

Driving the quality of apprenticeships in England

Response to the Consultation

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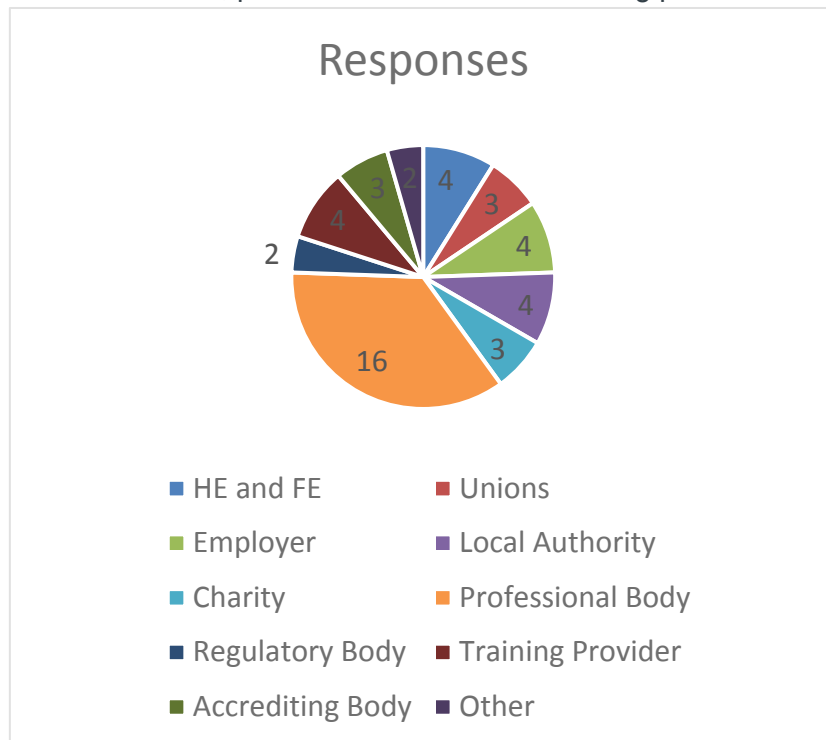
1. Introduction

1.1 The Institute for Apprenticeships (the Institute) published an Operational Plan for consultation on 27 January 2017. The document proposed how the Institute will carry out its functions and improve the apprenticeship system in England. The Operational Plan set out the Institute’s vision, as a new independent public body, to drive up the quality of apprenticeships through an ‘employer-led’ approach. The Institute will build the confidence in and credibility of the quality of apprenticeships within industry and for learners. This document responds to the feedback received by setting out the Institute’s high level policies that will underpin the Institute’s work, including how it will:

- regulate the quality of apprenticeship proposals, standards and assessment plans
- provide advice on apprenticeship funding to the Department for Education
- collaborate with partners
- lead reforms to technical education
- implement the new system

2. Consultation Responses

- 2.1 Respondents were asked to comment on the Operational Plan, and the consultation closed on 27 February 2017.
- 2.2 The Institute’s Operational Plan received a total of 45 responses, from a variety of stakeholders including Higher Education (HE) and Further Education organisations, employers, charities, regulatory bodies, accrediting bodies, Trade Unions, local authorities, professional bodies and training providers.



- 2.3 Respondents identified 5 key areas on which they wanted further clarification:

- A) Governance and decision-making
- B) Approving standards and assessment plans
- C) External Quality Assurance
- D) Integration with Technical Education
- E) Use of metrics

Each will be addressed within our response.

3. Summary of responses and Institute response

A. Governance and decision-making

- 3.1 Overall, respondents were positive and welcomed the more employer-focused approach to developing and ensuring the quality of apprenticeships. However, concerns were raised about ensuring a sufficiently diverse range of perspectives and expertise at every level, including the Board, stakeholder group, Route Panels and peer reviewers. Specifically, for example, there were concerns that Route Panels would be limited in expertise when covering a broad number of sectors which may act as a barrier to Trailblazers coming forward. Within each of the employer elements of the Institute we have or will ensure there is representation from a wide range of sectors so that standards and assessment plans are reviewed fairly.
- 3.2 The Operational Plan sets out the different ways employers will be embedded in the decision-making structure of the Institute, using employers' knowledge of their skills needs and what training and development is required for employees to be productive and progress in their careers. Further information and evidence is set out below.

