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Guidance

Apprenticeship behaviour verification guidance for employers

Updated 21 July 2026

Applies to England

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Introduction

A 2024 Department for Education (DfE) review found that while apprenticeships deliver strong outcomes, the assessment process can be overly complex and burdensome for learners and employers.

In response, the DfE introduced [Apprenticeship Assessment Principles](#) (2025), which aim to simplify assessment, reduce duplication, and ensure closer alignment with employer-defined occupational standards. Responsibility for adult skills policy, including apprenticeship assessment, now sits with the Department for Work and Pensions (DWP).

Skills England is implementing these changes using a data-driven, employer-led and system-simplification model to ensure assessment is aligned to labour market need, implemented pragmatically across sectors, and supports clearer pathways into employment and progression.

Purpose

This guidance provides a simple, proportionate process for employers to confirm that apprentices have demonstrated the behaviours required for their occupation, as set out in the occupational standard. The focus is on recording or logging naturally occurring examples, not gathering extensive evidence or paperwork.

Under the previous gateway to end-point assessment arrangements, employers were required to confirm that apprentices had sufficiently demonstrated the required knowledge, skills, and behaviours. Behaviour verification should therefore be integral to existing performance management and staff development processes.

It is not intended to introduce new assessment systems or additional administrative burden. Instead, it formalises routine and established employer practices, such as supervision, feedback, induction conversations, and regular check-ins, which naturally support and evidence apprentices' behavioural development.

What the changes mean for employers

As part of the new [assessment principles](#), unnecessary duplication within apprenticeship assessment has been removed. Employers will hold primary responsibility for verifying that apprentices have demonstrated the behaviours

required by the occupational standard. Employers are best positioned to make these judgements because they observe apprentices consistently, over time, and within real workplace contexts. This further utilises local knowledge, supports competency in the occupation, reduces bureaucracy, and provides greater ownership of behaviours within an authentic work environment.

Behaviours remain a mandatory component of every occupational standard. To progress to gateway to completion, the employer must confirm that each behaviour statement has been sufficiently demonstrated during the programme.

This requirement sits alongside other gateway conditions, including the completion of on-programme assessments, achievement of mandatory qualifications (where applicable), and meeting English and maths requirements.

Employers are responsible for reporting their behaviour verification to the organisation requesting the apprenticeship certificate. Assessment organisations and training providers are not required to assess behaviours or quality assure employer decisions.

Behaviours do not contribute to apprenticeship grading. They must be demonstrated at a sufficient level for a certificate to be issued, but they do not influence whether an apprentice achieves a pass or distinction.

Behaviours remain a core component of occupational standards as they reflect the attitudes, values and professional conduct required for competent occupational performance, complementing knowledge and skills. While behaviours do not contribute directly to grading, their inclusion ensures that apprentices demonstrate the full range of occupational competence, not solely technical proficiency.

Requiring behaviours to be evidenced to a sufficient level for certification maintains employer confidence that apprentices are workplace-ready, capable of operating effectively within real organisational environments.

The decision not to include behaviours in grading supports a more proportionate assessment approach, reducing complexity and subjectivity in high-stakes grading decisions, while still retaining behaviours as a gateway requirement for completion. This strikes a balance between ensuring rigour and supporting a more streamlined and flexible assessment system aligned to employer needs.

Employers will monitor behavioural development throughout the programme and confirm sufficient demonstration of all required behaviours before an apprenticeship certificate can be requested.

A certificate will not be issued without this employer confirmation. Behaviours are required because they form part of the statutory definition of occupational competence and remain a mandatory, condition of completion.

Scope

Behaviour verification aligns with existing employer processes for managing, supporting and developing staff performance. Most employers already set behavioural expectations, provide ongoing feedback, and monitor staff development. This process is designed to sit alongside and complement those familiar systems, not replace or duplicate them.

The behaviours checklist is an optional template (see annex) available to use for capturing helpful examples. This template does not need to be used if employers already have systems in place to track behaviours.

Definitions

Behaviour

The professional attitudes, conduct and standards described in the occupational standard, demonstrated consistently in real work situations.

Consistently demonstrated

Means the behaviour has been observed repeatedly and over a sustained period, across a range of tasks or contexts, in real working conditions appropriate to the level of the occupation.

