

End Point Assessment in Apprenticeships: a review of evidence and opinion

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This report was commissioned by Ofqual, in February 2024, to establish the prevalence of published research and analysis concerning the strengths and weaknesses of End-Point Assessment policy and practice in England and to offer reflections on the scope and quality of the research and analysis identified. The views expressed are those of the report authors, not Ofqual.

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Glossary

Term	Definition
Apprenticeship	An apprenticeship is a job that combines practical training with study. See “A guide to apprenticeships” on GOV.UK for further information.
Apprenticeship framework	These were developed by sector bodies, primarily focused on qualifications. They were replaced by apprenticeship standards. Framework apprenticeships were assessed throughout by completing a unit at a time but there is no end point assessment
Apprenticeship standard	Apprenticeship standards are employer-led, meaning that employers can specify exactly what is required from an apprentice in each specific role. They outline the knowledge, skills and behaviours required to carry out a certain job role.
Awarding organisation	An organisation recognised by the qualifications regulators in England, Wales, or Northern Ireland to develop, deliver and award qualifications.
Employer provider (sub-set of employer respondent group)	Delivers some, or all, of the off-the-job training element of an apprenticeship to their own staff, or to other employers' staff, as well as their own staff.
End Point Assessment	The final stage of apprenticeship determines that the apprentice has the knowledge, skills and behaviours as set out in the standard. The name given to a series of tests an apprentice must take to prove their ability to do the job they have been training for. These tests take place at the end of an apprenticeship following a period of training and development, often referred to as the ‘on-programme’ period.
End Point Assessment Organisation	An independent organisation that oversees the End Point Assessment using independent assessors. Any organisation is eligible to deliver assessment services against this standard by meeting the requirements of the Education and Skills Funding Agency's Register of End Point Assessment Organisations. Individual employers must select an organisation from those that register to deliver assessment services.
External quality assurance	The process to ensure comparability across different End Point Assessment Organisations and within the apprenticeship system more widely.
Functional Skills qualifications	Functional Skills qualifications are available in English, maths and ICT and are available in levels from Entry 1 to Level 2. Functional Skills assessments test the fundamental, applied skills in these subjects which help people gain the most from life, learning and work.
Gateway	Variously used as the point when requirements are shown to have been met for entry to the end point assessment and the period of time between on-programme elements being completed and the End Point Assessment being carried out.
Independent assessor	The assessor is also known as the End Point Assessment independent assessor. The assessor manages and is accountable for all aspects of the End Point Assessment, including verification that the gateway is satisfactorily met and planning for all assessment components.
Institute for Apprenticeships and Technical Education	The Institute for Apprenticeships and Technical Education ensures high-quality apprenticeship standards and advises the government on funding for each standard. They consider and approve expressions of interest, apprenticeship standards and assessment plans submitted by employer groups. They oversee the development, approval and publication of apprenticeship standards and assessment plans (as well as the occupational maps for T levels) for apprenticeships.
On-programme	The period of training from registration until the gateway is met. This includes all training and qualifications specified within the standards required on programme. All preparation for the End Point Assessment is completed in this phase, and this is the significant area of interest for apprenticeship training providers.

Other Vocational & Technical Qualifications	These normally have a vocational focus, and for this report refer to qualifications other than FSQs and EPAs. These mostly refer to National Vocational Qualifications (NVQs), although these are not the only types that were referred to.
Relationship manager	Relationship managers work for the Institute for Apprenticeships and Technical Education and are allocated standards per sector. They work with all involved with the standards and the assessment plan.
Trailblazer	The employer group that leads the way; the trailblazer group develops the standards.
Trailblazer group	Trailblazers are groups of employers that come together as the creators and early adopters of new apprenticeship standards. Focused on the specific knowledge, skills, and behaviours for their sector, they work together, supported, and guided by the Institute, to develop new programmes of learning that will directly impact their workforce. The trailblazer membership covers a wide range of employers (at least 10).

Source: DfE (2019) and IfATE Glossary

(<https://www.instituteforapprenticeships.org/about/glossary/>)

Overview

This report reviews the relevant empirical literature and opinion pieces on End-Point Assessment (EPA). The intention is to inform Ofqual about the knowledge base that has developed since 2010 and the reform to apprenticeship assessment. Given that the research on EPA is known to be slight, we highlight key gaps in the literature and indicate where further analysis and research may be most needed.

Background

The context for this review is the radical changes to apprenticeships and their assessments ushered in by the 2012 *Richard Review* and the government's acceptance of the main recommendations (BIS, 2013). Central to these reforms was the switch to end-point assessment in the new standards, a radical departure from the continuous assessment of the previous apprenticeship frameworks.

These reforms have been high profile and attracted considerable political attention and funding. Apprenticeships are regulated by a range of agencies (for example, IfATE, Ofqual, ESFA) while their assessment, which must be externally conducted, is operated by multiple, and competing Assessment Organisations (AOs), which are independent of the employers responsible for delivering apprenticeship standards.

Despite this high profile and extensive quality assurance arrangements, there has been only limited in-depth research and evaluation into their implementation and assessment.

Method

We conducted a systematic literature search on apprenticeship and EPA followed by individual review of relevant items. Ninety-five post-2010 publications were identified and screened, with nine identified as salient and included in the full-text review. Additionally, we undertook hand searches of relevant journals, media outlets, and think tank/stakeholder publications and followed up on relevant references. We also contacted five recognised experts in the field of apprenticeship research and discussed their views of EPA and relevant research and asked them to share additional relevant publications. These experts were chosen as the key individuals who had published research or commentary on EPA and featured in our literature searches.

Findings

For a major initiative that has been in place for a decade there is surprisingly little published research. Reports on apprenticeship from organisations such as the Gatsby Foundation, Edge, and OECD (Organisation for Economic Cooperation & Development) have provided much of the analysis, often conducted by the small pool of experts we drew on.

EPA is predicated on the approved apprenticeship standard. Some design features of the standards impact on the validity of their assessment. One question asked by our experts was why a successfully completed apprenticeship was not regarded as a qualification (as it is internationally). The reluctance to allow other occupational qualifications as part of an apprenticeship was also challenged.

England has many more standards than other international systems. The concern is that this narrowness, and lack of a common National Apprenticeship Curriculum, limits transferability to outside the employment in which the apprenticeship was gained.

The free market provision of EPA by competing AOs raises concerns about reliability and comparability. The complex framework of providers and processes is a source of confusion for apprentices and employers, and risks creating equity issues.

Assessment issues. England is an outlier in having no role for ongoing or periodic assessment. While this is breaking down in degree apprenticeships, some experts feel this absolute rejection of any ongoing assessment needs reconsidering.

The function of the Gateway is to ensure the requirements of the standard have been met by the employer and apprentice. Compliance allows the apprentice to move forward to end-point assessment. There is compelling evidence that many apprentices are not receiving their mandated 20 percent off-the-job training – an equity issue – yet pass the Gateway.

EPA attracts substantial investment and bureaucracy. Some 97 percent of candidates who take the EPA pass, perhaps indicating issues with validity and reliability. The suggestion is that much of this effort would be better spent in identifying the causes of pre-Gateway drop-out.

The requirement to grade an apprentice has led to several different grading schemes. This is potentially confusing. How grades are decided, and consistency grading does not appear to have been systematically researched.