The Institute's Board

- 3.3 The Institute's Board was appointed on 27 January 2017 with Antony Jenkins confirmed as Chairman. The Board are:
- Dr. Katherine Barclay, Director Academic Liaison, Pfizer UK
 - Sir Gerry Berragan, former Adjunct General and British Army apprentices ambassador
 - Bev Robinson, Principal of Blackpool and Fylde College
 - Paul Cadman, Human Resources Director for Walter Smith Fine Foods Limited
 - Dame Fiona Kendrick, Chair and CEO of Nestle UK and Ireland since 2012
 - Dame Asha Khemka, Principal and Chief Executive of West Nottinghamshire College Group
 - Robin Millar CBE, Chair of Blue Raincoat Chrysalis Group
 - Toby Peyton-Jones, Human Resources Director for Siemens in the UK and North West Europe
- 3.4 The purpose of the Institute's Board is to ensure it discharges its statutory duties as set out in the Enterprise Act. The Board is supported in its function by 4 committees:
- Approval and Funding Committee, which has delegated authority from the Board to make final decisions on whether to approve or reject standards and assessment plans that have been scrutinised by the Route Panels and where the Route Panel has made a preliminary determination. It will also ratify funding band recommendations. It will be comprised of 3 board members.

- Quality Assurance Committee, which reviews whether or not standards or assessment plans remain fit for purpose and whether end point assessments are being operated effectively. It will act as an expert adviser to the Board. This Committee will be chaired by a designated Board member and membership will comprise of 3 independent members with significant expertise in assessment, one additional board member and up to 2 senior Institute staff.
- Audit and Risk Assurance Committee
- Remuneration Committee

3.5 The Board will also engage with other key industry participants through several stakeholder advisory panels and groups which will provide valuable insight. They will not be formal Board committees and will not operate any delegated functions.

- Stakeholder Reference Panel: accesses a broad range of views and expertise on the impact of the Institute's work on quality and take-up. The group is chaired by the Chief Executive, with 2 Board members also attending, to ensure feedback is fed directly into the Institute's strategic decision-making.
- Apprentice Panel: provides an apprentice's perspective to the Board and help ensure that apprentices' views are adequately considered and represented within the Institutes' policy-making process.
- Quality Improvement Group: the 'Quality Alliance' reports on significant concerns that are reported from the External Quality Assurance of end point assessments. The Alliance will be chaired by a designated Board member and report directly to the Board.

Route Panels

- We have appointed the 15 Route Panel chairs covering the occupational routes recommended in the Sainsbury Review. Route Panels are responsible for scrutinising and making preliminary determinations on whether to approve or reject standards and assessment plans. They also provide advice on funding recommendations. The Approval and Funding Committee has delegated authority from the Board to ratify the determinations of the Route Panel.

3.6 For the interim period, until the full panels are in place, each chair will make determinations supported by officials within the Institute. These determinations will be ratified by the Approvals and Funding Committee.

3.7 The recruitment of Route Panel members will be launched in April and the Institute will ensure that Route Panels have the right level of expertise. Each panel will consist of a chair, a deputy chair (chosen to complement the chair's expertise), and between 5 and 12 panel members, depending on the size and complexity of the route. The panels will be made up of a range of experts with a broad knowledge of occupations and training across a particular route and could include academics, employers, professional bodies, sector/trade organisations, and National Colleges or other training providers. Members will be experts in their sectors with a broad knowledge of occupations and will represent a mix of employer size (including SMEs).

Peer Review Register

- 3.8 The Institute is committed to driving up the quality of the standards and assessment plans. Involving independent experts in the review of all submissions to the Institute will play a key role in achieving this.
- 3.9 The Operational Plan proposes that a number of independent, third-party reviewers will support Route Panels by providing expert feedback on standards and assessment plans. The model will follow the established approach, used within academia, for assuring the quality of research proposals and research outputs.
- 3.10 The peer review system will focus on key quality criteria set by the Institute and will reach a judgement on whether the learner will reach full occupational competence by completing the apprenticeship standard. Peer reviewers will come from a range of backgrounds including employers, professional bodies, trade associations and business representative bodies. Individuals with suitable and relevant expertise will be found in industry regulatory bodies, academia, wider government and training and assessment organisations.
- 3.11 The Peer Review Register will be updated on an annual basis to ensure that that we engage with a large number of reviewers and capture a wide range of views. The details and feedback from the Peer Reviewers will remain anonymous. This approach is designed to ensure that the reviewers are able to provide free and frank comments without the fear of being identified by their peers. We intend that this approach will replace consultation on standards and assessment plans on Citizen Space (the government's online consultation platform) which under the previous process resulted in a limited number of comments on standards and assessment plans. We will still continue to use Citizen Space to obtain views on early proposals. In the interim period, whilst the Peer Review Register is being established we will continue to consult via Citizen Space on all proposals, standards and assessment plans for a limited time.

B. Approving standards and assessment plans

3.12 The Operational Plan provides an overview of the key processes underpinning the work of the Institute, such as the approval of standards and assessment plans. The greater flexibility for employers to develop standards was widely applauded, especially a promised shorter end-to-end process and options for including Trailblazer chairs at approvals meetings. However, there were requests for greater clarity particularly on standard development, funding, the appeals process and External Quality Assurance. For example, there were requests for the Institute to make it clearer which standards are in development and to provide more detailed feedback on rejected submissions.

