

Apprenticeships:

Ofqual's approach to External Quality Assurance of End-Point Assessments



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Introduction

1. This document sets out Ofqual's approach to regulating apprenticeship End-Point Assessments (EPAs), as part of the reformed apprenticeships that government is introducing in England, led by the Institute for Apprenticeships. It provides guidance to employers who wish to seek to appoint Ofqual as a provider of External Quality Assurance (EQA), setting out the benefits we can bring. It also sets out Ofqual's approach to partnership arrangements with other EQA providers, where we might work together with employer groups and professional bodies to support the government's vision for high-quality apprenticeships.
2. The key principles of our approach are:
 - where Ofqual is the EQA provider for an apprenticeship EPA, we will use our assessment expertise and regulatory powers to provide the same degree of assurance that we give to the qualifications we regulate;
 - where Ofqual is the selected EQA for an apprenticeship EPA, all bodies providing the EPA will need to be or become an Ofqual-recognised organisation. Ofqual is not able to provide EQA for any apprenticeship EPAs that are not provided by regulated awarding organisations. Organisations can apply for Ofqual recognition in order to be regulated and should contact us to understand our process and requirements¹; and
 - where Ofqual is not the selected EQA for an apprenticeship EPA, but an EPA falls within a regulated awarding organisation's scope of recognition, Ofqual will regulate it, no matter who is the EQA provider. Ofqual is prepared to work with other EQA providers, in partnership, to bring our regulatory and assessment expertise together with their sector expertise.

Background

3. Ofqual's statutory objectives include securing qualification standards and promoting public confidence in regulated qualifications in England.
4. New apprenticeships are developed by employers who create an Apprenticeship Standard that sets out the knowledge, skills and behaviours required in a specific occupation. The employers also set out how these

¹ <https://www.gov.uk/guidance/apply-to-have-your-qualifications-regulated>

knowledge, skills and behaviours will be assessed, by creating an Assessment Plan. The Institute for Apprenticeships is responsible for approving Apprenticeship Standards and Assessment Plans from April 2017.

5. New apprenticeships must include an EPA that tests whether apprentices can meet the requirements specified by employers, as set out in the relevant Apprenticeship Standard. Employers may also specify additional qualifications that must be completed as part of the apprenticeship.
6. An EPA is intended by government to be 'synoptic'; that is, that it is designed to assess the knowledge, skills and behaviour accumulated throughout the duration of the apprenticeship. Successful completion of the EPA should mean that the individual is fully competent in their occupational role.
7. EPAs can only be developed by assessment organisations who are approved to deliver against specific apprenticeships on the Register of Apprentice Assessment Organisations (RoAAO)² maintained by the Education and Skills Funding Agency. An employer can choose any assessment organisation approved against its Apprenticeship Standard on the RoAAO to conduct its EPA.
8. Each organisation offering an EPA will be subject to a process of EQA. The purpose of EQA, according to the government steer, is to ensure consistency of quality and approach to assessment, and maintain standards over time. EQA is also important where several EPAs are on offer against the same apprenticeship standard, in order, for example, to guard against the risk of standards being lowered by competing organisations.
9. There are currently four options for employers to choose from when deciding how this assurance can be provided.³ These are:
 - to propose their own approach, in line with the quality assurance principles set out by government;
 - professional bodies;
 - Ofqual; or

² This register is a list of organisations that have been assessed as being suitable to conduct independent end-point assessment of apprentices, and be in receipt of public funds.

<https://www.gov.uk/government/publications/register-of-apprentice-assessment-organisations>

³ It is understood that the Quality Assurance Agency (QAA) will be the External Quality Assurance provider for integrated degree apprenticeships

- the Institute for Apprenticeships (in instances where the alternatives are not viable).

Ofqual's approach to External Quality Assurance

10. Where Ofqual has agreed, to provide EQA, we will do so through our regulatory framework, which includes the General Conditions of Recognition (the Conditions). The Conditions⁴ aim to ensure that an EPA is sufficiently valid and that it will continue to be so throughout its lifecycle. Validity is the degree to which it is possible to measure what needs to be measured by implementing an assessment procedure.
11. Our expectation is that an EPA should:
 - reliably test the knowledge, skills and behaviours⁵ specified by employers in the Apprenticeship Standard and Assessment Plan;
 - have a purpose and content that meet the needs of the end users who will be employing apprentices;
 - be graded in line with clear and defensible prescriptions set out in the Assessment Plan;
 - enable results to be trusted as a measure of what an apprentice knows and can do; and
 - be kept under regular review.
12. A request for Ofqual to be the EQA provider should be through a formal letter from the lead employer detailing the approved Apprenticeship Standard(s) and including the draft Assessment Plan(s). These can be emailed to apprenticeships@ofqual.gov.uk.
13. Ofqual will consider the Assessment Plan(s) supplied by the employer with the aim of determining whether the plan will enable awarding organisations to develop an EPA which is sufficiently valid. This consideration will be carried out by a Technical Advisory Group made up of Ofqual assessment experts.