Conclusions

This review reveals a surprising lack of rigorous research or commentary on apprenticeship EPA in England. Existing literature mainly comprises professional observations, some

quantitative reports, and broader reports and perception surveys on apprenticeships, without a detailed focus on EPA. This highlights a significant absence of systematically generated evidence or research on EPA since the Richard Review, emphasizing the urgent need for further research into EPA policy, implementation, and associated market-based structures that support its design and delivery. The evident gaps in knowledge point to critical concerns that require attention. The report highlights three key areas that urgently require further research: structures and institutions; EPA practice; and EPA quality.

Introduction

Background to the research

The introduction of End Point Assessment (EPA) in England marks a notable change in assessment policy. Following the Richard Review (2012), EPA replaced the continuous assessment approach that had been in use since the late 1980s and the introduction of National Vocational Qualifications (NVQs). The Richard Review of Apprenticeships recommended the introduction of 'recognised industry standards' to establish 'what apprentices should know and be able to do at the end of their apprenticeship (2012, p.17). The review criticised continuous assessment approaches as time consuming, but, more importantly, at risk of being reduced to a box ticking exercise with little meaningful formative or summative assessment value.

Consequently, Richard made the following key recommendations which contributed to the transformation of the apprenticeship model in England and particularly assessment (Richard, 2012; Keep et al., 2024):

- Apprenticeships should be targeted only at those who are new to a job or role that requires 'sustained and substantial training.'
- 'End-point assessment' should replace continuous ongoing assessment to ensure that the focus is on the outcome of an apprenticeship (what the apprentice can do when they complete their training).
- Assessment must be independent i.e., not influenced by any financial incentives.
- Recognised industry standards should form the basis of every apprenticeship.
- All apprentices should reach a good level in English and maths before they can complete their apprenticeship.
- The purchasing power for investing in apprenticeship training should lie with the employer.
- Employers and government should be jointly responsible for safeguarding quality.

In 2013, BIS and DfE responded positively to Richard's review and published 'The Future of Apprenticeships in England: implementation plan'. This confirmed the main aspects of the new apprenticeship system, including the rollout of 'Trailblazer' projects to write the new employer designed standards, independent end-point assessment, grading for apprenticeships and withdrawing all existing 'apprenticeship frameworks' by 2017/18. This also introduced grading in apprenticeships (pass, merit, and distinction). However, there were mixed responses to the subsequent consultation and concerns that grading was problematic in competency-based assessment contexts. Therefore, it was agreed that

Trailblazer groups devising new standards could apply for an exemption from grading for specific standards (not rolled out at sector level) if appropriate.

In 2015, BIS published ‘English Apprenticeships: our 2020 vision’, a strategy document outlining the government’s plan for improving the quality and quantity of apprenticeships, aiming to reach apprenticeship starts by 2020. This introduced a range of key reforms, particularly the creation of the Institute for Apprenticeships (IfA), which would oversee the design and delivery of apprenticeships (BIS, 2015; Keep et al., 2024). Following the Sainsbury et al. (2016) report and the ‘Post 16 skills plan’ (DfE, 2016), the remit of IfA was expanded to include all technical education at Levels 2-5. This meant that at the introduction of the Technical and Further Education Act in 2017, IfA became IfATE (Institute for Apprenticeships and Technical Education).

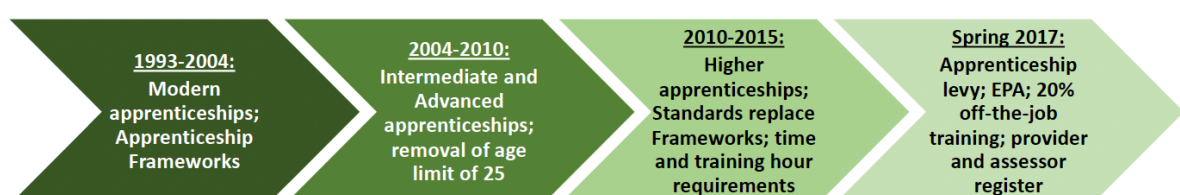
These reforms saw a radical shift from an apprenticeship framework to an apprenticeship standard. The old apprenticeship framework was primarily qualification focused and was criticised throughout the reform process as meaning that some apprentices could achieve the qualification but still not have the right skills to be competent in their occupations. To address this, the apprenticeship standards were viewed as focused on achieving occupational competency rather than a qualification. Each standard contains a list of the knowledge, skills, and behaviours (KSBs) deemed necessary to be competent and are tested at the end of the apprenticeship through an independent end-point assessment (EPA).

Key Policy Moments:

Dickinson and Hogarth (2021) provide a useful overview of the major events in apprenticeship policy since the early 1990s (see Figure 1). Within this broad overview, the key policy moments that have shaped EPA are:

- Richards Review Publication – 2012
- Response – March 2013
- Implementation Plan – October 2013
- Standards Consultation – 2014
- Technical and Further Education Act – 2017
- Establishment of IfATE – 2017

Figure 1 An Overview of Apprentice Reforms



Purpose

This review provides an overview of relevant literature on End Point Assessment (EPA) in Apprenticeships in England since 2010. EPA for apprenticeships was brought in following the Richard's Review in 2012 and represents a notable change in assessment policy and practice. However, holistic analysis of EPA at the system level has received little research attention or wider commentary. Therefore, in this review, we aim to provide an overview and bring together what research and evidence exists on EPA. The focus is on England and on literature published since 2010, to capture some of the research and policy discussion in the run up to the publication of the Richard's review and subsequent roll out of EPA.

The goal is to review the research base on apprenticeship assessment. As such, the review has four core aims:

1. To provide a succinct overview of apprenticeship assessment policy and practice in England since 2010.
2. To provide a review of evidence and informed opinions related to the strengths and weaknesses of End Point Assessment in apprenticeships in England since 2010.
3. To provide an overview of the scope and quality of existing research in this area.
4. To identify critical relevant issues for further research.

Methods

The review has been based around two key approaches: consultation with key researchers and experts in assessment in vocational education and training (VET) and apprenticeships specifically; and a systematic search of relevant literature and media.

Consultation

We identified five key experts in VET assessment, drawing on our own networks and knowledge of the field and reflecting the key individuals who had undertaken research on EPA or who had published relevant commentary (based on our initial literature searches). To bolster this rapid review, informal conversations were held with each expert about the field of research on EPA, key issues, and key publications (formal interviews and data collection were not conducted). Publications identified through these conversations were then included in the systematic review.

Systematic Search and Review

Systematic searches were undertaken to identify relevant literature. These searches involved identifying literature through:

- Expert consultation
- Hand searches of key journals (*Journal of Vocational Education and Training*; *Journal of Education and Work*; *Journal of Further and Higher Education*; *Journal of Education Policy*; *British Educational Research Journal*)
- Hand searches of key media outlets (FE Week; FE News),
- Hand searches of policy documents,
- Hand search of publications from key organisations (IfATE, WorldSkills, The Edge Foundation, SKOPE working papers)
- Systematic searches of key bibliographic databases (Web of Science, British Education Index, ProQuest's Education Collection (including ERIC), Google Scholar, and Scopus)

The systematic searches of relevant databases were the primary mechanism for including literature. These included academic, academic related, and policy publications, due to the multiple databases used for searches. Initial search criteria included the phrase 'end-point assessment.' However, this produced no results. Therefore, searches were conducted on 'apprentice* AND assessment AND (UK OR England).' We included 'UK' as an option to capture potential cross-jurisdictional studies. The results were filtered to exclude anything published before 2010.