Standards Development

- 3.13 There was a general agreement amongst respondents to the consultation that the central aim of the Institute should be to drive up the quality of apprenticeships and be the guardian of quality for apprenticeship standards and assessment plans. The Institute's Board have reinforced their commitment to driving up quality in standards and assessment plans, recognising this can only be achieved by providing more support to Trailblazers earlier in the development process. This will include an insistence that, prior to submitting proposals to develop new standards, all Trailblazers engage the support of a relationship manager within the Institute. In particular, when proposals, standards and assessment plans are submitted for approval, the Institute will identify those that need additional work before they are reviewed by the Route Panel and provide intensive support to the relevant Trailblazers to address specific issues, in line with the Board's quality expectations. This approach will lead to fewer rejections and will reduce the high level of resubmissions.
- 3.14 The Operational Plan set out the Institute's commitment to increase support to help Trailblazers to get started on developing submissions and how submissions will be approved and reviewed. However, a series of points were made by respondents which pointed to a need for enhanced guidance on the development of standards and occupational profiles to aid Trailblazers in achieving this. There was also concern about the potential development of poor standards, for example, those leaving learners at the end of an apprenticeship without transferable skills.
- 3.15 The Institute recognises that currently standards vary considerably in the way they set out the occupational profile and describe skills, knowledge and behaviours. We therefore intend to add an additional criterion for approval which requires a more substantial occupational profile linked to skills, knowledge and behaviours. We also expect to produce 'good practice' guidance in due course, giving more assistance to Trailblazers on writing standards themselves and deciding on assessment methods.
- 3.16 Further to this, and more broadly, the Institute will adopt a robust statement of what we think quality means and how we can measure progress. We will then consult employers on this and on their wider views. The Institute will also convene a partnership of all of the key players in apprenticeship quality. We hope that this will lead us to producing an overall strategy for the quality of apprenticeships.

Reviewing existing standards and transition from frameworks to standards

- 3.17 The review of existing standards was welcomed, but Trailblazers wanted to have the opportunity to feed into the process of rationalisation before changes are made. As set out in the Operational Plan, there will be ongoing monitoring of existing standards and route-based evaluations. Both will draw on a range of data and user feedback.
- 3.18 Respondents identified some risks in the process of turning off frameworks without replacement standards being in place, leading to negative consequences for apprenticeship targets and opportunities for employment. The Education and Skills Funding Agency (ESFA) are phasing the withdrawal of apprenticeship frameworks over this Parliament as employers take on apprentices on the new standards and ensuring issuing authorities and training providers have reasonable notice to prepare for the changes. They are publicly consulting on each batch of frameworks proposed for withdrawal.

Funding

- 3.19 Respondents requested further detail on the recommended allocation of standards and assessment plans to funding bands, and the challenge process. Respondents argued that funding should be determined by the actual cost of delivery through a transparent process with clear criteria. There was also a request for more clarity on the respective roles of the Institute, ESFA and Department for Education (DfE) in the process.
- 3.20 From 1 April 2017, the Institute will advise the Secretary of State for Education on apprenticeship funding. Specifically, the Institute will make recommendations on which pre-set funding band each new apprenticeship should be allocated to. The Secretary of State will take the final decision on band allocation.
- 3.21 Prior to 1 April, funding band allocations were completed by the ESFA and DfE. There will be a period of transition as the Institute builds its capability and capacity to take on its recommendation work. In the short term, the Institute will run the process but will rely on ESFA to continue to make the cost calculations.
- 3.22 Over time, the Institute will take on a more active role providing funding advice to DfE, and the responses to the consultation will help to inform the development of this work. In response to calls for greater transparency and for funding decisions to be based on cost of delivery, the Institute will require Trailblazers to submit a costing form alongside their standard and/or assessment plan to support the process. In making recommendations, the Institute will have regard to the factors set out in DfE's strategic guidance including affordability, improving quality, securing growth in apprenticeships and improving take up amongst disadvantaged groups.

Appeals Process

- 3.23 There will be an appeals process for Trailblazers wishing to contest a decision of the Institute or their recommended funding band. Appeals will be allowed on the grounds of procedural irregularity such that the legitimacy of the decision is called into question; or that there is material that was in existence and there is a good reason it was not submitted at the time the decision was made that, had it been made available, would have influenced the decision of the Institute.

- 3.24 Appeals will not be accepted based on simple disagreement with a decision the Institute has made. Where a standard or assessment plan has been rejected the respective Trailblazer group will be provided with feedback setting out the reasons for the decision. If a Trailblazer wishes to provide new evidence they believe may have altered the decision, they can re-submit to the next round of approvals.
- 3.25 The Institute will publish its appeals procedure and review it after 6 months of operation.
- 3.26 If you wish to appeal a decision you should contact ifa.enquiries@education.gov.uk with 'Appeal' marked clearly in the subject line.

