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Foreword – Jennifer Coupland

External Quality Assurance (EQA) is crucial, making sure that apprenticeship end-point assessments are high quality – and work for both apprentices and employers.

Throughout 2022 our external quality assurance (EQA) partners have given us invaluable insight into how end-point assessment (EPA) is being delivered across apprenticeships, including on-site visits to confirm integrated degree EPA. This report brings these insights together so that we can all continue to improve where it is needed.

The context has been the continuing emergence and recovery from the impositions of the Covid pandemic. Many of the flexibilities agreed during this period have been kept and are helping end-point assessment organisations (EPAOs) to deliver assessments more efficiently, but with the same quality and rigor.

The process of transitioning to a simplified EQA system, centred on Ofqual and the Office for Students (OfS), has also continued – and, for the most part it is complete. With this behind us, we will be able to further concentrate on outcomes going forward.

Some valued external quality assurance organisations (EQAOs) will also no longer be undertaking EQA. I would like to express our gratitude for the excellent work that they have done in delivering EQA and their support and commitment throughout the transition period. They have played a key role in establishing the credibility of EPA and the wider apprenticeship programme throughout their years of service. We hope many of them will continue to bring the employer voice alive through membership of our directory of professional and employer-led bodies.

The Institute for Apprenticeships and Technical Education (IfATE) would also like to thank all of the external quality assurance organisations and end-point assessment organisations (EPAOs), who worked so hard throughout 2022 to conduct and quality assure EPA. EQA has helped us see where the system is working well and where it can improve. Our EQA partners have shone a light on best practice and highlighted where the risks and issues are.

In 2023 EQA of apprenticeships will continue to evolve and we look forward to working closely with Ofqual and OfS and others to ensure apprentices and employers continue to receive a quality assured and progressive service. I commend the report and the insights it offers.
Executive summary

Throughout 2022, 13 external quality assurance organisations (EQAOs – previously known as EQA Providers - EQAPs) carried out EQA activity and reporting. EQAOs work in accordance with the EQA framework to ensure consistency. We will be revisiting the Framework in 2023 following the completion of the EQA transition process.

As a result of the transition to a simplified EQA system, the majority of EQA activity will now be conducted by Ofqual or the OfS, both of whom have regulatory powers. The Quality Assurance Agency (QAA) have so far delivered EQA on behalf of the OfS across integrated higher and degree apprenticeships. OfS will undertake this directly from 1 April 2023. As of 31 December 2022, 424 of 434 apprenticeships (98%) have now transitioned from alternative EQA providers to Ofqual. IfATE are providing a temporary, free-of-charge, in-house advice, and quality assurance solution for around 10 apprenticeships that have not yet transitioned. This will ensure that EPA can continue, and that quality will be maintained.

A small handful of apprenticeships sit outside the remit of Ofqual or the OfS and are referred to as ‘out-of-scope’. For example, where a statutory regulator for that occupation undertakes their own EQA. The register of EQA organisations contains a list of all the approved EQAOs and the apprenticeships that they monitor. Out of Scope EQAOs operate in accordance with the EQA framework.

The key findings from EQA activity during 2022 are that:

Readiness to undertake Assessments

- 58% (39) of EPAOs that underwent a readiness check for an apprenticeship were initially compliant with readiness requirements. The main points of failure related to ensuring (i) assessment materials were developed for all the options in the apprenticeship and (ii) assessment instruments were tested before assessment delivery. Where EQAOs identified issues in the readiness check, actions were raised against the EPAO to rectify these ahead of EPA delivery.

Assessment Delivery

- 68% (208) of monitoring reports have a positive outcome (good or outstanding). Where issues have been identified, there is often an example of another EPAO doing the same thing well. This provides an opportunity for EQAOs to share good practice across EPAOs at sector forums to raise quality.

- The quality of EQA reports is often good but some are overly generic, compromising opportunities to identify improvements.

- Data sharing by EQAOs needs improvement as it is hampering the ability to make comparisons across both EPAOs and apprenticeships.
• Working relationships between EPAOs and EQAOs have improved and helped to enable better management of queries and EQA activity.

• Identification of reasonable adjustments should happen as early as possible to ensure adjustments are agreed and implemented ahead of the assessments.