Searches produced 95 publications (after duplicates were removed). These were screened by the project team against inclusion criteria: focused on EPA; focused on England; published after 2010. Literature on standards related to specific occupations were excluded if they did not discuss EPA in more general terms. Following screening, 14 publications were selected for inclusion. Two documents were not included due to the unavailability of access and another three studies were excluded due to the lack of rigour in the research design. This was reduced to nine on full text review. These nine documents are indicated with asterisk in the reference list. These were combined with literature found through hand searches and identified by experts.

All the documents were reviewed by the project team who identified key themes through an iterative process of analysis and collaborative discussion through regular meetings.

Team

The review has been conducted by researchers at Oxford University Centre for Skills, Knowledge, and Organisational Performance (SKOPE) and Oxford University Centre for Educational Assessment (OUCEA). The team comprised:

Gordon Stobart – Honorary Research Fellow, Oxford Department of Education and Emeritus Professor, UCL

James Robson – Director of SKOPE, Oxford Department of Education

Jo-Anne Baird – Director of OUCEA, Oxford Department of Education

Yushan Xie – SKOPE Research Fellow, Oxford Department of Education

Review of Literature: Key Themes

The findings sections of this review are divided into three main sections:

- standards and their assessment;
- assessment structures and the assessment market;
- assessment in practice –gateway, EPA, and grading.

We address key themes and issues in each of these sections.

1. Standards and their assessment

The EPA is predicated on the requirements found in the occupational standard. The validity of the standard is therefore critical to the apprenticeship's effective assessment. The Richard reforms gave responsibility to employers to ensure strong face validity. Our review raises some questions in relation to the standards which impinge on EPA, illustrated in the following key themes.

1.1 The formal status of a completed apprenticeship – a qualification or not?

The Sainsbury Review argued for recognition of technical qualifications (2016):

We recommend that, for both employment-based and college-based technical education at Levels 2 and 3, there should be a single, nationally recognised certificate for each technical education route (p.14).

This has not been applied to apprenticeships and several authors point to complexity and confusion around whether apprenticeships are considered qualifications or not. Unwin noted that the language of 'qualification' still permeates a lot of apprenticeship publicity material. For example, it is common to refer to 'work-based qualifications' and phrases like 'earn a salary while gaining a qualification' are common in a wide range of contexts. Confusion is compounded by the issue of degree apprenticeships, which are fundamentally rooted in qualifications and enable apprentices to gain a full Bachelors or Masters level degree (MacKay, 2022).

Several authors raised concerns around this confusion and the wider relationship between EPA, qualifications, and standards (Unwin, 2017; MacKay, 2022; Field, 2023). A key issue is whether a lack of a formal apprenticeship qualification prevents apprentices from navigating the labour market in the longer term. Unwin argued that, ultimately, qualifications still play a powerful role in society, providing key signals and messages about the skills and capabilities an individual possesses and establishing recognisable hierarchies

of expertise that shape a wide range of recruitment and employment decisions. Qualifications enable individuals to navigate and progress in the labour market and this is increasingly critical in the current febrile economic climate, where individuals are far more likely to need to change roles and even careers multiple times over the course of their working lives. Qualifications, it is argued, underpin the practical transferability of skills developed during an apprenticeship (Unwin, 2017).

For Field, a key part of this involved establishing ‘a formal name for the apprenticeship qualification.’ He argued that, unlike other countries, a lack of a recognised apprenticeship qualification ‘makes no sense and devalues apprentices’ and that

a name would enable graduates of the English apprenticeship system to point with pride to their qualifications and bring them in line with their counterparts in other countries and those in England with other qualifications (Field, 2023, p,4).

For these authors, the purpose of EPA should be fundamentally tied to a formal apprenticeship qualification.

1.2 Other qualifications within the apprenticeship.

The need to include qualifications in apprenticeships was initially questioned in responses to the Richard’s review (BIS, 2013) and then actively discouraged in design guidance to employers (BIS, 2015). The view was that EPA provides definitive evidence of whether the apprentice has acquired full competence, qualifications should not generally need to be included within an apprenticeship. However, there is confusion over the kinds of qualifications associated with apprenticeships. The reforms removed formal credentials from most apprenticeships, but this has been complexified by degree apprenticeships fundamentally being tied to degree-based qualifications and certain roles requiring specific qualifications as an indication of competency or for validation by professional bodies (e.g. health care professionals; see Lillis and Varetto, 2020).

As indicated above, Unwin (2017) criticised the confusion around qualifications associated with EPAs. She argued that the retreat from nationally recognised qualifications within an apprenticeship, as part of the apprentice’s learning journey, impacted on potential labour market mobility for apprentices and future access to qualifications through CPD (Continuing Professional Development) as well as Further and Higher Education.

As part of these and wider concerns within the VET sector on the relationship between qualifications and EPA, in 2022 IfATE consulted on and presented a modified range of proposals on mandatory qualifications in apprenticeships (excluding degree apprenticeships). The key decisions from this process that are particularly relevant to EPA were (IfATE, 2023):

- Qualifications can be included in apprenticeships if Trailblazer groups can demonstrate that studying for a qualification is essential for future, sector-specific career progression for the apprentice. In these instances, guidance that accompanies new criteria will need to include detailed explanations of labour market requirements for specific qualifications.
- Justification for qualifications being included in apprenticeships on teaching and learning grounds are not deemed sufficient without labour market-based justifications. In some sectors (e.g. technology), rapid development may mean that content related to qualifications is essential for career progression but cannot be included in standards quickly enough. In these instances, qualifications can be mandated if relevant evidence is provided.
- Qualifications cannot be mandated on the grounds of providing breadth and depth to the apprenticeship – while qualifications might stretch and challenge more able apprentices, IfATE views them as potentially introducing unnecessary hurdles and disadvantaging the majority of apprentices.
- Evidence required for mandating qualifications will be made more robust. This should include: evidence and value related to professional body registration and professional bodies to work with trailblazer groups; evidence on sector specific recruitment practices to illustrate qualification need; details on actual labour market need for qualifications; and information on any disadvantage an apprentice would experience without the qualification.
- Although not specifying the process in detail, where possible, qualifications should be directly integrated with EPA. This includes: certification and qualification are aligned and take place in the same period and are contingent on the apprentice being awarded a passing grade for at least one shared assessment; all reasonable steps are taken to remove duplicated assessment; integrated assessment must be set by the qualification awarding body; onscreen assessment must be invigilated by someone with sufficient independence and practical assessments must be administered by someone with sufficient expertise.

However, we found no further information or commentary on the process of rolling out these changes, take up by Trailblazer groups, or the wider implications for EPA.

1.3 Narrow standards limit transferable skills

Associated with a wider critique of confusion around qualifications, although not focusing directly on EPA, several authors criticised the process of standard setting for EPA. A few authors observed that narrow standards, and by association the EPA, limit transferability and occupational mobility by failing to support apprentices to develop transferable skills.

Too much focus is placed on occupational specificity at the expense of broader transferable skills (see CIPD, 2020; Richmond, 2018; Kuczera & Field, 2018). The Edge Foundation states:

Some of the new standards risk training individuals for a very specific role with very few broader transferable skills, at the very time when the Fourth Industrial Revolution is beginning to create rapid change in the labour market that will require individuals to change occupations or even industries several times during their career. (The Edge Foundation, 2019, p.35)

Field's Gatsby Foundation Report (2023) similarly pointed out that some English apprenticeship standards are narrower in their occupational coverage than in other countries. This limits the ability of English apprentices to develop transferable skills that would enable them to navigate the labour market in the longer term. Field argued that while apprenticeships need to provide skills for specific jobs, if they are to have lasting value trainees need to be able to adapt to changing roles and technologies. This requires breadth of training, breadth within standards, and an approach to assessment that leads to transferable skills and qualifications.