C. External Quality Assurance

- 3.27 On the whole, robust and consistent External Quality Assurance (EQA) was welcomed. There were concerns, however, on whether there was enough detail on the proposed EQA options to enable employers to fully understand their options. Detail on regulation of poor providers was welcomed, but further detail was requested on the EQA requirements and on how the Institute would work with the ESFA to remove providers from the Register of Apprenticeship Training Providers (RoATP) and how this will be achieved. There was concern to ensure how the proposal that the Institute would offer EQA as last resort option for EQA would operate. Clarification was requested on how the Institute would ensure that its approach would be consistent and similar with other approaches to avoid eroding trust in other EQA approaches. There were also more general concerns raised about how the Institute will ensure consistency and comparability between standards and End Point Assessments.
- 3.28 In response to these queries the Institute will issue a Framework and Guidance for External Quality Assurance. This covers the Institute’s responsibilities, EQA approaches, EQA bodies accountability and improvement, EQA body monitoring and reporting and ESFA monitoring. It can be found at Annex B.
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D. Technical Education

- 3.29 The Operational Plan sets out the role of the Institute in implementing the Post-16 Skills Plan and how the Institute is planning for its expanded remit in April 2018 when it assumes wider responsibility for Technical Education (TE) in England – covering both apprenticeships and college-based TE. There was a mixed reception to wider TE being brought within the remit of the Institute in April 2018. Some respondents welcomed the approach as logical, whilst others highlighted that it could create a divide between technical and academic education with learners finding it difficult to cross boundaries.
- 3.30 Respondents highlighted a number of concerns. Firstly, whether employers would be able to differentiate between apprenticeships and college-based TE. Secondly, there might be confusion over the standard and definition of occupational competence. Thirdly, some thought that the college-based approach would come to be perceived as having more value than apprenticeships. Finally, there was also a desire for more information on the ‘panels of professionals’ being convened to develop standards for college-based TE and advise on the content of new technical qualifications, and worries that they could lead to overlap and confusion with existing Trailblazer groups. There were specific concerns about the issuing of exclusive licenses to develop single qualifications for each route. Respondents thought that this might disincentivise providers entering the market and could create risks for delivery, for example if a provider could not fulfil its duties. Questions were also asked as to how the Institute would manage its relationship with Ofqual as the regulator of qualifications and assessments.
- 3.31 Many of these concerns relate to recommendations made by the Independent Sainsbury Panel on Technical Education, which the government has already accepted and made a commitment to implement. Work is underway to deliver these reforms and prepare for the expected expansion of the Institute in April 2018, and a government consultation planned for early summer will provide further details on how it intends to implement these changes.
- 3.32 The Technical and Further Education Bill continues to progress through Parliament and, subject to the will of Parliament, will bring in the provisions to expand the remit of the Institute to include all technical education. Occupational maps are being developed for each of the 15 routes that will encompass technical education, to ensure that all the relevant occupations in the economy for which it is appropriate to have a standard are covered. These occupational maps will form part of the government’s consultation in early summer 2017, in preparation for handing over responsibility for maintaining these maps to the Institute.
- 3.33 A recruitment for panels of professionals closed in February 2017. These panels of professionals will have responsibility for developing standards for specific technical occupations that form a suitable basis for a college-based course, where there are no existing apprenticeship standards in place. They will also prepare the outline content for new college-based technical qualifications. From April 2018 the Institute’s Route Panels will take on responsibility for approving standards across all technical education, including those standards developed by panels of professionals, and new college-based technical qualifications.

3.34 The government’s forthcoming consultation will set out further detail about the intended process by which organisations can bid to develop a technical qualification for levels 2 and 3, under the proposals to award an exclusive licence for each qualification. The procurement process will begin later in 2017, so that the first qualifications can be developed for first delivery in September 2019. Government continues to develop its policy for implementing the Sainsbury recommendations for technical qualifications at levels 4 and 5.

E. Use of metrics

- 3.35 Respondents commented that there had not yet been an evaluation of the Trailblazer model or the quality of standards produced to ascertain whether the current approach was the right one. The Institute was also challenged to define its aspiration to become ‘world class’. In general, the commitment to better use of data was welcomed, but there were warnings that use needed to be sufficiently sophisticated, for example to highlight regional and sub-regional issues within national trends. There was also suggestion that the plan focused too much on employer and economic gains and should include more on widening participation, ensuring fair access for all and how apprenticeships are contributing to social mobility.
- 3.36 A key priority of the Institute will be using data to guide decision making and when evaluating the quality of the apprenticeship programme. The Institute plans to use granular learner and longitudinal outcome data to analyse spatial and sectoral differences, and to assess whether apprenticeship provision is contributing effectively to the social mobility agenda.