⁴ <https://www.gov.uk/government/publications/general-conditions-of-recognition>

⁵ Future of apprenticeships in England: guidance for trailblazers - from standards to starts December 2015 p34 para 93; <https://www.gov.uk/government/publications/future-of-apprenticeships-in-england-guidance-for-trailblazers>

14. Following our consideration, we will respond to the lead employer, stating either that the Assessment Plan is capable of future regulation, or that it requires further work. We will ensure that employers are given appropriate feedback and guidance to enable them to re-submit a high-quality Assessment Plan that can be used by awarding organisations to produce sufficiently valid EPA in the future.
15. We will provide a copy of this correspondence to the Education and Skills Funding Agency. If a sufficiently valid EPA could be developed, the published Assessment Plan can include a statement which confirms that the EQA is to be provided by Ofqual. The Education and Skills Funding Agency will then only consider Ofqual-recognised awarding organisations for approval against that standard on the RoAAO. This ensures that organisations developing EPAs for the standards where we are EQA are all subject to our regulation.
16. There is separate guidance to becoming an Ofqual-recognised awarding organisation⁶. Our recognition process is proportionate to the intended scope of the organisation applying, and we provide specific support and assistance to organisations who wish to become recognised.
17. We also regulate apprenticeship EPAs where they fall within the scope of recognition of Ofqual-recognised awarding organisations, irrespective of the EQA route chosen. In these circumstances, the Conditions continue to apply.
18. Should an Apprenticeship Standard require achievement of a regulated qualification (for example as a gateway before the EPA), Ofqual will regulate this as we would any other regulated qualification.

Ofqual as an External Quality Assurance partner

19. Through engaging with employer groups and other EQA providers, we are exploring the benefits of entering into partnership arrangements to provide quality assurance. We recognise that employers may wish to draw on the experience and knowledge that sector organisations can bring to their apprenticeships.
20. There are several benefits Ofqual can bring to such a partnership. We have a range of statutory powers that we can use in a proportionate manner when issues arise. This can take the form of requiring awarding organisations to take

⁶ <https://www.gov.uk/government/publications/application-for-recognition-supporting-information>

specific action, so as to secure standards and ensure results can be trusted. At its extreme, it can involve the withdrawal of an organisation's recognition.

21. Where Ofqual is not the EQA provider, a partnership would see us working with the employers and named EQA provider. Our mutual aim, through the deployment of our range of expertise, would be to ensure any Assessment Plan facilitates sufficiently valid assessment prior to it being approved by the Institute for Apprenticeships. We would work with the named EQA provider to scrutinise assessments and ensure validity over time. For Ofqual to undertake this role we would require any assessment organisations delivering EPAs to become Ofqual-recognised.

Appendix 1 – Glossary

Apprenticeship Standard: The knowledge, skills and behaviours agreed by employers that apprentices must meet. 'Standard' may also mean the level of demand of an assessment or qualification.

Approved Assessment Organisations: Organisations listed on the SFA's Register of Apprenticeship Assessment Organisations (RoAAO) that have been approved to offer EPA.

Assessment plan: Developed by a Trailblazer, this provides details of EPA: what it comprises; the assessment methods to be used; and how grading will be applied.

Comparability: Generating assessment outcomes that are comparable in standards between assessments within a qualification, between similar qualifications, with other awarding organisations, and over time. Where an assessment has equivalent forms then it is important to ensure comparability of outcomes. There are two reasons for this –

- (a) to reach fair comparisons about the attainment of Learners: It is impossible to produce different forms with the same content and statistical specifications (such as the level of difficulty or demand on the Learner). Therefore, a requirement to ensure comparability of outcomes makes sure the level of difficulty or demand of the test forms is taken into account when setting standards so that Learners taking the different forms can be compared fairly; and
- (b) to ensure that the outcomes can be used as a measure of standards: outcomes from different forms of the same test must be comparable if they are to be used to measure standards over time. Both expert judgements and statistical procedures such as test equating can be used to ensure comparability of outcomes from different forms of the same test. It is, however, important to ensure that assessments are not so similar that they become predictable, as this would be a threat to validity.

Criteria for Recognition (the Criteria): these are the measures we use to decide whether to recognise an awarding organisation when an organisation applies to be able to develop or award regulated qualifications.

General Conditions of Recognition (the Conditions): All conditions to which an awarding organisation's recognition is subject (including other conditions imposed under section 132(3)(d) of the Act⁷).

End-Point Assessment (EPA): Independent assessment at the end of the apprenticeship.

Gateway requirements: requirements that the apprentice must meet before going on to take an EPA.

Scope of Recognition: When applying for recognition, awarding organisations must indicate what they want that recognition to cover. Recognition can be described broadly or narrowly, so an awarding organisation could have recognition to offer 'vocational qualifications in every sector and at every level' or it might have recognition for a single specific qualification.

Validity: Validity is the degree to which it is possible to measure what needs to be measured by implementing an assessment procedure.

The evaluation of validity involves the development of a clear argument to support the proposed interpretation of the outcomes and consequently the intended uses of the assessment. The validity argument should be built on statements of the proposed interpretation and supporting evidence collected from all stages of the assessment process.

⁷ <http://www.legislation.gov.uk/ukpga/2009/22/contents>

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