The narrowness at the heart of English standards is illustrated by the number of standards that have been developed by Trailblazer Groups compared to other countries. While in 2023 IfATE had approved 475 Level 2-4 standards, in Germany the figure was 320, in Switzerland 245, in Austria 230, in Denmark 100 and in Ireland 65. Recent analysis has shown that around one in ten approved apprenticeship standards have attracted no apprentices, and that eight of the unused standards have been approved for five years (Chowen, 2023). Making a series of normative recommendations, Field argued for a smaller number of broader standards:

through engagement with trailblazer groups and revised regulatory criteria, IfATE should ensure apprenticeship standards are simplified and have sufficient breadth with transferable competencies adequately included (Field, 2023, p.3).

1.4 Employer interests limit transferability for apprentices

Field (2023) further argued that the narrowness, complexity, and messiness involved in standards and EPA are rooted in the process of standard setting itself. He argued that the fact that Trailblazer groups comprise only a small number of members and are dominated by occupation-specific employers foregrounds narrow interests of employers at the expense of the longer-term careers of apprentices. Research by Schweri and colleagues showed that employers were reluctant to support the inclusion of wider transferable skills or qualifications that would enable their employees to move jobs or sectors (Schweri et al, 2021) and that employer representatives failed to include (or consider the perspectives of) other stakeholders, including apprentices themselves and wider employer groups.

In other words, a tension between narrow, short term employer needs (embedded in standards) and the longer-term career needs of apprentices to develop transferable skills sits at the heart of standard setting and EPA. This tension and a wider concern that uncertainty in the future labour market will require a workforce with broad transferable skills led the Skills and Productivity Board to recommend that direct government intervention and support is needed to broaden apprenticeship competencies. Members of the Skills and Productivity Board argued that current apprenticeship standards and, by extension, EPA, failed to adequately meet current and future skills needs (Skills and Productivity Board, 2022).

The focus on specialisation from Trailblazer members, Field (2023) argued, is combined with regulatory criteria for standards that both allow for and encourage high levels of specialisation with no limit to the overall number of standards introduced into the apprenticeship system. This has led to the proliferation of standards referred to above and the extensive number of organisations involved in the EPA process.

1.5 EPA and National Apprenticeship Curricula

Unlike most international contexts, there are no national curricula for apprenticeships in England. Following the Richard Review, training providers develop and use their own curricula. The logic being that ‘...testing is particularly important in the model of apprenticeships that I am proposing, where we are flexible about the content and curricula but rigorous on the outcome...’ (Richard, 2012, p.54). This assumes that EPA is sufficiently rigorous to ensure that inadequate curricular will be challenged when they lead to high rates of failure (Field, 2023, p.43).

However, Field questioned this assumption in two key ways:

Occupational competence involves a blend of knowledge, skills, and behaviours, which is much harder to test than academic skills in knowledge-based examinations. Unfortunately there is little solid evidence for the validity, and often even the reliability of the technical assessments used to test for such competence. Convincing tests of occupational competence require real-world assessments of the ability to do a specific job and are therefore difficult to standardise (2023, p.43).

The failure rate in end-point assessments for English apprenticeship is only around 2.5%, significantly lower than in the assessments of comparable countries (for example, in Germany it is around 10%, in Norway around 7%). This suggests that end-point assessments are primarily being used as near-automatic confirmation of the individual employer’s decision that an individual is ready to complete their apprenticeship. (2023, p.43)

Arguing that EPAs with a pass rate of 97.5% do not provide meaningful assurance that sufficient training has taken place, Field advocated for national curricula for apprenticeships, developed by Trailblazer groups in consultation with training providers and

IfATE that would include standards, detailed assessment plans, and clear expectations for employers. This is linked to the critique, referenced above, that numerous narrow standards are failing to provide apprentices with appropriate transferable skills. National curricula for apprenticeships would provide the basis for transferability in a way that could be assessed through EPA.

1.6 Limited off-the-job training entitlement as a washback effect of EPA

As part of the wider argument for national curricula for apprenticeships, Field also highlighted the key issue of off-the-job training. He pointed out that many apprenticeships often fail to provide apprentices with appropriate off the job training and that national curricula, backed up by EPA, would improve practice in this area (Field, 2023, p.57).

The Richard Review expected that off-the-job training should be delivered off-site. The Sainsbury Review argued that apprenticeships for young people should involve ‘at least 20% off the job learning of knowledge (in a college or private training provider)’. Concerns around the allocation of meaningful off-site training are raised by a few different authors. For example, Brockman et al. (2020) and Richmond and Regan (2022) describe different ways in which employers find inventive ways of counting on the job activities as contributing to the 20% off the job allocation. This has resulted in more than half of apprentices not receiving their off the job training entitlement and 15% of apprentices receiving no off the job training at all (Field, 2023; NAO, 2019).

The National Audit Office review of apprenticeships raised the fact that apprentices are not receiving their statutory off the job training entitlement as a point of significant concern (NAO, 2019). Similarly, many reports and studies specifically address this issue, highlighting, for example, how even when off-site training is offered, it often simply took the form of self-study or online learning (e.g., Brockman et al, 2020).

Most of these studies do not address issues related to EPA. However, Field (2023) drew some connection between the tensions between off-site entitlement, poor employer practices, and the role that EPA plays in curriculum design, teaching, and learning. He pointed out that a combination of on the job and off the job learning was internationally recognised as best practice. It is theoretically built into current apprenticeships in England. However, the fact that poor curricular practices and failure to provide apprentices with meaningful off the job learning opportunities can be, in part, viewed as a washback effect from the introduction of EPA. The fact that the underpinning logic of EPA renders the approach to learning, curriculum design, and training entitlement largely irrelevant means that poor practice by employers and training providers are not picked up or appropriately

challenged. In fact, the logic of EPA can be seen as encouraging poor training practice (Field, 2023).

Lillis and Varetto (2020) raised a similar concern arguing that DfE “quality improvement” priority actions for IfATE are concerned solely with its mission and procedures in relation to the continuous improvement of EPA, and not the quality improvement of teaching or learning. There are, they argue, in fact, no mechanisms described in IfATE documents which address how the quality of apprenticeship provision might be improved, other than subtractive actions, such as the weeding out of inadequate apprenticeship providers by the ESFA (DfE, 2018a, 2018b).

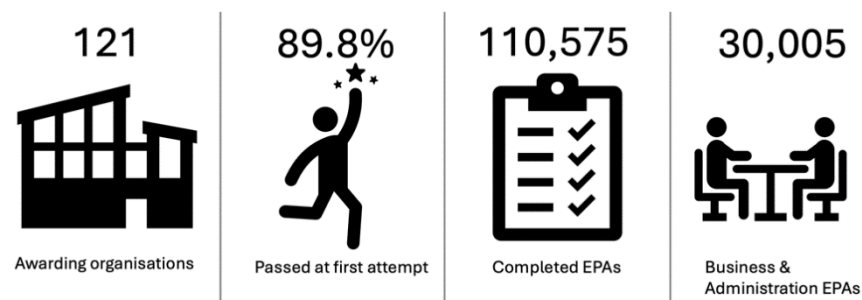
2. Assessment structures and the assessment market

Apprenticeships operate within a complex matrix of responsibilities and accountability. The division of responsibilities results in a densely bureaucratic model of assessment roles. We found little independent research into the functioning of this model, which is an international outlier in having such complex quality assurance and control structures. However, in this section we highlight some of the relevant literature that demonstrates this complexity and some of the implications for EPA.