Annex A – Institute criteria for approving proposals, standards and assessment plans

1.1. PROPOSALS TO DEVELOP A STANDARD

All Expressions of Interest related to occupations must meet the following criteria to ensure that the occupation is suitable for the development of an apprenticeship standard:

- The occupation to be covered is a **recognised standalone occupation** for which there is a genuine demand in the job market and full occupational competence can be achieved within the apprenticeship.
- The occupation to be covered is **unique and does not significantly overlap** with occupations covered by any approved standards or standards in development.
- The occupation will require **rigorous and substantial training of at least a year** (or longer if the apprenticeship is undertaken on a part time basis) prior to the end-point assessment to achieve full competence, with **off-the-job training accounting for at least 20%** of the apprenticeship.
- The occupation **has sufficient breadth and depth** to allow the successful apprentice to develop **transferable skills** that will enable them to perform this role in a business of any size in any relevant sector.
- It must be demonstrated how the standard will fit with the **Apprenticeship and Technical Education Routes** system - identifying which of the 15 routes your standard aligns to. Once the relevant occupational map is available the standard should identify which occupation the apprenticeship aligns to.

1.2. STANDARDS

To ensure every standard is high quality there are 8 criteria that all apprenticeship standards must meet:

- **Be short, concise and clear.**
- **Full competence in an occupation** – it sets out the full competence needed in an occupation, so that, on completion, the apprentice is able to carry out the role in any size of employer across any relevant sector.
- **Contains a clear occupational profile** setting out the responsibilities of the occupation and linked to the skills, knowledge and behaviours which will be applied in the workplace.
- **Employer support** – the standard has the support of employers, including smaller businesses. This means that a wide range of employers have been involved in development of the standard, recognise it as fit for purpose and have signed up to it.
- **Stretch** - the standard contains sufficient breadth and depth and is pitched at such a level that a new entrant to the occupation will find it stretching and that it will require at least a year of training (before the end-point assessment) with off-the-job training accounting for at least 20% of the apprenticeship.

- **Professional recognition** - align with professional registration where it exists. Where professional registration exists for the occupation, the apprenticeship standard provides the individual with the knowledge, skills and experience they need to be eligible to apply for this. (At Levels 6 and 7, it might not always be possible for standards to fully align with the requirements for professional registration. Where this is the case, the standard should set out the additional experience that is required before an individual can acquire professional status.)
- **Contain minimum English and maths requirements and any digital skills required.** The standard needs to include details of the English and maths requirements, either at the minimum level set by government for all apprentices, or above the minimum level if required by the Trailblazer; and having regard to the government's commitment to implement measures to improve access for to apprenticeships for people with learning difficulties and disabilities, including any minimum requirements relating to English and maths that the government might set. Current minimum government English and maths requirements are:
 - for level 2 apprenticeships, achieve level 1 English and maths and take the test for level 2 prior to taking their end-point assessment
 - for level 3 to 7 apprenticeships, achieve level 2 English and maths prior to taking their end-point assessment

Only include mandatory qualifications¹ under certain circumstances. As the EPA will provide definitive evidence of whether the apprentice has acquired full competence, qualifications should not generally need to be included within an apprenticeship standard. Qualifications can be included if they are: a) a regulatory/mandatory requirement in the occupational area to which the standard relates; b) required for professional registration; or c) is used as a hard sift when applying for jobs in the occupation related to the standard.

1.3. ASSESSMENT POLICY

To ensure every assessment plan is robust and of high quality, they must meet the following criteria:

- **Deliver valid and accurate judgements** - the methods of assessment must be fit for purpose and appropriate to the content. The assessment methods and tools will need to ensure that the decisions reached on every apprentice are an accurate and valid reflection of their occupational competence.
- **Include a detailed, holistic assessment** - the EPA must be synoptic, which means that it must holistically assess the higher order knowledge, skills and behaviours from across the standard in an integrated way at the end of the programme.
- **Use a range of assessment methods**- assessments will need to ensure that apprentices can demonstrate their ability across the standard. This will require mixed methods of assessment.

