. Not all EPAOs have adapted fully to the delivery model of end-point assessment</p>	<p>EQA providers have undertaken a range of activities to support EPA delivery on specific standards and across groups of standards, bringing EPAOs together in sector-based forums. We expect this to continue to be an important facet of EQA delivery</p>	<p>EQA providers</p>

System-level changes

Aside from providing insight into the delivery of individual assessment plans and individual EPAOs, EQA has also provided important feedback on the overall functioning of the end-point assessment system. This has prompted two significant changes which will strengthen apprenticeship end-point assessment.

Firstly, it is clear that in a number of instances where the end-point assessment is linked to the requirements of a statutory regulator with oversight of the occupation, the EQA provider is not well placed to influence EPAOs to comply with actions or requests. Furthermore, there is a clear risk that apprentices are over-assessed where they are required to complete both the assessment requirements of the statutory regulator and the end-point assessment. We have recently announced our intention to explore a move to a system where in certain cases the end-point assessment can be aligned with the assessment carried out by the statutory regulator of the occupation. More detail can be found here: [Institute for Apprenticeships and Technical Education / EPA integration in regulated apprenticeship standards /](#)

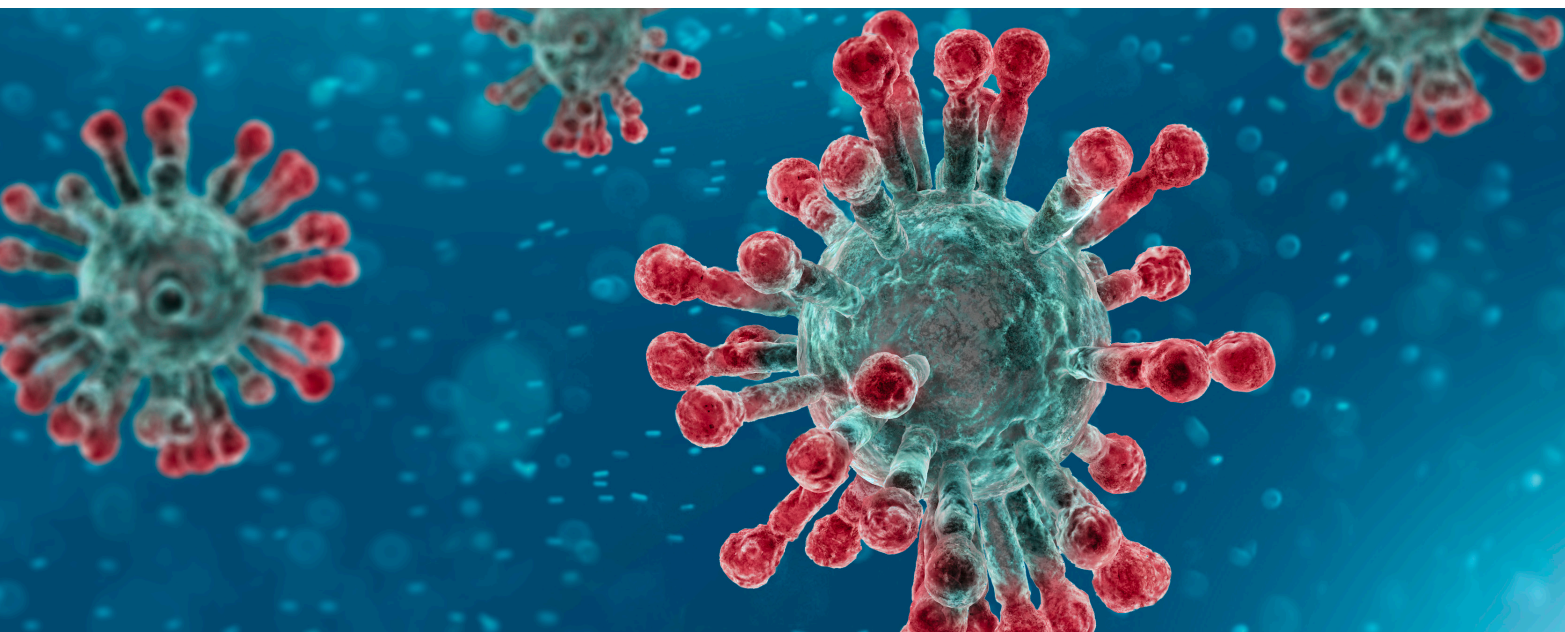
Secondly, the majority of EQA providers lack the regulatory powers to enforce changes from EPAOs. This has meant that a number of EPAOs have refused to make changes requested by EQA providers, either in a timely manner or in some cases at all, which allows unsatisfactory end-point assessment practices to continue. This is one of the reasons we are moving to a new EQA regime where all EQA will be carried out only by Ofqual or, for integrated degree apprenticeships, the Office for Students both of which have regulatory powers. Further information on the proposed transition to a new model of EQA can be found here: [Institute for Apprenticeships and Technical Education / External quality assurance transition /](#)

COVID-19 and end-point assessment

For much of the period covered by this report, the situation facing EPAOs and EQA providers has been highly unusual as a result of the global COVID-19 pandemic and ensuing restrictions. As with all aspects of life, end-point assessment has had to adapt to these circumstances.

Working very closely with EQA providers we have, over the course of 2020, approved a range of ways in which end-point assessments can be delivered flexibly to allow apprentices to complete their apprenticeships in a timely manner and progress in their careers. This has included empowering EQA providers to approve ways in which the existing assessments can be delivered flexibly (for example, allowing remote delivery of an observation or professional discussion if not already explicitly permitted in the assessment plan). Where more major changes are required, including the replacement of an assessment by an alternative method, the Institute has convened taskforces comprising EQA providers, EPAOs, Institute officials and representatives of the trailblazer group. These more significant changes have been approved by the Institute, rather than by EQA providers.

EQA providers have worked with great agility and fleetness of foot to support their sectors in this work, and this approach has been welcomed by EPAOs. The approach we have taken to allowing end-point assessments to be delivered flexibly, and how we continue to monitor this in delivery, is set out in an annex to this document.



What EQA is and how it is delivered

End-point assessment is still a relatively new feature within the English apprenticeship system. Introduced as part of wide-ranging reforms to apprenticeship delivery following the Richard Review it is designed to provide an independent and holistic assessment that an apprentice is competent across the breadth of their occupation at the end of their apprenticeship.