Table 1 shows the roles and responsibilities when verifying behaviours.

Table 1: Roles and responsibilities

Role	Responsibilities
Apprentice	Demonstrate behaviours. Reflect on feedback. Keep a log of examples where they have demonstrated the required behaviours.
Line Manager/Mentor	Provide opportunities for behaviours to be demonstrated. Note naturally occurring behaviours. Gather optional peer feedback where useful. Review progress and agree supportive, practical actions.
Training Provider Coach	Support progress reviews where appropriate. Provide guidance on assessment requirements. Maintain regular contact with both employer and apprentice as part of the tripartite relationship (this may happen through individual or bilateral discussions, rather than joint meetings with both the employer and apprentice).

Behaviour verification sign-off

The employer is responsible for confirming that the apprentice has demonstrated the required behaviours. Behaviours must be verified by someone (or a combination of people) who has worked closely with the apprentice and who has sufficient oversight of the apprentice, their work and an understanding of the behaviours set out in the occupational standard. This would usually be the apprentice's line manager or equivalent.

In settings where apprentices work across multiple teams, placements, or shift rotations, organisations should identify who is best placed to provide sign-off. This could include:

- the apprentice's main line manager or mentor
- a supervisor responsible for a specific placement or rotation
- an organisational apprenticeship lead

Input may be collected from several colleagues across the business or shift rotations, but a single employer confirmation should be provided at the gateway to completion.

Flexi-job apprenticeships

Flexi-job apprenticeships involve apprentices working with multiple host employers, so behaviour verification should remain proportionate, practical and aligned with the principles in this guidance. The flexi-job apprenticeship agency (FJAA) or lead employer retains overall responsibility for verifying behaviours at gateway to completion.

The FJAA or lead employer should draw on behaviours demonstrated during routine work activities in real workplace settings, rather than through simulated or one-off assessment tasks as observed and evidenced by each host employer during placements.

Host employers should offer feedback on behaviours demonstrated while the apprentice was under their supervision. The FJAA or lead employer should collate this information to form a complete picture of behavioural development and competence across placements, issuing a single confirmation at gateway to completion.

Variations in how behaviours are demonstrated across workplaces should be considered collectively as part of an aggregated view of performance, rather than in isolation.

All parties (including the FJAA, lead employer and host employers) must have a clear and shared understanding of their roles, responsibilities and evidence requirements from the outset, particularly where placements are frequent or of short duration, to ensure consistent, robust and auditable verification of behaviours at gateway.

Assessment context

Employer confirmation that behaviours have been demonstrated consistently is one part of the gateway to completion requirements.

Apprentices must also meet all other criteria set out in the apprenticeship assessment plan, including on-programme assessment requirements, any mandated qualifications, and English and maths requirements where applicable.

Employer sign-off reflects that behaviours have been consistently demonstrated during the apprenticeship programme. It does not imply long-term or future competence of these behaviours in every situation; rather, it forms one part of a broader approach to confirming readiness for apprenticeship completion.

It is the responsibility of the employer to report their verification of the behaviours to the organisation requesting the apprenticeship certificate (usually an assessment organisation, training provider, college or Higher Education Institution).

Suggested process overview

This suggested approach can be used by apprentices, line managers or mentors, and training provider staff involved in supporting apprentice development.

1. Identify required behaviours and populate a behaviour checklist.
2. Discuss the behaviour expectations with the apprentice during induction or early onboarding.
3. Collect and record ongoing evidence, including naturally occurring behaviours you have observed, a suggested form is available that provides a behaviour checklist and includes the option to track progress (1=not yet meeting expectations; 2=developing; 3=consistently demonstrated).
4. Hold periodic review discussions (employer-apprentice; employer-provider; apprentice-provider) as part of the expected tripartite relationship, noting that these discussions may take place bilaterally rather than all together.
5. At the gateway to completion, confirm that either all behaviours have been demonstrated consistently and recorded, or, if the behaviours have not been demonstrated consistently (in this case the apprentice will not meet the requirements for an apprenticeship certificate to be issued).

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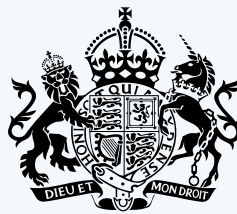
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