¹ The exception is Degree Apprenticeships at Bachelor's and Master's Level where the qualification is an integral element of the apprenticeship

- **Include a grade** - all apprenticeships should be graded (unless an exemption has been granted), and should have at least one level above a pass for each assessment method and for the apprenticeship as a whole.
- **Produce consistent and reliable judgements** - assessment strategy and tools must ensure that employers can have confidence that apprentices assessed in different parts of the country, at different times, by different assessors have been judged in the same way and have therefore reached the same standard of occupational competence.
- **Ensure independent assessment** - it is vital that all apprentices are assessed in a fair and objective manner. This means assessments will either be delivered by an independent third party, or will be delivered in such a way that no individual or organisation who has been involved in delivery can make the sole decision on competence.²
- **Show that affordability has been considered** - the approach should consider how cost effectiveness in assessments will be delivered while still meeting the quality objectives. Trailblazers should ensure that the EPA is financially reasonable and not off-putting to other employers. EPA should therefore cost no more than 20% of the funding band maximum for the apprenticeship.
- **Explain how the assessment is manageable and feasible** - Trailblazers need to set out how the assessment process will be deliverable on the scale required for the number of apprentices.
- **Include professional body recognition (where applicable)** - where a professional body or bodies have recognised the standard, our expectation is that they will also recognise the assessment process, as completion of the apprenticeship should ensure the apprentice is ready to secure professional accreditation.
- **Quality Assurance** - each EPA plan should set out measures for Internal Quality Assurance which each assessment organisation will need to undertake to ensure quality and consistency.

Measures for External Quality Assurance should also be described in the plan (taking account of the Institute's guidance) and should follow one of the following models:

- Ofqual
- Professional Bodies
- Employer-led Model
- Institute for Apprenticeships, as last resort

DEGREE APPRENTICESHIPS AND ASSESSMENT

Employers can specify either an **integrated degree model** for Levels 6 and 7 Bachelor's and Master's Degrees (where the EPA is embedded within the degree) or a **non-integrated degree model** (where the EPA takes place after the degree has been completed). For both of these

² The exception is for integrated degree apprenticeships, where it is permissible for the same HEI to both deliver the training and assessment. The HEI must be on the Register of Apprentice Assessment Organisations (RoAAO) if it wishes to deliver the end-point assessment.

models the degree will be quality assured by prevailing processes for HE operated currently by the Quality Assurance Agency for Higher Education (QAA). For non-integrated degree apprenticeships there will usually be a professional body involved ensuring occupational competence and therefore the EQA model which will apply would normally be the Professional Bodies option above.

Annex B: Framework for External Quality Assurance of End Point Assessment

1. INTRODUCTION

New apprenticeship assessment plans must include a specification for End Point Assessment (EPA) which is a critical feature of reformed apprenticeships. The Richard Review recommended this approach because employers felt that many apprenticeship qualifications lacked credibility and apprentices were successfully achieving without full competence to perform the occupation. Continuous assessment of qualifications was seen to be effective for accrediting each skill in isolation but not for demonstrating rounded and holistic occupational competence. Continuous assessment in the workplace, by visiting assessors, also carried high costs in training provider/college staff time, which could be better used in delivering and supporting training and learning. Therefore EPA became a core feature of each new apprenticeship standard in order to achieve:

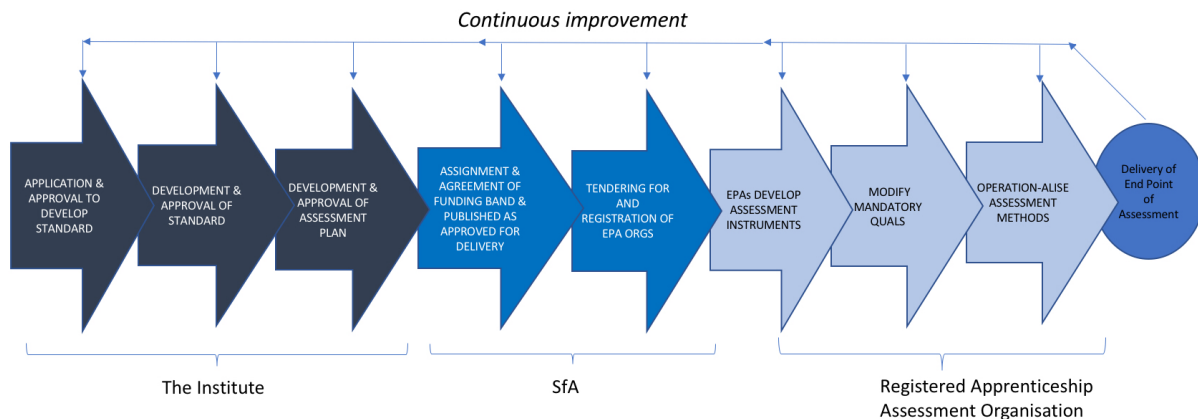
- holistically-competent apprentices more able to apply a range of knowledge, skills and behaviours autonomously in the workplace
- greater credibility for apprenticeships (when combined with other measures, especially setting standards)
- lower costs for assessment with provider staff able to focus on training and learning
- greater involvement of employers in the process

EPA is delivered by apprentice assessment organisations, chosen by each employer from amongst those who have successfully applied to the Education and Skills Funding Agency (ESFA) to be entered onto the Register of Apprentice Assessment Organisations (RoAAO) for each standard. RAAOs in turn develop the assessment instruments and delivery arrangements for each standard based on the specific requirements set out in the relevant assessment plan.