EQA is the process of evaluating the quality of end-point assessment – to ensure that it is delivering a high quality, relevant and reliable assessment, and that this is consistent between different EPAOs on the same apprenticeship standard.



EQA providers

The Institute for Apprenticeships and Technical Education (the Institute) has a statutory duty to ensure that arrangements are in place for this to happen across all apprenticeship standards. The legislation also states that the Institute can either deliver EQA itself or approve or make arrangements for other organisations to do so. The Strategic Guidance issued to the Institute by the Secretary of State for Education in 2017-18 indicated that the organisation which could deliver EQA for a particular standard should be nominated by the relevant trailblazer group and that the bodies other than the Institute which could deliver EQA were Ofqual, the Office for Students (for integrated degree apprenticeships), a professional body or an employer-led body.

Over the last three years the Institute's Quality Assurance Committee – a board-level committee comprised of board members and external experts – has approved 20 organisations in these latter two categories.¹ These bodies have therefore been delivering EQA on a range of standards alongside Ofqual, the Office for Students and the Institute's subcontracted EQA provider, Open Awards. The standards overseen by each current EQA provider are listed on the Institute's website.

Different EQA providers have very different roles within their sector and thus very different scales and types of operation within EQA. Some provide EQA for a single standard, in some cases in an industry in which they have a statutory or licencing role. Others provide EQA across a sector, or group of related sectors. The Institute and Ofqual both provide a general EQA service that is used across a wide range of industries.

And different EQA providers have overseen very differently sized portions of the end-point assessment market. The four largest EQA providers (the Institute, Ofqual, NSAR and People 1st International) have between them provided EQA for the standards on which 93% of apprentice starts were recorded in 2018/19.

The findings in this report draw on the activities of all active EQA providers.

¹ Five of these organisations have subsequently exited EQA delivery

The EQA Framework

In order to ensure a common approach to EQA across these different providers the Institute published a framework for EQA in June 2019. This framework is built around five principles:

- Relevant: end-point assessment is assessing apprentices on content that is relevant to the current practices of the occupation, and that this assessment is undertaken using situations, equipment, software and scenarios that are authentic and current.
- Reliable: end-point assessment is carried out consistently across different EPAOs, time and cohorts; and employers and apprentices can have confidence that the same performance will result in the same outcome.
- Efficient: end-point assessment is a well administered and customer-centric process that is easy for all parties to engage with.
- Positive: end-point assessment is trusted and respected by employers, apprentices and providers to deliver the right outcomes. The experience is open, transparent and accessible.
- Learning: end-point assessment practices are built around continuous improvement including robust internal quality assurance systems.

EQA activity has tested that the design and delivery of end-point assessment is meeting these five principles across all standards and across all EPAOs.

This activity has generated three types of report:

- Standard reports – setting out findings across a standard and making recommendations to the Institute on any changes that should be made to the assessment plan
- EPAO reports – setting out the strengths and areas for improvement of individual EPAOs' delivery of specific standards
- Readiness reports – providing a view on the readiness to deliver end-point assessment of newly approved EPAOs prior to their first delivery on a standard

Details on the areas covered by each type of report can be found in the EQA Framework.

These reports are uploaded by EQA providers onto Qualitas, the Institute's digital interface with EQA providers, and findings shared with the Institute's Quality Assurance Committee. This allows us to understand end-point assessment delivery across the sector as well as to understand how different end-point assessment plans are working in delivery and consider any changes that need to be made to strengthen those plans through our ongoing process of reviews. More importantly the reports on individual EPAOs are shared with those EPAOs to inform their continuous improvement activity.

EQA providers also provide a mechanism for EPAOs and others to raise any issues. For example, Ofqual, People 1st and NSAR have systems for users to report any problems or incidents, and these incident reports can then be analysed and are often quickly resolved. Solutions are fed back to individual EPAOs or to all EPAOs across a particular standard where relevant.

Many EQA providers hold regular EPAO forums where organisations can share concerns and discuss issues in a wider context. Although EPAOs are in competition with each other there is evidence that these events are extremely useful in promoting consistency and sharing good practice. They have helped to develop a sense of community amongst assessment organisations. Responses to the consultation on EQA reform included many positive comments from EPAOs about the support they had received from their EQA providers during the process of EQA.

EQA findings

EQA activity provides the Institute with a unique insight into the operation of end-point assessment. In line with the Institute's framework, a range of EQA providers have undertaken readiness checks on EPAOs, reviewed assessment materials prior to delivery, observed assessments taking place, and undertaken a range of activities to work with and support EPAOs to improve their delivery.

This means that, for the majority of apprenticeship standards with live end-point assessment taking place, we have received reports on the strengths and areas for improvement of both the published assessment plans and the active EPAOs.

Perhaps more importantly, EPAOs have received readiness and EPAO reports detailing their relative strengths in delivery and areas in which they can develop further.

Findings from readiness activity

Since the EQA Framework was introduced, EQA providers have been required to undertake readiness checks of EPAOs once they are approved on the Register of End-Point Assessment Organisations, but before they deliver end-point assessment. This has found a number of EPAOs which are not ready to deliver assessments, often because their assessment materials are inadequate or they have not made appropriate arrangements for, for example, reasonable adjustments. In a small number of cases organisations approved to deliver end-point assessment have been wholly unfit for the task – these incidents have been taken up with the ESFA, who can then manage them as part of their ongoing management of the Register of EPAOs.

EPAOs are often under the impression that acceptance onto the register means they have proved themselves ready to deliver against a particular standard, and do not require any further assessment of readiness. A number of EQA providers report that this is a problem and that readiness, and the need for the EQA providers to complete a readiness check before the EPAO commences delivery, is essential but has not been clearly communicated to EPAOs. This has often led to the need for readiness checks to be completed at short notice which has caused problems for the EQA provider and EPAO, and given insufficient time for improvements to be put in place if any issues are identified. To mitigate this problem some EQA providers have processes in place to identify new EPAOs and make early contact with them so that readiness can be planned in advance.

An area for improvement identified across several EPAOs was testing of assessment instruments. Leading on from this there is often a reluctance from the EPAO to commit resource to prepare for an end-point assessment by developing all the necessary assessment materials upfront. For example, where a bank of tasks is required, the EPAO will develop one task to get started and then look at developing further tasks as they go on which is not in the spirit of the assessment plan requirements.