2.1 Complexity in the shape of the market.

Statistics for 2022-2023 showed that there were 121 awarding organisations offering end point assessments who were regulated by Ofqual, with most learners passing at first attempt (Figure 2). Over 100,000 candidates completed all the end point assessments required for an apprenticeship and the most popular sector was Business and Administration, with over 30,000 EPAs being taken successfully in that subject. The Department for Education announced that the budget for apprenticeships will exceed £2.7bn in 24-25 (Camden, 2024). The number of Further Education and skills providers funded to offer apprenticeships in 2023 was 1,385 (Ofsted, 2023). Ofsted’s inspections of apprenticeship training providers have been more favourable in recent years, with 76% being deemed good or outstanding in 2022-2023 compared with only half in 2016-2017 (NAO, 2019).

Figure 2 Apprenticeship statistics

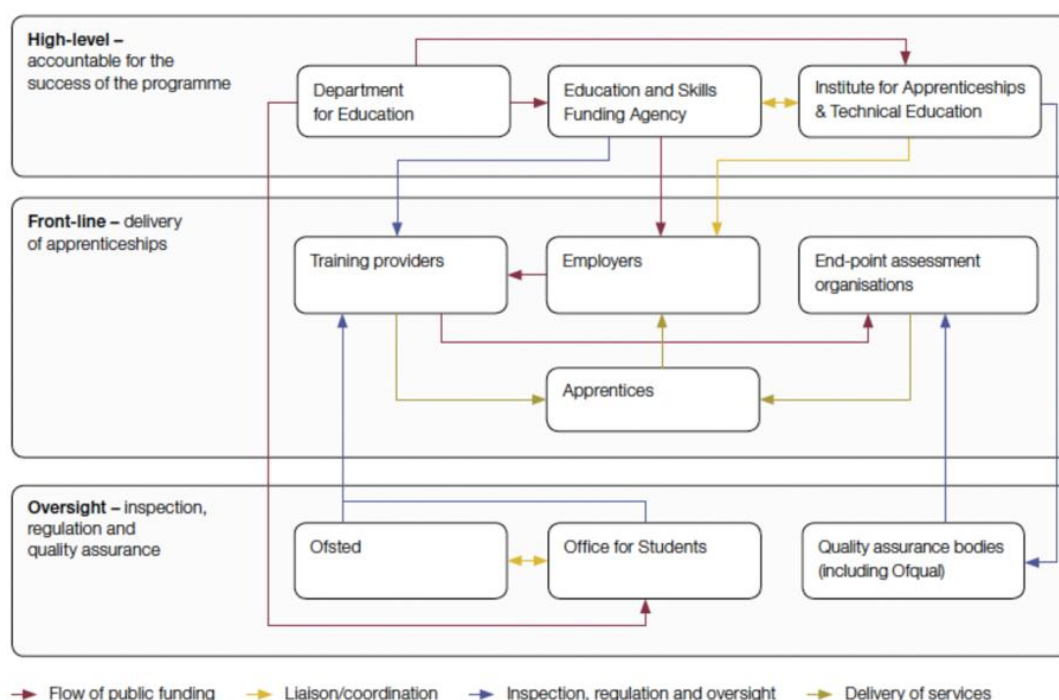


Source: Ofqual (2023a)

Changes to technical education following the Richard Review have meant that new relationships have been formed between organisations including universities, employers, IfATE, and the Education and Skills Funding Agency (ESFA). This has resulted in new (and ever-changing) processes and requirements from external agencies and has led to frustration and shifts in the balance of power within and between the organisations (MacKay, 2022).

This means that the regulatory landscape for apprenticeships is complex (Figure 3), with Ofsted and the Office for Students each having responsibility for training provider standards and the Education and Skills Funding Agency having high level accountability for the success of the programme for training providers and employers. IfATE is also involved in overseeing employers, including through the gateway process, and in producing the standards which shape the end point assessment standards. Given the shortage of assessment skills generally, there are issues about the capacity to design, deliver and regulate assessments at a high level of quality across all the levels shown in Figure 3.

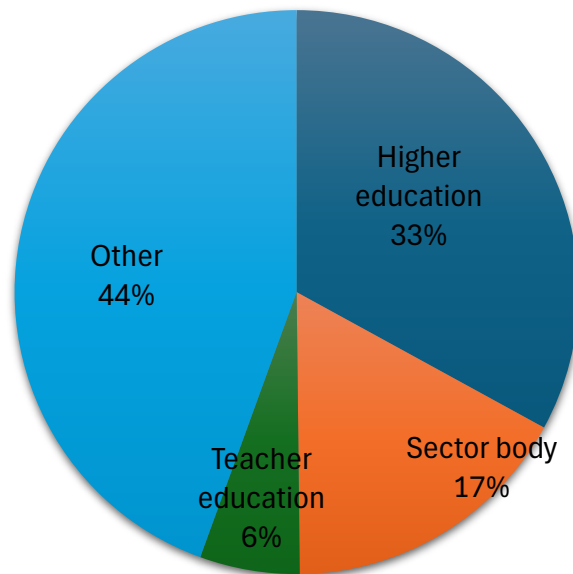
Figure 3 Organisational structures in apprenticeships



Source: NAO (2019), following ESFA (2017)

Not all End Point Assessment Organisations are regulated by Ofqual. The Government list of organisations listed 279 organisations; 92 were universities, 47 sector bodies (e.g. The Association of Chartered Certified Accountants), 16 were teacher involved in teacher education (e.g. Ark Teacher Training) and there were a range of other organisations such as Councils (e.g. Cornwall Council), military organisations (e.g. Royal Air Force), large and small awarding organisations (e.g. Scottish Qualifications Authority or Active IQ), colleges (e.g. South Devon College) and a large number of other organisations, largely engaged with sector-specific activities (e.g. MP Awards) (see Figure 4). The high number of universities registered reflects the shift to degree-level apprenticeships.

Figure 4 End Point Assessment Organisations



Source : DfE (2024)

2.2 Lack of understanding and knowledge of apprenticeship

Since 2017, Ofqual have commissioned surveys of the views of learners, providers, and employers on EPAs (approximately 500, 500 and 2,000 respectively are sampled each year). The format of the survey changed after the third wave in 2019, so two sets of trend data are available (2017 – 2019 and 2020 – 2022). Effects of the pandemic will be reflected in stakeholders' perceptions, as the conditions of education and assessment were affected by the restrictions put in place in 2020 and 2021. Formal assessments and examinations returned in 2022 but questions related to trust and knowledge of the EPAs are likely to be impacted by views of the qualifications leading up to the year in focus.

Focusing upon the findings referring to 2022 (Ofqual, 2023b), those employers who considered that they had a good understanding of apprenticeships in their sector (only 30%) rarely had a very good understanding of assessment (11%). Approximately 40% of learners did not have a good understanding of the assessments either. The most frequently cited reasons for learners taking apprenticeships were learning new skills on the job (50%), improving their skills (41%) and to progress in their current job (32%). Nearly two thirds of learners (63%) agreed that people who passed the EPAs had the competence and vocation and technical skills needed by employers. However, this proportion was lower amongst providers (55%) and lower still amongst employers (43%). One employer was quoted stating that 'they [EPAs] are neither necessary nor useful in our company.'

Only 44% of employers and providers reported valuing EPAs. The figure for learners was not high either, at 57%. These figures regarding valuing EPAs have remained reasonably consistent over the past four years of the survey.