The figure below illustrates the 8 steps of the development process. The first 3 (approval of occupations, standards and assessment plans) are now the responsibility of the Institute. Assigning a funding band and the operation of the Register are the responsibility of the ESFA. The Institute is tasked with providing advice on funding and is responsible for the requirements which are built into the Register. The last 3 steps (developing assessment instruments, mandatory qualifications and the operational arrangements for assessment) are the responsibility of the RAAO. Where there is a mandatory qualification any modification will be the responsibility of the awarding body.

Figure 1

Developing Standards, Assessment Plans & Assessment Instruments



Each of the steps above represents an opportunity to ensure high quality in the resulting apprenticeship. The Institute’s primary mission is to secure quality apprenticeships and will therefore aim to ensure that:

- standards are based on recognised, stand-alone occupations with sufficient skill and breadth to constitute a credible apprenticeship
- standards are written in a way which leads to a clear description of the occupation and the full range of skills, knowledge and behaviours required for occupational competence
- assessment plans are produced which prescribe assessment methods that are fit for purpose (valid), holistic, reliable, deliverable, cost-effective and independent
- EPA is delivered by suitable and independent Registered Apprenticeship Assessment Organisations in full control of assessment delivery and with the capacity and capability to develop and deliver the assessment instruments required
- employers make the choice of assessment organisation and determine the readiness of apprentices for EPA
- assessment instruments developed for EPA produce valid, holistic and reliable assessments of occupational competence as defined by the standard and the assessment plan
- EPA is delivered by independent assessors who are highly competent occupationally and skilled in assessment
- the RAAO effectively and efficiently delivers valid, holistic, reliable, cost-effective, independent and accessible assessments in accordance with the requirements set out in the relevant assessment plan

Quality is about setting the right standards, maintaining an effective approvals process and following through by quality assuring delivery, leading to continuous improvement in all of the

points listed above. The Institute's Framework for EQA is therefore designed to monitor delivery of assessment in order to inform continuous improvement in all of the areas above. We will also carry out formal reviews of each standard every 3 years. RAAOs are required to operate arrangements for Internal Quality Assurance in accordance with the requirements set out in the relevant assessment plan. The Institute will establish an overall system of External Quality Assurance based on its statutory duties and responsibilities.

EPA is not a new concept but its implementation across such a large number and range of occupations is a challenge for all those involved in development and delivery. The Institute is clear that quality comes first in this endeavour and the overall Framework for External Quality Assurance has been designed to establish and continuously improve standards and delivery.

2. THE EQA APPROACHES AND IMPLEMENTATION

The Institute is committed to operating External Quality Assurance via the 4 approaches set out in the Strategic Guidance to the Institute for Apprenticeships. These 4 possible approaches are:

- 1) **Employer-led:** Arrangements here involve an employer-led body and usually include governance set up by the employers often covering a group of standards, although the EQA approach needs to be approved in each individual plan.
- 2) **Professional body:** Also usually including a specific arrangement for governance.
- 3) **Institute for Apprenticeships' EQA Service** which is available where none of the other options are suitable and where a service is needed to step in where an EQA structure for a specific standard has failed or is withdrawn.
- 4) **Ofqual regulation** of awarding bodies acting as RAAOs where EPA will be treated as a qualification: Ofqual regulates awarding bodies whose Internal Quality Assurance (IQA) arrangements are extensive and must comply with Ofqual's requirements. These IQA arrangements involve a similar set of functions to the EQA which will be operated in 1 to 3 above.

Ofqual is also exploring the benefits of entering into partnership arrangements to provide quality assurance, working with the named EQA provider. This might operate under options 1 or 2 above. For Ofqual to undertake this role they would require any assessment organisations delivering EPAs to become Ofqual-recognised. In these circumstances, the Institute will continue to work with the EQA body to deal with and improve quality. Where this is proposed it must be approved by the Institute and should be identified in the assessment plan. Where an assessment plan has already been approved, trailblazer groups should include this in their proposals for EQA when they are submitted under the timetable below.

For integrated Degree Apprenticeships and the degree within non-integrated Degree Apprenticeships, the normal HEFCE and Quality Assurance Agency (QAA) for Higher Education (QAA) processes will apply, although the Department for Education is currently engaging QAA to determine whether it can deliver the EQA for integrated degree apprenticeships. For non-integrated Degree Apprenticeships the end point assessment of occupational competence will usually be overseen by a Professional Body and so comes within approach 2 above.