Relatedly, it is also apparent through monitoring and sampling activities that EPAOs approved to deliver standards with specialisms have in some cases focussed on developing the assessments for only the 'popular' specialisms and have not committed the time or money to developing assessments for all the specialisms within the standard unless they have guarantees of bookings (resulting in the EPAOs potentially having to develop assessments at short notice – which has a knock-on risk to quality and lack of opportunity to pilot assessments before they are used on apprentices).

Generally, evidence presented by EPAOs for the supporting materials section of the readiness check tends to be less strong. These checks are essential to ensuring high quality delivery and to ensuring that EPAOs are given timely action plans to ensure they are ready to deliver and thus that apprentices are protected.

Findings from end-point assessment delivery

The majority of active EPAOs appear to be developing and delivering good end-point assessments, which follow and build on the published assessment plan, and provide an independent, reliable and occupationally relevant assessment of the apprentice.

Good end-point assessment is generally delivered where:

- An EPAO enlists the services of industry experts, credible assessors and independent advisors to devise high-quality assessment tools and commission services for continual development of relevant and up to date assessment materials. Where this includes assessment expertise, the standard of end-point assessment is markedly higher.
- An EPAO fully understands the importance of internal quality assurance and has excellent quality improvement cycles in place. This is extended where the EPAO has an open mind to seeking the advice and guidance of the EQA provider and considers stakeholder feedback proactively.
- An EPAO has designed specific information for each of its stakeholders and has a customer-centric approach ensuring the apprentice is at the heart of the process. Here time is taken to develop resources that speak to each audience group. Time is taken to ensure the apprentice fully understands the process and has access to resources and online platforms to assist in their queries or concerns, including via training providers. Assessment preparation materials are high quality and mirror the format the apprentice will encounter during their live end-point assessment.

Conversely, it is unsurprising given the relative novelty of end-point assessment in apprenticeships that EQA activity has also identified a number of weakness in delivery. This has allowed EPAOs, the Institute and ESFA to take action to improve delivery. Identifying and correcting problems in delivery is also an indication that the EQA approach is working: this is what the system is supposed to do. In general terms, inadequate ratings in EQA reports at the monitoring stage, are often a result of weak management systems and internal quality assurance approaches; methodologies being applied by EPAOs from the delivery of other forms of assessment; EPAOs not following the requirements of the assessment plan or subsequent guidance from EQA providers; and lack of clarity for assessors or apprentices around assessment. These are all areas where we expect to see improvements over the coming year.

We have also seen a very small number of egregious incidents of malpractice and breaches of the Conditions of the Register of End-Point Assessment Organisations – for example, an EPAO assessing apprentices on a standard that it is not registered to deliver; or another attempting to assess apprentices on an obsolete version of an assessment plan which was no longer relevant to or endorsed by the industry. Malpractice is a risk in all assessments, and the value of EQA for apprenticeships is that these incidents are identified and swiftly corrected.

Where EQA providers have identified poor practice, they have worked with the relevant EPAO(s) to improve delivery. This has involved a variety of means, including bringing EPAOs together in sector or standard-specific forums to discuss issues to drive out this sort of poor practice.

End-point assessment is relatively new and we believe that support from EQA providers has been important in helping EPAOs to correct and improve delivery. In particular, the process of readiness checks and reviews of assessment material prior to delivery has identified problems with EPAOs' plans and development of assessment materials. Action at this stage has prevented problems presenting further on which would compromise the effective delivery of assessment.

There appears to be little or no correlation between good/bad practice and other factors such as type of EPAO, size of EPAO or sector/route of delivery. EQA has identified good practice and poor practice in end-point assessment delivery from large, established awarding organisations and from smaller, more niche organisations that are not regulated by Ofqual. This makes clear the importance of continued vigilance through EQA activity even once the system moves on to a more regulatory footing.

The report will now highlight some key findings from EQA delivery, in each of the five categories of the EQA Framework.

Relevant

Occupational competence

Some EPAOs have drawn on and/or developed for themselves real occupational expertise. RMISC and UKFT both cite the work of EPAOs with strong links to the relevant sector (retail motor and fashion respectively) as a strength of assessment in their sectors. These EPAOs can draw on their own contacts to source assessors and provide sector insights which they have used when developing assessments.

During EQA activity, EQA providers report that good end-point assessment takes place where assessors have demonstrated a high level of occupational expertise and matched the EPAO's assessor job description to the standard and role they are designated to carry out. Most EPAOs have stringent processes in place when recruiting assessors who must have occupational knowledge and recent experience in the sector. The use of experienced and sector specialist assessors has proved to be particularly beneficial to the end-point assessment delivery process. It is usually easier for an EPAO to train and support someone with occupational expertise to assess than for an assessor to gain expertise in a new occupation.

Most EQA providers also have occupational expertise and industry contacts. UKFT has used this to support the development of new standards and to help recruit an EPAO for several of its standards. People 1st International and NSAR both have Quality Boards for each of their sectors which have provided accurate and effective intelligence that supports appropriate lines of enquiry. These Boards include employers who can comment on the relevance of assessments; this is particularly important in fast-moving industries such as digital. These boards have also been useful in helping resolve issues and challenges based on insight and data and have been useful in overseeing the production of insight and performance reports for trailblazer groups tasked with refreshing standards and assessment plans.

Conversely, a small number of EPAOs use assessors with weak occupational credentials that can have the effect of undervaluing the importance of determining competence, especially where there are specialist pathways. Stronger EPAOs recognise the need both to recruit assessors with occupational competence and for end-point assessors to undertake on an ongoing basis meaningful, sector-focused CPD. EPAOs have a key role in ensuring this takes place.

Lack of operational understanding in assessors can undermine the value of the claims made about apprentice competence as a result of end-point assessment and also diminishes the journey that the apprentice has gone on. End-point assessment should be conducted by people capable of understanding and recognising competence (and at the right level), it is the least the apprentice should expect at the end of the process. Occasionally, EPAOs can be defensive about using assessors with broad sector experience as opposed to standard/occupational specific experience, even if the assessment plan requires it.

Version control

All EQA providers shared concerns around training providers and EPAOs delivering the correct version of the assessment plan and ensuring a smooth transition for apprentices to the new end-point assessment. EQA has found some cases where apprentices were being prepared for end-point assessment on obsolete versions of assessment plans or training providers were unaware of fundamental changes, and this is unacceptable.

As part of the process for requesting a Revision, Adjustment and Dispensation review² we have now placed more emphasis on improving our communication channels by notifying EQA providers of pending revisions, improving the look of our website by clearly showing standards in development and made our version log accessible to all.