• EQA activity is broadly meeting the requirements of the framework and lessons learned are informing improvements to the framework.

Based on these findings, priority areas for improvement have been agreed for 2023. We have also set out IfATE’s EQA priorities for 2023, which reflect the high-level findings as well as wider strategic objectives. These priorities will need to be delivered in conjunction with other stakeholders, including EQAOs.

**Priority areas for improvement in 2023**

• Confirm that EPAOs develop and test assessment instruments and materials for all options of the apprenticeship, including for resits and retakes.

• Increase live observations of EPA in delivery and of standardisation activity to secure evidence based EQA judgements which support fair assessment for all apprentices.

• Ensure EPAO actions are progressed and completed to provide assurance that EPAOs are delivering to the required standard.

• Identify and share good practice across EPAOs and ensure EQA reports are considering lessons learned from the application of flexibilities, as well as recommendations about efficiencies in EPA plans.

• Ensure EQA reports are submitted in a timely manner and in the agreed format to enable direct analysis of the data and improve the focus of reports.

• Incorporate sector and occupation specific expertise in EQA delivery.

**IfATE EQA Priorities for 2023**

1. Continuing to strengthen the employer voice within apprenticeships:
   
   o improve the coverage of the directory of professional and employer-led bodies and review how it can be used efficiently and effectively by EQAOs.

   o increase the degree to which feedback from the directory and employer led bodies informs the evaluation of EPA performance.

2. Delivering the change agenda:
   
   o continue to be bold in our simplification of EQA to realise efficiencies in delivery, working closely with DfE, Ofqual and OfS.
- review the EQA framework to reflect lessons learned and the transition to regulators.

- increase use of data to identify and target risks in EPA development and delivery, including understanding the differences in apprenticeship outcomes between EPAOs.

- work with stakeholders to ensure the continuity of EQA and EPA service.

- monitor the implementation of degree apprenticeship, statutory integration and mandated qualifications policy – and whether EQA arrangements remain effective to support future development of apprenticeships with integrated EPA.

- assist with the migration of degree apprenticeship EQA delivery from QAA to OfS.

- update our guidance on Reasonable Adjustments.

- support ambitions to increase the dissemination and sharing of good practice and develop assessment capacity and capability across the sector, including effective employer engagement.
**Reflections on 2021-2022 Ambitions**

EQA has continued at pace throughout 2022 with areas of focus closely linked to the priorities set out in the 2021 annual report and the lessons learned from Covid flexibilities and discretions. The following section captures the progress we have made against each of the 2021 annual report priorities.

**Priority 1 (2021): Work with Ofqual, EQA providers, the DfE and EPAOs, to ensure the transition process continues as planned and that apprentices are not disadvantaged.**

As of 31 December 2022, 424 of 434 apprenticeship standards (98%) have now transitioned to Ofqual for EQA. To ensure that the needs of employers and apprentices continue to be met and are not disadvantaged during this process, IfATE is providing a temporary, free-of-charge, in-house advice, and quality assurance solution for around 10 apprenticeships that have not yet transitioned. This will ensure that EPA can continue, and that quality will be maintained.

EPAOs have actively engaged with the Ofqual recognition process and IfATE continues to work closely with the Department and Ofqual to ensure potential gaps in EPA coverage are identified, monitored, and managed appropriately. All decision making is collaborative and driven by the fundamental principles of protecting apprentices and meeting employer needs by ensuring there is continuity with EPA delivery.

**Priority 2 (2021): Recruit organisations to the directory of professional and employer-led bodies, achieving more than 60% coverage and embed use by Ofqual and the OfS.**

The directory of professional and employer-led bodies has expanded to include previous EQAOs that have transferred their EQA responsibilities to Ofqual. This provides a valuable resource by ensuring that organisations with occupational expertise and knowledge of apprenticeship EQA are retained within our EQA service.

- For Ofqual the directory has become the default option for sourcing external occupational expertise for the technical evaluation process and has been used to source experts to support field team work too. Experts provide their views on the appropriateness of the assessments in testing the requisite knowledge, skills and behaviours through attendance at meetings, review of documents, reviewing recorded assessment and attending live assessment in person.

- Roll-out to degree apprenticeships has commenced.