Although the percentages had risen over time, a minority of respondents considered that EPAs were sufficiently flexible, whether they were employers (38%), providers (33%) or learners (46%). Half of the providers and 59% of learners agreed that learners understood the purpose of EPAs. A sizeable proportion of respondents ticked ‘don’t know’ or ‘neither agree nor disagree’ to the question regarding learner understanding of EPAs.

Comparing ratings of trust of EPAs and VTQs (Figure 5), we see that there is again a lot of volatility in the data, both between years and between stakeholder groups. This makes it difficult to draw general comparisons. Employers had the lowest percentage responding that EPAs and VTQs were trusted in 2020 and 2022, but in 2021 employers’ views of both indicated that they believed there was more trust. It is not clear whether this was due to the sample of respondents or social conditions at the time of data collection, since stakeholders may have had the need to support learners in mind when responding during the pandemic. In 2021, learners’ confidence that VTQs were trusted was extremely low, with only 26% of them rating that they believed they were trusted.

Figure 5 Percentages agreeing that the qualification is trusted: EPAs and VTQs



Note: Year refers to the conduct of the survey

Sources: Ofqual (2021, 2022, 2023b)

2.3 Broader perspectives from employers

Dickinson and Hogarth (2021) conducted a survey to examine the impact of apprenticeship reforms on employer behaviour. While the analysis focused on a wide range of reforms introduced in 2017, particularly the apprenticeship Levy, EPA was briefly discussed.

Dickinson and Hogarth pointed to mixed feelings from employers, stating that EPA was welcomed by some but not others. EPA was viewed as more of an issue in low-cost apprenticeships with the level of work involved in managing the process seen as a particularly daunting prospect: "...the work that went into the EPA was phenomenal" (Levy paying, low-cost employer LP_LC2) (2021, p.53).

In 2023, the Association of Employment and Learning Providers (AELP) conducted a survey on EPA to gain insight into the experiences of the sector in this area. There were 80 respondents from a range of provider types, sectors, and from a broad geographical area across England. The key findings were:

- 35% of respondents indicated that they pay between 11-15% of the total negotiated price (TNP) to End Point Assessment Organisations (EPAOs) with a further 25% paying between 16-20% of the TNP.
- The cost of resits/retakes beyond those included in the initial EPA cost is evenly split between Provider (43.7%) and Employer (47.5%).
- The wait for apprentices between gateway and EPA is most commonly 1-3 months (58.75%).
- Most respondents indicated that they "agree for some standards" (43.75%) that EPA availability has improved.
- 76.25% of respondent's standards have mandatory qualifications within the standard however, respondents were less clear regarding whether mandatory qualifications will affect the choice of EPA.
- 45% of respondents either disagree or strongly disagree that apprentices value the EPA element of their apprenticeship.
- Invigilation is identified as one of the most common additional costs which providers were not expecting to experience. This is particularly where EPAOs are conducting exams remotely and are insisting on providers using a paid for remote invigilator.
- Most withdrawals are due to apprentices achieving a mandatory qualification prior to EPA.

2.4 Stakeholder misalignments – academia-business, apprentice voice

EPAs were designed and introduced specifically to address the need for employer-driven assessments. Nonetheless, a lack of complete cultural alignment is inevitable between

commercial and educational environments. A small-scale study¹ was conducted on the views of supervisors and final year apprentices' views of end point assessments in public and private sectors (Pan & Reßin, 2022). The apprenticeships in question were Level 6 and 7 Digital and Technology Solutions Professional (DTSP) and Specialist (DTSS) degree apprenticeships taught at the University of West London. Whilst the specifics of the findings are related to the level and content of the apprenticeship, the themes of culture clashes arising from the data are likely to generalise to other cases:

- Academia-business goal misalignment:
The EPA project was not always seen as a part of business-as-usual work and sometimes referred to as 'university work.' This meant that it was not always supported by the employers or given priority. Instead, it could clash with the business needs of the employers.
- Gap between expectation and experience:
Apprentices' enthusiasm for the EPA project could be seriously affected by the lack of take-up of their recommendations or findings. This could affect motivation more generally, which implied a need for expectation management. Organisational constraints affect the impact of a project in any setting, and this is something that simply needs better management.
- External factors:
The real-world commercial environment meant that planned EPA projects could be difficult to conduct or complete. Factors such as businesses going bankrupt, redundancies or reliance on other projects for data meant that this could be fatal for EPA projects. More risk planning was suggested by the authors as a countermeasure.
- Confidentiality and commercial sensitivity:
Apprentices' capacity to demonstrate their knowledge and skills could be affected by the confidential nature of the data or technology. Non-disclosure agreements were not seen as a solution to these issues in a business context; rather they were seen as a sign of a problematic situation. Customer data or proprietary data were often needed for projects. This area appears to be particularly difficult to address. The authors suggested that GDPR (General Data Protection Regulation) requirements and commercial sensitivity could be considered at the beginning of the project, but this would not constitute a complete solution.

¹ The sample size is not given in the article.

2.5 Equality Issues

Since the apprenticeship reforms, DfE and BIS have investigated equality issues. The Equality Impact Assessment of Apprenticeship Reforms conducted in 2014 (BIS) reported no significant differences among different ethnic, age, gender, and students with learning disabilities groups in relation to seven elements of reformed apprenticeships. Despite the positive preliminary findings, the report showed that the percentage of White learners (89.4%) was overwhelmingly higher than other ethnic groups, for example Asian/Asian British (3.8%), Black/African/Caribbean/Black British (3.3%), Mixed/Multiple Ethnic Group (1.9%), and Other Ethnic Group (0.7%). However, the report primarily looked at statistics in 2012/2013 which makes it difficult to draw a convincing conclusion around equality issues within the reformed apprenticeship or EPA.

Although not specifically focused on EPA, a report by National Audit Office (NAO) (2019) provided more evidence on the participation in apprenticeships among learners from different ethnic, gender, socio-economic backgrounds as well as establishing key targets. These targets were criticised as lacking ambition (NAO, 2019; Cavaglia et al. 2022). The target for starts by BAME apprentices at 11.9% is lower than the working-age BAME population in England (14.9%), and much less than the proportion of BAME population at the end of key stage 4 (20.7%). The Department also sets no particular widening participation targets relating to gender equality, despite the notable under-representations of women in STEM apprenticeships.

It has been pointed out that the focus on starts, rather than completions obscures the inequality issues along the apprenticeship journey. There is a distinct lack of detailed evidence of apprentices' on-course experiences (although there are two active studies of this taking place – see Robson et al., 2024 and Gerwitz et al.'s study of post-16 transitions²). Importantly there is extremely limited understanding of students' experiences in relation to EPA and how it could benefit certain groups of students while disadvantaging others. Equity and EPA are under research.

3. Assessment in Practice: gateway, EPA, and grading

The Richard Review's (2012) call for end-point assessment represented a radical shift from the incremental completion of the Apprenticeship Certificate that was a feature of the previous apprenticeship frameworks. The intention was to capture the apprentices'

² <https://www.kcl.ac.uk/research/opportunity-equality-and-agency-in-englands-new-vet-landscape-a-longitudinal-study-of-post-16-transitions>

knowledge, skills, and behaviour (KSB) at the completion of the apprenticeship. The EPA would be based on synoptic and holistic assessments that would show what candidates were capable of at the completion of their programme. These assessments would be conducted by independent assessors, part of the complex regulation and quality assurance framework outlined previously.