We have started to work with ESFA on creating a better link between version numbers and LARS codes so training providers are alerted to any assessment plan changes. We are also looking at the best way to communicate changes to training providers.

2 <https://www.instituteforapprenticeships.org/developing-new-apprenticeships/revisions-adjustments-and-dispensations/>

Assessment method-specific findings

In design and delivery, different assessment methods present different challenges. Multiple-choice tests appear extensively as an assessment method, particularly at lower levels. Some EQA providers have voiced concern that their proliferation in early assessment plans to ensure the discrete testing of knowledge, partly to mitigate concerns about the absence of qualifications, was not supported by adequate quality control requirements in those assessment plans. It was also predicated on the assumption that multiple-choice tests were a straightforward, risk-free, and cheap option. In fact, if done properly, the opposite is true. This, along with multiple and new EPAOs entering the market, has created a raft of tests that are not appropriately quality controlled, monitored and evaluated. In many instances, EPAOs are bypassing conventional quality wisdom on multiple-choice test production, for example, undertaking item bank quality control and evaluation using item analysis. This has put huge pressure on quality and comparability.

Equally prevalent as an assessment method, across all levels, is the professional discussion. EQA providers have seen a number of examples of strong practice in this assessment method. Some of this is cited below and pertains to EPAOs taking time to understand the particular context of the apprentice's job and making clear to the apprentice and training provider, the expectations of the assessment method. Conversely, it is also clear that some apprentices, employers and providers have not grasped the significance of the high-stakes professional discussion with some being done in car parks, canteens or local coffee shops. This needs to be seen as a formal, professional assessment intervention where there is a structured discussion with clear assessment objectives. Some of this could perhaps be improved by stronger communication of this from the EPAO to the training provider, and some of it by improved preparation of the apprentice by the training provider.

Reliable

Assessment plans

Several assessment plans, in particular older plans which were approved or developed prior to the establishment of the Institute, do not provide sufficient clarity and detail to enable EPAOs to develop and deliver robust and reliable assessments and grades. This is of particular concern for those standards that have more than one approved EPAO, given the risk that apprentices are assessed inconsistently. In order to address these challenges the Institute has made a number of revisions to assessment plans and will continue to undertake this work in 2021. The disruption of COVID-19 has provided both a challenge and an opportunity in this regard by simultaneously preventing some work on revisions, whilst also making a range of temporary flexibilities and discretions essential. We will be able to learn from the process of developing and approving flexible means of delivering assessment this year in future revisions of assessment plans.

The requirements set out in assessment plans for different methods are important to ensure consistency between different EPAOs delivering the same standard. In some instances, parameters around assessment methods are essential to guide EPAOs towards comparability. For example, setting out how many questions should be used in multiple-choice tests and how long apprentices should have to undertake particular tasks. But other issues are clearly more nuanced, for example requirements around the number of questions that should be asked in a professional discussion or to support an observation. Here, EPAOs will need to understand how these requirements interact with the live nature of the assessment, and therefore the need for and the nature of follow-up questions. Indeed, there will always be limits to the degree of control that can be written into an assessment method such as an observation of an apprentice at work over several hours, or a fluid professional discussion.

In instances where the published assessment plans are insufficient – for example, where they do not clearly describe the parameters of different assessment methods or the final grading aggregation – the EQA Framework, together with supplementary guidance from the Institute, has allowed EQA providers to determine and share the required interpretation of the assessment plan with all the EPAOs involved. Where EQA activity has identified inconsistent practice, this is generally the result of vague, contradictory or missing information within the assessment plan and EPAOs have in most cases been happy to implement the EQA provider's interpretation. These interpretations will then be considered in a revised version of the assessment plan via an Institute revision of the standard. This approach has also informed the approach taken to approve the flexibilities to assessment methods introduced in response to COVID-19.

This approach has broadly mitigated the problems with assessment plans which contain insufficient detail to date, although a very small number of EPAOs have made clear that they will not adopt clarifications to assessment plans until directly instructed to do so by the Institute, otherwise continuing to deliver the assessment plan as published, thereby nullifying the flexibility and speed of change envisaged by the EQA Framework. In these instances the Institute has needed to provide further clarification directly. Nonetheless, the adoption of the EQA Framework continues to provide clear recommendations for improvement that the Institute should make to assessment plans as they come up for review, or sooner where the scale of the recommended improvement means it is unreasonable or inappropriate to wait for the full review.

Grading

Grading is an area that EQA providers highlight as a concern. EPAOs are required to develop their own assessment materials to ensure that the grading criteria set out in the assessment plan are appropriately applied. But there is a risk that in some older assessment plans grading criteria do not provide sufficient detail to guide judgements, but merely repeat the knowledge, skills and behaviours from the standard, or contain contradictory guidance on grading aggregation.

We have strengthened processes around the approval of assessment plans to improve the clarity and robustness of grading. To correct live issues, EQA providers have led standardisation work across EPAOs on older plans where grading criteria are not sufficient: this will feed into longer-term revisions of assessment plans by the Institute.

However, as with all aspects of the assessment plan, having the required level of detail is necessary but not sufficient on its own to ensure consistency. We also need to ensure that, as far as possible, different assessors are making similar judgements when faced with similar performance in order to give apprentices confidence that they are awarded the correct grade.³ This is in large part a question not for assessment plans but for robust assessor guidance and training, standardisation and moderation which is the responsibility of EPAOs.

EQA providers have also looked into how grading profiles actually present. Although this has not been carried out across all sectors, evidence from EQA undertaken by a number of EQA providers suggests that the pass rate is generally consistent between EPAOs on the same standard – although not between standards: where pass-rates can vary between close to 100% and around 70%. However, in some instances there is considerable variability between different EPAOs on the same standard in terms of the proportion of Merit and Distinctions. EQA providers are continuing to interrogate this issue and what it means for comparability and consistency. This is not straightforward. The EPAO which awarded 100+ apprentices on one standard a Distinction grade may have been dealing with an exceptional cohort perhaps where employers and training providers had prepared them for end-point assessment in a particularly robust and helpful way; or they may be interpreting the grading criteria with excessive leniency.

Management of conflicts of interest

EQA providers have observed that conflict of interest is generally managed well across EPAOs, with detailed processes and policies in place. The majority of EPAOs monitor and track the independence of those involved in the end-point assessment, this includes recording of conflict of interests, and CVs in line with confidentiality policies and information and law obligations.