The directory of professional and employer-led bodies continues to provide individuals with occupational expertise to support the EQA of apprenticeships. To date, the directory of professional and employer-led bodies has a 38% coverage of apprenticeships that have been approved for delivery. Recruitment has been prioritised for standards where an EQAO has notified IfATE it intends to carry out EQA activity.
and coverage here is 50%. Work is underway to review the criteria for entry to the
directory as this is currently presenting a barrier for some interested organisations and
affecting IfATE’s ability to recruit. As part of this work, IfATE will expand the remit of the
directory to meet the growing demand for occupational expertise across IfATE and the
desire to contribute from organisations currently on the directory of professional and
employer-led bodies and those who would like to join.

**Priority 3 (2021): Review the application of reasonable adjustments by EPAOs to
ensure all apprentices are treated fairly and consistently. This should include a
review of IfATE’s guidance.**

We have undertaken a review of how EPAOs identify and apply reasonable
adjustments, which included engagement with EPAOs and other key internal and
external stakeholders. The results of the review will be reflected in the IfATE
reasonable adjustment guidance which we will update and publish in Spring 2023.

One EQAO has completed a thematic review of all its active EPAOs and how they
apply reasonable adjustments. They have reported the findings of this review to IfATE
including sharing good practice and areas of improvement. This learning around good
practice, and the findings of EQA activity in 2022, will also be incorporated into our
revision of the reasonable adjustment guidance.

EQA activity in 2022 has identified that some older EPA plans make no reference to
reasonable adjustments or special conditions. We are ensuring that these plans are
prioritised within our review process to clearly reference these requirements. It is also
important to note that EPAOs must make reasonable adjustments to ensure
apprentices with disabilities or physical or mental health conditions aren’t substantially
disadvantaged during assessment, even where older EPA plans do not explicitly refer
to this.

**Priority 4 (2021): Confirm that EQA activity is meeting the requirements of the
EQA framework.**

Through our analysis of EQA during 2022 it is evident EQAOs have established a
range of approaches which reflect the requirements of the EQA framework. This has
resulted in a breadth of EQA data across apprenticeships and EPAOs, which form the
basis of this annual report.

QAA, in their role as the designated quality body (DQB) on behalf of OfS, initiated their
EQA for integrated higher and degree apprenticeships in July 2022. To date, they have
delivered EQA on degree apprenticeship providers in construction, digital, engineering
and manufacturing, health and science, legal finance and accounting and protective
services routes.

QAA have announced that they will no longer consent to performing the role of DQB
after 31 March 2023 and will conclude this period of designation, subject to a decision
by the Secretary of State. OfS will undertake EQA of end-point assessments for
integrated higher and degree apprenticeships from 1 April 2023. We will continue to
work with and support QAA and OfS who plan a smooth handover process,
incorporating best practices and lessons learned to shape the OfS approach. The EPAO market has developed significantly since the EQA framework was originally published, therefore we will complete a review to ensure the framework continues to meet expectations and needs. Recommendations will be developed and will underpin the future shape of the EQA service.

**Priority 5 (2021): Significantly reduce the issues associated with the application of grading descriptors within older assessment plans.**

Through stakeholder engagement and EQAO feedback we have identified the need for improved guidance to EPAOs, apprentices and employers regarding grading descriptor development and application. Our website provides guidance on grading which we will continue to update as we learn more about grading descriptor application in delivery through EQA activity. This annual report also explores how grading has been applied by EPAOs in delivery, what is working well and areas for improvement. Older assessment plans continue to be revised and our updated “change” process enables us to make revisions adjustments and dispensations as required. Technical evaluation aims to establish the approach to grading by different EPAOs on a particular apprenticeship. Where this uncovers comparability issues, EQAOs have used field-based teams to convene EPAO forums and workshops, alongside subject matter experts, to agree a consistent approach.

**Dispensations, Covid flexibilities and discretions**

IfATE has been able to revise apprenticeships using EQA intelligence and has also worked closely with EQAOs to process dispensation requests. Collaborating on this process ensures that the need is quantified, and the impact of the dispensation is considered. This work has also enabled IfATE and EQAOs to maintain the flow and standard of EPA delivery by ensuring mitigations are applied to prevent delivery barriers as a temporary fix whilst the EPA plan is revised.