The holistic approach to apprentices' KSB offers a more authentic assessment of competence, strengthening the validity of the assessment process. This is further secured by the Gateway process which establishes that the candidate has been suitably prepared and has met the prerequisites for EPA. There is also potential for a 'washback' effect from these authentic assessments into teaching and learning, offering what Biggs (1996) termed 'constructive alignment' between standards, instruction, and assessment. We have found no research on this relationship in the apprenticeship literature. However, experts have raised some concerns about the design and Implementation of this assessment framework, which we turn to below.

3.1 Concerns over a lack of ongoing or periodic assessment

A few authors raised concerns over the way in which the roll out of EPA in England led to the removal of all forms of ongoing assessment within apprenticeships (Unwin, 2017; Lillis & Varetto, 2020; MacKay, 2022). The Richard's Review presented a critique of ongoing assessment and argued that EPA would overcome inconsistencies in assessment practices and reduce the potential dangers of over-assessment. However, Lillis and Varetto (2020) argued that this critique failed to present meaningful evidence for the failure of ongoing assessment in work-based learning. As such, they argued that ongoing assessment has been removed arbitrarily from apprenticeship assessment and particularly point to health care contexts as an example of how these risks undermining learning opportunities associated with ongoing assessment approaches.

Unwin (2017) raised similar concerns about a lack of ongoing assessment alongside EPA. Through a series of international case studies where EPA is used (Alberta, Canada; Austria; Denmark; France; Germany; Switzerland; the Netherlands), she highlighted that while apprentices in all contexts are required to pass written examinations and tests of their practical competences at the end of their training, this always takes place alongside different forms of ongoing assessment, tailored to specific occupational contexts. No other countries rely solely on EPA in the way that England does (see Table 1).

Table 1 Assessment Procedures in selected countries

Assessment Procedures	Alberta Canada	Austria	Denmark	France	Germany	Switzerland	The Netherlands
Standards set solely by employers	X	X	X	X	X	X	X
EPA only	X	X	X	X	X	X	X
Qualification Awarded	✓	✓	✓	✓	✓	✓	✓
Regulated assessment bodies	✓	✓	✓	✓	✓	✓	✓
Independent assessment of competence	Trainer / Independent	Trainer / Independent	Trainer / Independent	Trainer / Independent	Trainer / Independent	Trainer / Independent	Trainer / Independent
Mandatory training for assessors and in-company trainers	X but CPD encouraged	✓	X	✓	✓	✓	X
Minimum legal duration of apprenticeship	2-5 years	2-4 years	3 years	3 years (+ foundation year)	2-3 years	3-4 years	2-3 years
Access to HE	Varies by occupation	✓	✓	✓	X	✓	✓

Source: Unwin (2017, p.30)

Unwin argued that England's current approach to EPA as a high stakes summative model, is a regressive move away from international trends in VET that focus on 'assessment for learning.' She argued that the model of learning in apprenticeships is necessarily based on supporting apprentices to develop through supervised practice and instruction over time. While end of apprenticeship 'test pieces' have long been a way of demonstrating skills and act as an important rite of passage, 'assessment for learning' approaches adopted by other countries promote learning through ongoing assessment (Unwin, 2017, p.7).

Concern around the removal of ongoing assessment through EPA reforms are similarly emphasised in an endorsement of Unwin's report from Gordon Marsden (Shadow Minister for Skills in 2017):

In the world of work ... individuals learn and hone their skills on a daily basis and are often assessed by their managers periodically, with reviews and opportunities to reflect and improve built into the process... Government must be aware that in some cases an EPA won't itself be sufficient to ensure that an individual is fully competent and knowledgeable. (Gordon Marsden MP, Shadow Minister for Skills, 2017)

Similarly, although focused solely on degree apprenticeships, MacKay (2022) echoed Unwin's concerns about a lack of meaningful ongoing assessment. She suggested that the

tension between England's approach to EPA and the model of learning inherent in apprenticeships could have a negative impact on teaching practice.

However, it is important to note that Unwin's commentary came out in 2017 and was focused primarily on proposed policy rather than actual practice. Assessment practice has developed into a more complex range of approaches and there are some potential opportunities for additional forms of assessment. The Gateway involves assessment. Where mandatory qualifications are included, assessment takes place (albeit in a similar time window to EPA; see IfATE, 2023). The situation is complexified by use of professional discussions which may involve discussing practical work. As such, the use of wider formative assessment practices across different apprenticeships requires further research.

3.2 Gateway – compliance and readiness

The function of the Gateway is for the employer, training provider, and apprentice to review the apprentice's 'knowledge, skills and behaviours to see if they have met the minimum requirements of the apprenticeship set out in the apprenticeship standard, and are ready to take the assessment' (ESFA, 2022). It is a qualifying review to allow entry to end-point assessment, the arrangements for which must be made shortly after its successful completion. *Gateway* is not a term found in the earlier policy reports (Richard, 2012; BIS, 2013, Sainsbury et al., 2016; Edge Foundation, 2019). Although it is usually treated as the formal review of readiness for the end-point assessment, the NCFE³ defined it as

the period of time between an apprentice completing their training and commencing their end-point assessment (EPA), during which the apprentice is asked to showcase the knowledge, skills, and behaviours (KSBs) that they've learned along the way.

One of the prerequisites of the Gateway is that an apprentice has received the stipulated 20% (6 hours a week) off-the-job training. Recent surveys suggest that around 38% (Field, 2023, p.5) of apprentices received less than the 20% off-the-job training required by law, so basic training requirements are being widely ignored or distorted – homework may be counted as off-the-job. As discussed above, Field (2021) raised the question of whether, in apprenticeship in England, the emphasis on assessment, as opposed to the quality of learning was right. He pointed out that England has, by international standards, a very relaxed system of quality assurance of apprenticeship learning and some of the basic regulations on the system are not enforced. The implication is that devoting more attention to this large gap in enforcement would yield much greater returns, in terms of the credibility of certification, than any plausible enhancement of the end-point assessment, where the

³ <https://www.ncfe.org.uk/all-articles/what-is-gateway-apprenticeship/>

outcome would presumably be marginal changes in the current 97.5% pass rate, for those who undertake an EPA.

It is at the Gateway review that work and assessments during the apprenticeship can be used to demonstrate that the standard has been fully met. These assessments do not carry over into the EPA, for example an EPA portfolio must be created *after* the gateway, though a pre-Gateway portfolio may be used as the basis for an EPA interview. Chewter (2018) quotes the guidance from IfATE:

Therefore, neither a portfolio of work nor a showcase completed during the apprenticeship can be used as assessment methods by themselves, and so cannot be individually weighted or contribute to the overall grade. However, they can be included in conjunction with another method of assessment, for example an interview about the portfolio. It is the interview only that will be assessed.

Chewter (2018) offers further clarification on the different perceptions of how portfolios can be used:

The guidance is clear – so why the confusion? It's largely historical: assessment plans designed in the earlier trailblazer phases pre-date this guidance and so different approaches were taken – until these earlier assessment plans come up for review, those conducting the end-point assessment (and those preparing apprentices for it) will need to work to the published assessment plan.

While there is copious information on the requirements of Gateway (for example provided on the ESCF and IfATE websites) we have not identified any specific research into its development or implementation. It is generally subsumed under end-point assessment. The literature thus points to complexity around Gateway processes and there is clearly a need for more research into the relationship between Gateway and EPA, not least to understand potential attrition at the Gateway stage.

3.3 EPA Methods: synoptic/holistic assessment

At the heart of EPA is the synoptic assessment of an apprenticeship's knowledge, skills, and behaviour. The EPA should involve at least two forms of assessment, one of them synoptic.