³ Apprenticeships are less exposed to this than general qualifications with most only having two grade boundaries (between Fail and Pass, and Pass and Distinction) or in a small number of cases three where Merit is included as a grade.

Efficient

Where EPAOs performed proficiently in the delivery of end-point assessment, thorough processes were in place for the planning of resources, logistics, security checking, information management and confidentiality.

Open Awards found that EPAOs that were methodical in the management of end-point assessment delivery, took an active part in reviewing and analysing data to determine potential risks and impacts before and during live assessments. Many EQA providers conclude that those EPAOs that generally performed well in this area, maintained a proactive approach to engaging with their customers and had a drive to increase performance.

EQA providers and the ESFA have received a small number of complaints from training providers and employers about poor communication from EPAOs, and difficulties with making contact or raising queries directly with EPAOs. This has caused particular problems where the end-point assessment involves material that the training provider needs to be involved in such as producing a portfolio of evidence. This has been exacerbated in some circumstances where EPAOs have furloughed staff.

Some training providers and employers also raise concerns about the practicalities of booking assessments and receiving results from some EPAOs, with reports of difficult to engage with, or frequently changing, booking systems and bookings being erroneously cancelled and re-let. We would expect such issues to decline as EPAOs become more familiar with the practicalities of delivering assessments directly, and we will explore whether there is scope to raise the scrutiny of this through the recognition process, Conditions of Acceptance or EQA activity. In order to do this, we will seek fuller evidence of the scale of these issues and whether they are particularly prevalent with particular organisations or types of organisation.

Positive

Reasonable adjustments

Readiness checks have allowed EQA providers to support EPAOs in understanding and implementing reasonable adjustment policies and practices. Guidance on reasonable adjustments is available on the Institute's website.

Overall EQA providers report that reasonable adjustments are being operationally delivered and working well. However, reasonable adjustments are not uniformly understood by EPAOs. This has been an area that has presented at readiness check for a number of EQA providers. NSAR for example have found that organisations new to the sector had varying levels of understanding around reasonable adjustments. EQA providers that have made 'not ready to deliver' judgements in this area stated that this was due to no reference to reasonable adjustments in the assessment plans or the EPAOs lack of standard-specific reasonable adjustments.

Anecdotally, uptake of reasonable adjustments appears below the level that might be expected from the overall prevalence of conditions which would necessitate them amongst the general population. This is a topic we will continue to monitor closely and will undertake further investigation, in line with our commitment to discharge our duties under the Equality Act 2010.

We have made great strides over the last 12 months to improve application of reasonable adjustments by strengthening our current policies, ensuring that reasonable adjustments form part of any revisions or published assessment plans. We have provided guidance on the Institute's website and held workshops with trailblazer groups, EQA providers and EPAOs on the importance of accessibility, fairness and highlighted what good looks like.

Preparation of apprentices for end-point assessment

End-point assessment is a high stakes assessment coming at the culmination of years of work for an apprentice. It is vital that they are well-prepared for the assessment, understand what is expected of them and are given the best chance possible to effectively showcase their abilities.

Where EPAOs were marked good or outstanding, Open Awards identified that robust gateway processes were run and guidance made available to apprentices. Apprentices were involved in this process and questioned as to whether they felt ready for the end-point assessment. Furthermore, the apprentice was supported via the provision of mock assessments, which has also been highlighted as a positive attribute in measuring apprentice readiness.

Conversely, both CITB and Open Awards raised particular concerns around the robustness of gateway checks and the engagement of employers. Whilst it is clear in policy that an employer must confirm that they deem an apprentice to be competent and ready for end-point assessment, several EQA providers reported cases where premature recommendations were made, and found several gateway checks absent of an employer's signature. This often resulted in the apprentice failing their end-point assessment or not achieving the grade they were predicted. In some cases, achievement of an NVQ or other on-programme qualification prior to end-point assessment had been taken as sufficient evidence for gateway sign-off of apprentices who have then not been able to demonstrate competence across the whole standard to pass the end-point assessment.

Where there is a professional discussion NSAR report interesting examples of good practice in EPAO and assessor preparation with some EPAOs using the assessor to discuss the end-point assessment requirements with the apprentice and provider, and so meet them before the actual assessment intervention. This way there is a measure of familiarity when the apprentice and assessor next meets. This helps put the apprentice at greater ease making them slightly less nervous and anxious. More importantly, it can allow the assessor to meet the apprentice and understand their work context and employer. This also allows them to become a little better informed and to use this to inform and contextualise the framing of the discussion points in the professional discussion and follow-up questions.

Educating apprentices on the gateway and end-point assessment process has been a key recommendation from the Institute's Apprenticeship Panel, whose recent survey of apprentices found that only 41% of apprentices surveyed were satisfied they understand what will be required of them in their end-point assessment, whilst only 43% are satisfied by the preparation they have received for end-point assessment. We are working alongside our stakeholders including apprentices to improve apprenticeship preparation for end-point assessment.



Learning

EPAOs that view themselves as 'learning organisations', using performance and feedback to refine assessment approaches, are generally stronger. We are aware of encouraging practices that EPAOs and EQA providers are utilising and have imbedded as part of their everyday operations, to allow for improvements within their organisations. Great emphasis has been placed by a number of EPAOs and EQA providers on collating credible data in order to analyse and review performance and take the appropriate actions where required.

EQA providers report a range of strong internal quality assurance practice with lead assessors setting challenging exercises for assessor teams to test the consistency of the assessor teams and target the more challenging criteria to narrow the scope for interpretation. This then leads to action plans being put in place to ensure any issues that emerge as a result are then rectified.

The best EPAOs see themselves as part of a community of shared understanding and work with their EQA provider to instigate discussion across EPAOs that result in additional guidance to add a much needed layer of clarity to standards and occupational briefs. This helps ensure greater consistency across EPAOs. Strong EPAOs also participate in and run training provider forums and consult on end-point assessment improvements with providers, employers and apprentices.

Internal quality assurance in relation to end-point assessment is not uniformly understood or delivered by EPAOs. Many EPAOs believe internal quality assurance is solely about standardisation and the moderation or verification of grades awarded through assessment, not about the whole end-point assessment process. At least one EPAO was found to have very little internal quality assurance evidence available and on further inspection had no staff members with any responsibility for completing internal quality assurance within their organisation and this is unacceptable. EQA providers report that they have seen mixed evidence of internal quality assurance activity when on observation visits and that some EPAOs have expressed a reluctance to observe delivery of assessments in practice.