Flexibilities and discretions were originally introduced to mitigate the impact of Covid-19, enable EPA delivery, and ensure apprentices were able to successfully complete and progress wherever possible. As restrictions were removed, IfATE developed a flexibilities framework to enable the retention of certain flexibilities to ensure we built on the innovative practice that has emerged, and supported EPAOs with high quality delivery.

Figure 1 summaries changes made to EPA plans following the end of IfATE’s temporary discretions in response to Covid-19. Of the 43 temporary discretions created, 40 returned to the original assessment plan and 2 had a permanent change applied. One assessment plan received a non-discretion related request and is currently undergoing a revision.
What EQAOs told us:

- EQAOs have indicated that they have welcomed the introduction and availability of the flexibilities framework which enables efficiencies whilst ensuring quality is maintained, employers' original intentions continue to be met, and apprentices are not disadvantaged.

"Benefits and good practice from the Covid-19 ways of working have been taken forward and continue to be used by EPAOs to offer an efficient, effective end-point assessment service to the sectors People 1st work with" – People 1st International.

"Where there were more efficient ways of assessing possible, these seem to have been brought to the fore as a result of the C-19 experience" – NSAR.

"Flexibilities offered by IfATE, i.e., ability to deliver EPA remotely has alleviated any impact on the more active standard" – ECITB.

- Areas for improvement include ensuring the process for approving flexibilities is smooth and that terminology is used consistently to avoid confusion. The change requests guidance addresses these concerns.

"Flexibilities have proven to be a pragmatic and welcome approach, though on occasion getting them through the system has been painful" – NSAR.

"It would be beneficial to see refinement and clarity with regards to consistency and standardisation in the use of terminology contained within the public domain" – People 1st International.
EQA Data 2022

We have analysed all the EQA activity reported in 2022 to establish how well EPA is being delivered, identify good practice and whether improvements are required. We have also considered whether the EQA system is performing as intended and remains fit for the future.

During 2022, 448 reports were submitted to us by 13 EQAOs.

Figure 2 shows how this compares with the activity we reported in our 2021 EQA annual report. For readiness, 136 checks were completed in 2021, with 67 completed in 2022. For monitoring, 218 were completed in 2021, with 307 completed in 2022. For fit for purpose, 33 were completed in 2021, with 74 completed in 2022. An explanation of the purpose of readiness, monitoring and fit for purpose reports, is included later within this section of the annual report.

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<th>Readiness Checks</th>
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EQAOs were also asked to complete a questionnaire to identify lessons learned, good practice, and views on the flexibilities and EQA frameworks. We received questionnaire responses from 8 EQAOs.

Readiness checks

Readiness checks (RC) assess the readiness of newly approved EPAOs and EPAOs that have yet to deliver against an apprenticeship. This check is based on their assessment and supporting materials, delivery plans, assessors, policies and procedures, including internal quality assurance (IQA) arrangements.

Figure 3 shows the outcomes that have been reported across the readiness checks completed in 2022. Of these, 3 were reported as not ready to deliver, 25 ready to deliver with improvements needed, 37 ready to deliver and 2 exceeds expectations.
59% (38) received a positive outcome.

Analysis was conducted on 67 readiness checks which included 24 EPAOs across 68 apprenticeships. Figure 4 shows the number of issues reported within the 2022 readiness checks against IfATE’s assessment principles. Of the 67 checks completed, these identified 1 issue against grading, 2 issues against reasonable adjustments, 2 issues against independence, 13 issues against feasibility and manageability, 14 issues against validity and 19 issues against consistency and reliability. 37 checks found no issues.
With regard to the areas needing improvement:

**Consistency and reliability**: 28% of RC (19) identified an issue with consistency and reliability. Issues identified included EPAOs developing materials only for specific options within an apprenticeship, rather than all of the options. Additionally, some EPAOs had not developed question banks, nor materials for re-sits, as specified within EPA plans.

**Validity**: 21% of RC (14) identified an issue with validity. Concerns were raised around the lack of testing of assessment instruments before assessment delivery. EPAOs should test the materials that they develop to ensure that they work as intended and are appropriate to the occupation and level of the apprenticeship.