During the early phases of Trailblazer development there were no specific requirements or options for EQA. From May 2015 Trailblazers were asked to include a statement as to their approach and the Trailblazer guidance of December 2015 then provided for 3 of the options (1, 2 and 4). Later, the Institute option was added as a further option and legislation has been introduced to allow the Institute to charge for this function. In its operational plan, the Institute has said that it only wants to deliver EQA if no other options are suitable. Trailblazers have been required to name the body to deliver EQA and which of the options they have decided upon.

From the point that the Institute takes over, arrangements for EQA are therefore at a variable level of development across standards. Some have made extensive development and have virtually completed the development work and some are still deciding upon their approach. The Institute has therefore developed this framework and guidance to set out its requirements and provide support to Trailblazers and EQA bodies. It is also putting in place an assessment team to work and support EQA bodies.

We intend to ensure implementation of these arrangements over the period to the end of September 2017 as covered in the guidance.

The Institute has a leading role to play in ensuring the quality of apprenticeships and all of the above methods of providing EQA. However, the Institute also offers a direct EQA Service of last resort (3 above) for those trailblazer groups which need it and cannot use one of the other 3 methods. This leaves the Institute with a potential conflict of interest because it oversees all of the approaches to External Quality Assurance but operates one of them itself.

The Institute therefore intends to contract this out and to ensure that all reports of reviews go to the Institute's Assessment Committee for decision. We will also ensure that the contractor reports to a 'neutral' contract management point within the Institute's staff under different line management from the assessment team.

The Institute oversees the 4 approaches to EQA and each EQA body quality assures the processes and assessments of the RAOs for a specific standard. The ESFA operates the Register, which is ultimately owned by the Department for Education.

3. GUIDANCE

New apprenticeship standards vary from those involving many thousands of apprentices and a number of RAOs to those which will involve only a couple of hundred apprentices per year and one RAO only. There is bound to be a large variation in what is Internal versus External Quality Assurance and so a judgement will be required as to where a given quality assurance process best sits.

The EQA process set out by the Trailblazer should aim to provide assurance that:

- **Internal Quality Assurance processes** prescribed in the assessment plan are being carried out, operating effectively and achieving the desired outcomes.
- **Assessors** are fully occupationally competent, up to date, and meet the requirements prescribed in the assessment plan.

- All **requirements** of the standard in terms of achievement of gateways, qualifications and maths and English are achieved prior to sign off by the employer for EPA.
- The Assessment Plan is **valid and cost-effective** in practice. This will include:
 - validity of the assessment methods used to assess occupational competence and perform the occupation in a range of real work settings in employers of any size in any relevant sector
 - coverage of the whole occupation by the assessment methods
 - holistic and synoptic assessment
 - use of a suitable range of assessment methods
- Assessment instruments and assessments are **valid** across a range of real work settings and for employers of any size and in any sector. Assessment methods should be clearly aligned to the application of specific skills, knowledge and behaviours.
- Assessment is carried out as far as is practicable **synoptically** and that this applies to at least one method of assessment of skills and knowledge.
- Assessments are **reliable and comparable** across different RAOs, employers, places, times and assessors.
- Assessment is carried out **independently** in practice. This means that both the organisation and the individual assessors are independent of the delivery of training.
- **Access** to assessment is fair.

The Institute will issue guidance covering:

- The requirements for **EQA bodies**.
- **Accountability and quality improvement** within each of the 4 approaches.
- **Monitoring and evaluation:** Access to RAOs will be secured via SFA Registration. Monitoring will be carried out in 3 ways:
 - i) EQA monitoring, reporting and continuous improvement processes carried out by the EQA body
 - ii) ESFA monitoring using data gathered about individuals, their EPA and certification
 - iii) information gathered from apprentices and employers involved in EPA
- **Direct action** by EQA bodies to continuously improve assessment delivery and assessment instruments.
- **Reviews** carried out by the Institute which may include further investigation, could involve **peer review** and will lead to either:
 - iv) formal advisory improvements in delivery of assessment and/or
 - v) requirements to improve delivery of assessment and/or
 - vi) changes to standards, assessment plans and/or assessment instruments and/or

- vii) reports to the Secretary of State with recommendations which could include withdrawal of the RAO from the Register, withdrawal of the standard and/or the assessment plan. (There will be an appeals process for decisions to withdraw an RAO from the Register)
- The role of the Institute's **Assessment Committee** in taking decisions on reviews. The Committee may also consult the relevant Route Panel and the Institute may also decide to instigate peer review.
 - Methods which could be used to deal with **validity, reliability and comparability**. These will vary by occupational content, assessment methods chosen, volumes of apprentices and number of RAOs.
 - Collaboration on assessment development and **sign-off of assessment instruments** by EQA bodies.
 - Feedback on **occupations and standards**.
 - **Monitoring** the delivery of EPA as a service including

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