Next steps

Over 2021 we will continue to build on the findings of this report and work with EQA providers, EPAOs and other stakeholders to improve the delivery of end-point assessment further.

EQA activity has highlighted a number of areas which need to improve in the coming year, alongside the existing programme of EQA audits and reviews which EQA providers will conduct. As highlighted in the report, there is further work to be done to ensure that gradings are applied fairly across apprenticeship standards, that reasonable adjustments are implemented consistently and fairly, as well as aspects of the design and delivery of specific assessment methods like multiple choice questions and professional discussions.

EQA activity over the last year has also highlighted aspects of the delivery of assessment on particular standards or by particular EPAOs which will require closer monitoring over the next 12 months. The more information we have from current and previous EQA activity, the better focused future EQA delivery can be. EPAO reports from EQA activity contain actions and recommendations for improvement which EQA providers will be following up over the course of this year. Within the Institute we will continue to place effort on older assessment plans which are less clear to improve these to the standards of the best assessment plans.

The impact of COVID-19 on end-point assessment will continue to be felt during 2021. This will be true in several ways. Firstly, it is clear some restrictions will need to remain in place for some time. This means the flexibilities and discretions which we have approved will remain in use during at least part of 2021. We have already made clear that no flexibilities will be removed before at least the end of March 2021. It may also be the case that some new flexibilities and discretions are sought.

Secondly, as working practices do begin to return to normal we will need to keep the flexibilities under review. There may be elements of the new approaches used during 2020 which will represent assessment practices and delivery models that are as good, or better than previous approaches. Equally, there may be aspects of the approaches which, whilst appropriate for a relatively short-term to mitigate an acute crisis, are not viable long-term approaches. We will review each flexibility or discretion on its own merits working collaboratively with EQA providers, EPAOs and employers.

Thirdly, there will be medium to longer term impacts for apprentices. When we first introduced flexibilities and discretions in April this year they were primarily designed to allow apprentices who had completed their apprenticeship and in some cases already passed gateway, to complete the assessment. However, there are now apprentices whose training and experience of work has been disrupted by COVID. This presents implications for when and how end-point assessment should be conducted, as well as, how well flexibilities and discretions work (for example those that rely on greater use of on-programme evidence).

The transition of EQA to a simplified and strengthened model where all EQA is delivered by Ofqual or, for integrated degree apprenticeships, the Office for Students will continue during 2021. The transition of standards where the Institute is currently the named EQA provider (where EQA is delivered by Open Awards) began in November 2020, with 68 standards transferred to Ofqual and will continue in 2021. This phase of transition is scheduled to complete by the end of July 2021. From that point until summer 2022 the remaining standards, which currently have EQA provided by a range of employer-led and professional bodies, will transfer to Ofqual.

We intend to produce a report similar to this one in a year's time.

ANNEX: Response to COVID-19

The challenge

It was clear from the outset, that the measures introduced in England in response to the COVID-19 pandemic would have an impact on the feasibility of delivering end-point assessment for a very large number of apprentices. There are a number of reasons for this, including:

Travel restrictions making it difficult for assessors or apprentices to travel to participate in end-point assessments

Social distancing guidelines making assessment methods which involve assessors observing or interviewing apprentices in person, or administering knowledge tests in person, impossible

Measures which individual companies have put in place around access to their sites making assessor access impossible

Some sectors of the economy ceased to operate, or to operate normally, so that some apprentices were furloughed, some were redeployed outside their normal work, and many worked from home

Other areas of the economy (for example, healthcare and logistics) have been on the frontline of responding to the crisis and apprentices could not be released from their work to participate in assessment activities.

Widespread deferral or cancellation of end-point assessment would have had a serious detrimental impact on individual apprentices and we were keen to ensure apprentice progression and enable them to be in a strong position for their careers in spite of the pandemic.

For a number of reasons, the approaches adopted in other qualifications were not suitable to apprenticeship end-point assessment. Firstly, unlike GCSEs or A levels, which tend to act as gateway qualifications, apprenticeships actually confer occupational competence. It is essential, therefore that employers can trust that all those who have completed their apprenticeship have demonstrated the ability to work independently to a national standard. Using predicted or calculated grades, based on performance earlier in the programme would not have provided this assurance. Secondly, end-point assessment tests knowledge, skills and behaviour. Many other qualifications are more heavily knowledge-based and use an examination to sample part of the knowledge domain and extrapolate from that success against the whole domain. Mock exams taken earlier in the programme are therefore a fundamentally similar approach, albeit based on less information. In apprenticeships where we expect apprentices to grow their skills and behaviours over time, there is less validity in basing final grades on mock assessment results or estimates from training providers, especially if the on-programme assessments are different in nature to the final end-point assessment. Thirdly, end-point assessment is a new approach with limited or, on some standards, no data to inform judgements. We did not have confidence that sufficient data existed to take such an approach, nor that training providers and employers would have collected it consistently enough for it to be used fairly. Finally, whereas qualifications like GCSEs and A-levels require the same standards to be maintained over time, across different subjects and between different assessment organisations because the whole cohort will be competing against each other and the previous and following years for college and university places and new entrant jobs, apprentices do not need to compete in the same way. Apprentices are being assessed against what employers deem to be the standard of occupational competence. The challenges and context were thus different, and the approach required was therefore different.

The Institute worked with ESFA to allow apprentices to take a break in learning or pause their assessment, meaning that they had longer to complete the training or the end-point assessment. This has allowed apprentices who are furloughed, redeployed or are working from home to return to complete their apprenticeship once it is safe and practical to do so. There was a risk, however, that for some apprentices who were ready to take their assessment, lockdown would delay this, denying them the opportunity to progress.

In order to mitigate this risk, the Institute has worked with EQA providers and employers, via trailblazers and route panels (groups of employers who respectively develop apprenticeship standards and end-point assessment plans, and provide recommendations for their sign-off within the Institute), as well as EPAOs to permit a range of temporary flexibilities in the way in which end-point assessment is delivered during the coronavirus outbreak.

What we have changed

The end-point assessment plan which the Institute publishes for each apprenticeship standard sets out how the end-point assessment should be conducted by all EPAOs. In order to ensure that these assessments are delivered consistently the end-point assessment plans prescribe a large amount of detail about how the assessment methods must be delivered. In a number of instances, these requirements were preventing end-point assessment being delivered to apprentices during lockdown.