**Grading**: 1% of RC (1) identified an issue with grading. In this instance, the EPAO had not developed their materials to cover all grades as specified within the EPA plan.

**Independence**: 3% of RC (2) identified an issue with independence. On occasions, there had been a lack of clarity about ensuring that conflicts of interest are being considered during assessor recruitment. The decision on whether an apprentice has passed their EPA and their final grade must be taken by someone who has no vested interest in this decision or relationship to the apprentice. EPAOs must have robust conflict of interest policies in place.

**Feasibility & manageability**: 19% of RC (13) identified an issue with feasibility and manageability. Some EPAOs were found to be short of the necessary resources to deliver the volume of anticipated EPAs. EQAOs commented on EPAOs not having
enough experienced independent assessors in place or not having sufficient internal quality assurers or effective internal quality assurance policies in place to meet planned demand. Additionally, concerns were raised that some EPAOs did not have sufficient support materials in place that would aid apprentices in their EPA journey.

**Reasonable Adjustments:** 3% of RC (2) identified an issue with reasonable adjustments. In these instances, EQAOs raised concerns that EPAOs were not evidencing how their materials were accessible to all, nor how they would accommodate additional needs within EPA.

**Good practice:** The majority of EPAOs are compliant (59%) with readiness requirements. Where non-compliance was identified, we are assured that the actions and mitigations specified by the EQAOs and implemented by the EPAOs meant that high quality EPA would have been delivered.

Readiness checks highlighted the importance of EPAOs developing high-quality supporting materials, an example being the development of effective materials to support apprentices in producing their EPA portfolio. This is key to successful gateway and ensuring apprentices progress with accurate and timely advice.

**What EQAOs told us / EQAO Questionnaire:**

- There is significant value in EPAOs testing assessment materials sufficiently ahead of readiness checks.

> “An area of good practice has found that EPAOs are testing assessment instruments more before the readiness check, so have been able to provide more accurate assessment drawing/information before going live” – CITB.

- Committing to continuous improvement is vitally important to becoming ready for EPA.

> “All EPAOs we have completed readiness checks for have demonstrated a commitment to continuous improvement and investment, this includes improvement to knowledge banks, upgrade to software applications for the delivery and the equipment delivery of craft EPA such as test rigs and pressure testing equipment, these elements have ensured the delivery of EPA is robust and meets the employers’ requirements for an apprentice that is fit for purpose within their chosen field of engineering” – ECITB

**EPAO standard monitoring**

EPAO standard monitoring reports are an evaluation of an EPAO’s delivery of a specific apprenticeship EPA. Raised by EQAOs, they check the conduct of assessments, identify and tackle issues, review the quality of EPA delivery, and seek to understand any risks posed.

Analysis was conducted on 307 reports which covered 113 EPAOs across 107 apprenticeships. Figure 5 shows the outcomes that have been reported across the monitoring reports completed in 2022. Of these, 5 were reported as inadequate, 20
requires improvement, 202 good and 6 outstanding. 74 had no outcome recorded. We will continue to work with EQAOs in 2023 to ensure reports are consistent across all EQA activity.

The data identified that 2% of monitoring reports were identified as inadequate, 6% as requiring improvement, 66% as good and 2% as outstanding. Of the remaining 24% of reports, despite not recording an overall outcome these did report on identified issues in EPAO delivery, which we have considered within our wider thematic analysis.

Figure 6 shows the number of issues reported within the 2022 monitoring reports against IfATE’s assessment principles. Of the 307 reports completed, 132 identified no issues. Monitoring identified 13 issues against feasibility and manageability, 54 issues against validity, 81 issues against reasonable adjustments, 84 issues against independence, 116 against grading, and 116 issues against consistency and reliability.
Consistency and reliability: 38% of monitoring reports (116) identified an issue with consistency and reliability. Some EPAOs were found to be awarding grades without moderation taking place. In other instances the ratio of apprentice to assessor differed from that stated in the EPA plan and there was a failure to ensure that projects meet the requirements of the brief as set out in the EPA plan. There were also concerns around inconsistent approaches to resits and retakes, whether the gateway process evidenced all the requirements, and disparities between the EPA approach articulated within supporting guidance and the live assessment records.