In order to allow end-point assessment to continue, we have allowed two different types of variation to the published assessment plan:

- Flexibilities
- Temporary Discretions

Flexibilities

In the first instance, the Institute provided guidance to allow a range of flexibilities that could be applied quickly following agreement from the EQA provider, as well as changes which EPAOs could make under their own authority such as changing the order of methods within the end-point assessment. Flexibilities preserve the assessment methods in the original end-point assessment plan but allow for them to be delivered in different ways (if not already permitted by the assessment plan): for example, greater use of online assessment, such as delivering a professional discussion using virtual meeting tools; or varying the order in which assessment methods can be delivered. EQA providers have worked with EPAOs to approve these flexibilities while ensuring appropriate safeguards to ensure quality was maintained were in place, such as recording of remote assessments for standardisation, moderation and internal and external quality assurance purposes.

Many apprenticeships include a practical observation where the assessor needs to see the apprentice, for example, interacting with customers or making some kind of product. In some cases e.g. butchery we were able to work with training providers, EPAOs and employers to make sure that a remote observation of an apprentice jointing a cut of lamb would allow the assessor to check the security of the assessment and see sufficient detail to allow a judgment. Flexibilities have been applied to over 80 different standards.

Temporary discretions

For other apprenticeships a more substantial and bespoke solution was needed where, even with flexibilities, the end-point assessment could not be delivered. In some cases, it was simply not possible for the apprentice to demonstrate their skills in a way an external assessor could assess. A change to the end-point assessment itself was required. We refer to these as temporary discretions.

The Institute has set up Taskforces for specific standards bringing together representatives from employers, training providers and EPAOs with the EQA provider and our own assessment and policy experts. Getting all the main stakeholders engaged in a conversation has proved to be an efficient and effective way to provide a thorough understanding of the issue and to raise and debate potential solutions. Risks and issues were discussed and in most cases the Taskforce was able to reach a consensus and propose a solution. Groups worked hard to balance pragmatism with the need to maintain the rigour, quality and esteem of the assessment. Where the proposal entailed a temporary change of assessment method, particular attention was paid to both preserving the integrity and validity of the assessment as far as possible, and the impact on apprentices taking the end-point assessment of a change of method. The collaborative working of EPAOs across a standard, laying aside commercial concerns, for the benefit of apprentices demonstrated the sector's commitment during the pandemic.

Proposals were submitted to the Institute for sign-off by officials in the assessment team, and were considered by representatives of the Institute's employer route panels, to ensure that the proposed assessment met the needs of employers. In the majority of cases proposals have been signed-off.

However, a number have not been signed-off as the Institute and employers felt the proposal would not allow adequate assessment of occupational competence. The purpose was always to allow end-point assessment, but only where it retained its value to employers, to protect their interests and those of apprentices. Temporary discretions have been applied to over 60 standards so far.

All the changes made by the Institute and its partners have enabled thousands of apprentices to complete their assessment during the pandemic.

Maintaining and monitoring quality

It is essential that quality is maintained when end-point assessment is delivered in line with these temporary flexibilities and discretions to ensure that apprentices who are occupationally competent are signed off as being so, and those who have not reached this level are not. In order to ensure this, the Institute has put in place a number of quality checks in the process of allowing flexibilities and discretions to operate.

Sign-off

In the first instance, approval of any change does not sit with the individual EPAO or employer. Instead, for flexibilities, the EQA provider for a standard must agree to any proposal from an EPAO and then communicate this to all EPAOs on the relevant standard. This ensures that the same approach to assessment delivery is applied across the standard rather than different EPAOs applying different flexible approaches to the same assessment. These decisions sit with the EQA provider rather than the Institute as these organisations are closer to the delivery of end-point assessment on the ground, and have a better sense of what will work and what will be appropriate in their sectors. In all cases these EQA providers were working to an overarching framework set by the Institute, and in certain cases sought specific advice and guidance from the Institute. Working through EQA providers has also allowed us to act quickly and more responsively than if we required Institute-level sign-off for all flexibilities.

However, where a more significant change, which would result in the changing of an assessment method, is deemed necessary by EPAOs or employers on a standard, this has required a higher level of scrutiny including by employers. In these instances, the taskforces we have convened have included the trailblazer or appropriate employer representative to ensure the proposal developed has had employer input. The proposal is signed-off by senior officials in the Institute and ultimately by representatives of the Institute's employer route panels to ensure that it meets employer needs.

This division between EQA provider sign-off for more minor delivery flexibilities and Institute sign-off where assessment methods are changing is in line with the Institute's published EQA framework.

Delivery

Responsibility for the delivery of end-point assessment in line with the flexibilities or discretions agreed sits with the EPAO. Where needed, the EQA provider may provide guidance to EPAOs on the design, development and implementation of flexibilities to ensure consistency of interpretation across EPAOs. However, responsibility for developing end-point assessment materials and plans for delivery rests with the EPAO.

EQA providers have also had an important role bringing EPAOs together to review their implementation plans, training of assessors, and training provider and apprentice guidance to ensure individual EPAOs are implementing the flexibilities and discretions robustly and as intended.

EQA providers are undertaking EQA activity on the delivery of end-point assessment which utilises flexibilities or discretions, as part of their normal role. This might involve reviewing footage, output and grades of these assessments with recommendations for improvement made where needed. This may be more intensive than normal EQA activity, for example sampling a higher proportion of assessment activity. EQA of these flexibilities has also involved conversations with individual apprentices to understand their experience and, where necessary, set actions for EPAOs to improve these. We believe this is appropriate given the novelty and potential risks associated with changes to the delivery or nature of assessment methods.

Feedback, evaluation and review

It is important that the end-point assessment system learns from the experience of delivering end-point assessment during this period. To that end, EQA providers are actively monitoring how flexibilities and discretions are being applied and feeding this information back to the Institute, through Qualitas our digital platform, and also to EPAOs to help them develop and improve their end-point assessment delivery.

The Institute also intends to undertake an evaluation with the Federation of Awarding Bodies (FAB) on how FAB's members have developed and delivered assessments in line with the flexibilities. We intend to publish findings from our EQA work and the Institute's work with FAB, in early 2021 setting out how these flexibilities and discretions have been applied by EPAOs and highlighting how potential risks to assessment validity and occupational relevance have been mitigated.

The table below sets out the respective roles and responsibilities of the Institute, EQA providers and EPAOs in approving, delivering and monitoring these flexibilities.