Validity: 18% of monitoring reports (54) identified an issue with validity. Issues were identified with the appropriateness, quality and level of difficulty of distractor questions in situational judgement tests in some instances. There were also instances where the situational judgement test questions were positioned as pure knowledge, as opposed to the application of that knowledge.

Grading: 38% of monitoring reports (116) identified an issue with grading. Issues were identified with the application of grade capping in accordance with the assessment plan, after resits or retakes.

Feasibility & manageability: 4% of monitoring reports (13) identified an issue with feasibility and manageability. It was found that some EPAOs have no formal systems in place for monitoring pipeline to ensure sufficient independent assessor coverage. There were also concerns around whether there is a process in place to check independent assessors CPD to validate that independent assessor knowledge is current. These findings underpin one of our priorities for 2023, to support sector efforts.
to increase assessment capacity and capability.

**Independence:** 27% of monitoring reports (84) identified an issue with independence. A training provider was found to have marked knowledge tests and there were concerns that an independent assessor was leading an apprentice during an assessment, both of which compromise independence and impartiality. EPAOs need to ensure that clear conflicts of interest policies and procedures are in place and adhered to, robust question banks are developed, and regular standardisation activities are attended by independent assessors as specified by EPA plans.

**Reasonable adjustments:** 26% of monitoring reports (81) identified an issue with reasonable adjustments. It was found that apprentices were being disadvantaged because reasonable adjustments were not being identified sufficiently early in the process to allow appropriate arrangements to be put into place. This should happen as early as possible to ensure adjustments are agreed and implemented ahead of the assessments. There were also instances where reasonable adjustments appeared to be applied with minimal oversight and without supporting evidence.

**Good practice:** good practice included EPAOs providing robust and accurate apprenticeship specific guidance documentation which provides a good resource for apprentices and employers. EPAOs also put processes in place to gather feedback from apprentices and other stakeholders on how the EPA was delivered. EPAOs made good use of this feedback to improve processes to ensure that apprentices and employers receive a positive experience of EPA.

Evidence also suggests that systems governing the booking and management of assessment are effective and that IQA processes in place ensure efficiency and appropriate marking and assessment.

**What EQAOs told us / EQAO Questionnaire:**

- EPAOs have worked to continuously improve EPA delivery resulting in a mature and stable EPA market.

> "There has been a consistent approach from EPAOs to continuously improve service delivery, this evidence has been monitored consistently throughout the year" – ECITB.

> "EPAOs have performed to a very high standard during a challenging and complex period. Organisations have adapted well to the changes presented around the Covid-19 flexibilities, as well as the transition of the External Quality Assurance service" – People 1st International.

**Fit for purpose (end-point assessment delivery)**

Fit for purpose (FFP) reports collate findings of EPA delivery across an apprenticeship, over time, to make recommendations on changes that should be considered to the EPA plan. Within FFP reports, EQAOs grade EPA plans as either green, amber, or red, following the guidance outlined in IfATE’s EQA Manual. We use the gradings and
recommendations to prioritise and inform EPA plan revisions.

74 reports were provided to IfATE. Figure 7 shows the outcomes of the fit for purpose reports. Of these, 2 were rated red, 27 were rated amber and 12 green. 33 had no overall rating reported. We will continue to work with EQAOs in 2023 to ensure reports are consistent.

The rectification of end-point assessment plans falls to IfATE. The recommendations from all FFP reports submitted in 2022 have been fed into our prioritised apprenticeship standard review process, through which early interventions are facilitated for the most critical improvements and all actions are subject to the oversight that their severity warrants. Our website has the status of current revisions and adjustments to assessment plans.

We noted in our thematic review that the majority of the fit for purpose reports were completed through either desk-based activity or a call for evidence to EPAOs, rather than intelligence captured in live delivery. We will be working with EQAOs to increase the impact of field team observations and what employers are feeding back through the directory of professional and employer-led bodies.

Figure 8 shows the number of issues recorded within the 2022 fit for purpose reports against IfATE’s assessment principles. Of the 74 reports completed, they identified 21 issues against feasibility and manageability, 29 against reasonable adjustments, 31 against validity, 36 against independence, 38 issues against consistency and reliability and 51 against grading and 11 identified no issues.
Consistency and reliability: 51% of FFP reports (38) identified a consistency and reliability issue in EPA plans. Shortcomings in the guidance on some assessment plans was found to be unclear or inconsistent, resulting in variation in EPAO interpretation.