Activity	The Institute	EQA Provider ⁴	EPAO
Overall policy	Sets overall policy on temporary flexibilities and discretions		
Agree flexibilities (for flexibilities only)	<p>Sets the specific flexibilities and determines who may apply them</p> <p>Sets when flexibilities will be withdrawn</p> <p>Sets expectation with EQA providers and supports discussion related to agreeing flexibilities for EPAOs</p> <p>Works with the EQA provider where flexibilities are not suitable and alternative methods need to be considered in a taskforce</p>	<p>The EQA provider approves all flexibilities for EPAOs, ensuring that they are robust and maintain the quality of the apprenticeship</p> <p>Where flexibilities are not suitable the EQA provider works with the EPAO(s) to gather evidence for the taskforce</p>	<p>The EPAO(s) works with the EQA provider to agree flexibilities they will apply</p> <p>Apply flexibilities to their end-point assessment as permitted by their EQA provider</p> <p>Keep records of the changes they have made for future intelligence gathering</p>
Taskforce (for temporary discretions only)	<p>Provide guidance to stakeholders</p> <p>Chairs and facilitates taskforces for individual standards</p> <p>Assesses the information provided by employers and EPAOs and signs-off discretions via employer Route Panels and Institute officials</p>	Participates in taskforce meeting, providing insight and intelligence from previous EQA activity and sector insights	Participates in taskforce meeting, providing insight on assessment delivery and practicality of proposed approach

⁴ The EQA provider for an individual standard can be found on the standard page of the Institute website

Activity	The Institute	EQA Provider ⁴	EPAO
<p>Agree conditions for delivery</p>	<p>Share agreed proposal with EQA provider and stakeholders</p>	<p>The agreed proposal is shared with EPAO(s) detailing agreed flexibilities and next steps</p> <p>The EQA provider arranges an initial meeting with the EPAO(s) to agree an action plan of EQA activities this will include reviewing replaced assessment materials and training plan for apprentice, employers and providers</p> <p>The EQA provider is accountable for checking documentation and material</p> <p>Where needed, the EQA provider may provide guidance to EPAOs on the design, development and implementation of flexibilities/ discretions to ensure consistency of interpretation across EPAOs. However, responsibility for developing end-point assessment materials and plans for delivery rests with the EPAO</p> <p>The EQA provider should record details of all contact with EPAOs on Qualitas</p>	<p>The EPAO works with the EQA provider to ensure documentation and materials are ready for first end-point assessment</p> <p>Updates EQA provider with information about apprentices and end-point assessment dates</p> <p>Keep records for future EQA activity</p>

Activity	The Institute	EQA Provider ⁴	EPAO
Delivery of assessment and EQA monitoring	<p>Provides guidance and materials to support engagement</p> <p>Engages with EQA providers to set up regular meetings to discuss progress, risks and issues against the Apprenticeship Standard(s) and EPAO(s) covered</p> <p>Ensure stakeholders are aware of process</p>	<p>The EQA provider compares EPAOs across the Apprenticeship Standard to ensure reliability of methodology and outcomes and relevance the assessment</p> <p>Develops and implements a rigorous monitoring plan based on end-point assessment data and flexibilities where alternative assessment methods have been applied</p> <p>Develops action plans with EPAO(s) to improve service</p> <p>Maintain an incident log to record and monitor all issues</p> <p>Where serious issues arise, reports this as soon as possible to the Institute along with a recommended course of action</p>	<p>Retains responsibility for the quality of their own end-point assessments</p> <p>Engages with Training Providers to set out expectations and requirements for the flexibility/discretion, set out appropriate end-point assessment dates and ensure apprentices are prepared</p> <p>Escalate incidents to EQA provider</p> <p>Maintain an incident log to record and monitor all issues</p> <p>Take appropriate action where incidents fall within their remit</p>
Feedback	<p>Ensure risks, lessons learnt, and actions are shared with stakeholders including EQA providers and EPAOs and actioned</p> <p>Takes decisions on removal of flexibilities as and when appropriate and communicate these to all parties</p>	<p>The EQA provider will feedback findings to the EPAO(s) and issue actions for areas for improvement</p>	<p>The EPAO will review feedback and action any points raised before next end-point assessment</p>
Uploading findings from monitoring onto Qualitas	<p>Provide support and guidance on live issues as required</p>	<p>Identify any key findings, recommendations and lessons</p>	<p>Co-operate with EQA provider on the EQA monitoring</p>

Next steps and plans for the future

The temporary flexibilities and discretions that we have permitted have allowed assessment to continue during a difficult time. This has been to the benefit of individual apprentices, and of the apprenticeship system as a whole. In due course, when England moves out of lockdown, we will need to ensure that the apprenticeship assessment system is able to return to a more normal way of doing business in an orderly manner, and learning the lessons from how assessment has been delivered over recent months.

We will follow national guidance in doing this and maintain the flexibilities and discretions whilst they remain necessary. We do, however, anticipate that the purpose of temporary changes to end-point assessment will change over the coming months. The original temporary flexibilities and discretions approved from April this year have generally been used to allow apprentices who have reached the end of their apprenticeship to take the assessment. However, we will increasingly need to deal fairly with apprentices who have experienced significant disruption to their off-the-job and, in particular, on-the-job apprenticeship experience.

The changes we have permitted over recent months have prioritised manageability and deliverability in unique circumstances. Where substantive changes have been made these have been signed-off by employer representatives but in much quicker timescales than we would normally require. They have not been through the full consultation and consideration by a wide group of employers that is normally provided by the Institute's trailblazers and route panels and external consultations. Therefore, whilst they have achieved their purpose (of keeping assessments happening), there may be a risk that they have lost the richness, nuance and support/buy-in the original methodologies had.

It may also be true that some of the flexibilities and alternative assessments which have been used during this period provide more efficient and at least as effective assessment of occupational competence than the published assessment plan. In these instances, we would want to explore with trailblazers and others whether the assessment plan should be reviewed and amended more permanently to reflect the ways assessment has been delivered in recent months, whilst still preserving the core principles of apprenticeship end-point assessment.

We will review flexibilities individually, based on their approval dates, and the latest government guidelines, alongside an escalation route for sector actors to request a review of a standard's flexibilities.

The Institute is working to ensure that all flexibilities and temporary discretions, are reviewed in a time appropriate manner. Any plans to revert to the published assessment plans will have a lead in time of 12 weeks to ensure that there are no 'cliff edges' for EPAOs.