Validity: 42% of FFP reports (31) identified a validity issue in EPA plans. Validity issues were raised in relation to specific assessment methods in some apprenticeships. The inadequate duration of some assessments was reported, particularly in relation to presentations and professional discussions. Some concerns were raised around an observation capturing “staged” evidence, rather than naturally occurring demonstrations of competence. Wider ranging concerns were also flagged around over-assessment and some plans requiring apprentices to be assessed against situations they would not normally be exposed to within their roles.

Grading: 69% of FFP reports (51) identified a grading issue with the EPA plan. There were commentaries on grading, but these were all found to be specific to the clarity around grading requirements, where they were deemed to be unclear, vague or ambiguous.

Independence: 49% of FFP reports (36) identified an independence issue with the EPA plan. A concern was expressed about the clarity of EPA plan guidance on how independence and conflicts of interest should be managed. Additionally, concerns were raised about plans that required independent panel members and how these can be challenging to source.
Feasibility & manageability: 28% of FFP reports (21) identified a feasibility and manageability issue with the EPA plan. Some EPA plans have been reported as not being cost effective, specifically where the plan did not accommodate assessments being completed remotely, or where assessments required long time periods to complete. It is important to note that cost effectiveness is a key consideration within our approvals process for EPA plans, but we also understand that this needs to be kept as a point of review thereafter. EQA provides us with valuable intelligence to support these reviews.

Reasonable adjustments: 39% of FFP reports (29) identified a reasonable adjustment issue with the EPA plan. EQAOs have identified some EPA plans where there is no reference to reasonable adjustments or special conditions.

What EQAOs told us / EQAO Questionnaire:

- EQAOs and EPAOs value the opportunity to report issues with the delivery of EPA plans.

"The approach to conducting IfATE fit-for-purpose assessments has enabled EPAOs to communicate barriers and challenges in end-point assessment delivery that are specific to the standards and end-point assessment plans" – People 1st International.
Analysis for continuous improvement

Based on our analysis of EQA activity in 2022, we are reassured that EQA is investigating all aspects of EPA delivery, identifying good practice, areas for improvement and raising actions to resolve issues.

Figure 9 shows the number of actions raised from EQA activity in 2022, as well as the number of those actions that have been completed and those that are incomplete and past due date. There were 333 actions raised during the year, of which 112 have been completed. 188 non-completed actions are past their due date (although 47 of these have had a follow up by the EQAO). This has been impacted by the EQA transition process and we will be working closely with all EQAOs in 2023 to follow up on the 141 remaining non-completed actions with EPAOs and provide assurance that the necessary improvements have been made.

![Actions identified in 2022 reports](chart)

**Figure 9**

Figure 10 compares the actions raised and actions completed in 2021, as documented in our 2021 EQA Annual Report, with the actions raised and actions completed in 2022. In 2021, we reported that 1028 actions had been raised, with 814 completed. This compares to 333 actions raised in 2022, with 112 completed. It is important to note within the 2021 figures (as reported in our 2021 annual report), both actions and recommendations were included. This differs to our 2022 figures, where we have included only the number of actions for comparison. This is because actions provide a clearer indication of where essential improvements are required of EPAOs and must be acted upon, whereas recommendations are only suggestions for further development of their practices. For transparency, there were 116 recommendations reported in 2022, with 11 of those documented as completed by EQAOs.
We see that the lower number of actions identified in 2022 as a good indication that EPAOs are improving their EPA practices and embedding previously provided EQA feedback into their provision. It is possible that additional factors may have impacted on the number of actions identified, such as the reduction in readiness checks as compared to 2021, or the way in which EQAOs are reporting actions within the EQA transition periods. We will monitor the number of actions being raised in 2023, in addition to continuing to ensure EQAOs are following up on previously raised actions.

Overall, EQA has and continues to be delivered according to the framework for the most part, highlighting good practice and identifying and resolving areas for improvement. This intelligence enables us to monitor the robustness of EPA delivery and creates a loop into the system to continuously improve our apprenticeship products and service.