The terms holistic and synoptic 'seem to have merged' (Unwin, 2017), with synoptic now generally used in descriptions of the end-point assessment. The Richard Review (2012) used 'holistic assessment',²⁹ and states that 'It should be primarily at the end of an apprenticeship, not measuring progress during it' (p.8). BIS (2015) also used the term holistic: 'End-point assessment: a holistic assessment at the end of the apprenticeship to

test that the apprentice is fully occupationally competent in that role'. The BIS response (2013) to the Richard Review used the term synoptic: 'there will be a synoptic element to the end-point assessment, requiring the apprentice to identify and use effectively in an integrated way an appropriate selection of skills, techniques, concepts, theories, and knowledge from across their training'.

The final test and validation must be holistic, in that it seeks to test the full breadth of the relevant competencies not merely the incremental progression of the apprentice. That may take the form of a project or an assessment in front of an examiner. It should be performance and real world based, rather than just theoretical. It should be primarily at the end of an apprenticeship, not measuring progress during it. And the examiners should be neutral parties with no interest in the outcome, drawn from the ranks of employers as well as educators, since employers themselves are best able to assess what makes an apprentice employable. In this regard we can learn from our continental peers. (Richard, 2012, p.8)

Field was critical of current synoptic practices, but a theoretical commitment to synoptic assessment in apprenticeship, following the recommendations of the Richard Review, has weakened in practice. The government's stated plan following the Richard Review, was that

'synoptic, endpoint assessment means that an apprentice will need to be able to demonstrate the full range of skills, competency and knowledge required to meet the standard, putting different strands of learning together and applying these in different contexts' (Field, 2021, p.20).

However, in practice, end-point assessments just need to use at least one synoptic assessment method, such as work observation, to test some of the required skills, behaviours, and knowledge. This method of assessment can be applied separately, for example, to observe a technical skill and communication skills on two separate occasions. This is not synoptic assessment, which would involve, for example, an overall assessment of how someone handles a complaint from a customer about a technical malfunction of a product – a demanding task requiring the right blend of technical knowledge, tact, and communication skills. Ofqual's review of the quality of end-point assessment materials for apprenticeships makes no mention of synoptic assessment (Field, 2021).

He argued that one option would be

to require all assessment plans to set out explicitly how they aim to implement synoptic assessment. A final assessment project, as proposed in the Richard review, employed in many European countries, and already used in many apprenticeship EPAs, would be one means of standardising this routinely (Field, 2021, p. 23)

The Strategic Decision Network's (SDN) produced some information on the practice of EPA⁴ In the 208 published assessment plans, a total of 637 assessment methods had been deployed, around 2.8 per plan (Chewter, 2018). The breakdown is described in Table 2.

Without further analysis it is not possible to determine how the synoptic assessment of the EPAs was achieved, beyond using two or three separate approaches – though these cannot automatically guarantee holistic assessment. Further research is needed on *how* synoptic assessment is achieved in the EPA.

Table 2 Assessment Methods from SDN Under the Bonnet project
(<https://www.strategicdevelopmentnetwork.co.uk/reality-of-end-point-assessment/>)

Method	Total methods used	% of plans	% of total methods
Interview	120	58%	19%
Test or MCQ	116	56%	18%
Observation / Practical Assessment	103	50%	16%
Portfolio / Learner Log	97	47%	15%
Professional Discussion	84	40%	13%
Project	77	37%	12%
Showcase / Presentation	40	19%	6%
Standards with assessment plans	208		
Total assessment methods deployed	637	= 2.8 methods per plan	

3.4 Synoptic assessment and coverage

There is some ambiguity around whether synoptic assessment should cover all the standard's knowledge, skills, and behaviours (KSB)— suggesting a criterion-referenced mastery approach— or whether it should sample at a higher-order level that subsumes the lower-level SKB. MacAuthur, who along with Unwin and Field, is the only independent

⁴ <https://www.strategicdevelopmentnetwork.co.uk/the-project-epa-methods/>

writer to discuss synoptic assessment in detail, highlighted tensions between EPA and HEI (higher education institutions) approaches to assessment in clinical practice qualifications:

The "EPA marking criteria were unusual, in that they addressed the achievement of the KSBs in a binary way. They simply assess whether the evidence in the case study meets the criteria or does not— there is no judgement of how well a KSB has been met. To pass each part, the learner must have met all the KSBs in bold, as set out in the EPA assessment plan (Institute for Apprenticeships, 2018b) (p.39).

MacArthur also quoted the UK Quality Assurance Agency for Higher Education (Quality Assurance Agency for Higher Education (QAA), 2006) which defined a synoptic assessment as one that 'encourages students to combine elements of their learning from different parts of a programme and to show their accumulated knowledge and understanding of a topic or subject area'. She claimed that these types of assessment were not widely used in higher education in the UK but have been used in the US since the mid-1980s, where they are often called 'capstone modules' or 'projects' (Southall & Watson, 2016). These modules are a way of assessing a student's grasp of the whole syllabus. Synoptic assessments are currently a requirement for all academic and vocational qualifications in England that are counted in school and performance tables.

Unwin (2017) drew from the synoptic assessment plan for the Aerospace Manufacturing Fitter Apprenticeship Standard. Synoptic assessment should look to test skills and knowledge together, for example asking someone to demonstrate their ability to accurately build an engine to specification and quality criteria and asking them to explain why they are doing what they are doing as they build it (showing their knowledge and skill). Synoptic assessment should also focus on higher order skills, which give assurance of lower-level skills without requiring specific assessment. Her example is: 'the baker doesn't need to be assessed that they can use an oven if they are able to successfully bake a cake.'

Ofqual's 2020 technical evaluation of EPA material seems to send mixed messages about coverage. One of the weaknesses they found in EPA assessment plans was that 'not all Knowledge, Skills and Behaviours (KSBs) are covered.' They exemplified this from assessment guidance which showed:

- not all elements of the standard were covered, which could result in an apprentice passing a specific assessment without having demonstrated all the requirements set out in the assessment plan
- the criteria provided were not specific enough, which could lead to some criteria stipulated in the plan not being assessed. In one instance, "identify the knowledge, understanding and skills needed for your role" was used to cover several of the criteria from the assessment plan

- the language used was different from that used in the assessment plan, so it was not clear that all criteria from the plan were covered

This seems to imply that everything in an assessment must be directly covered rather than some of it being subsumed in higher order knowledge, and behaviour.

3.5 Fitness-for-purpose and threats to validity

Field's view is that the assessment framework focuses on the reliability of the processes, with less attention to the validity (fitness-for-purpose) of the assessment methods. While there is a strong focus on quality control around the EPA, it appears to be a 'rubber stamp' activity given that almost all (98 percent of) candidates pass. The pass rate is higher than in other countries – which also often include periodic assessments during the apprenticeship. Field also questioned how an open market in assessment, with multiple assessor agencies and four separate quality assurer agencies (including Ofqual), contributes to reliability and maintenance of standards. In fact, he argued that it risks a 'race to the bottom' (Field, 2023).

Field was more concerned with why 40-50 percent of trainees drop-out before the gateway and EPA assessments. His advice would be to 'fix the holes' in the lead up to any assessments, particularly the abuses of the 20% (six hours a week) 'off-the-job' training (which may not occur or may include homework, see above) and the lack of on-the-job training, something that is more rigorous internationally.

Part of Ofqual's apprenticeship remit is to monitor the quality of EPA. Their 2020 evaluation of EPA materials identified a range of shortcomings and potential weaknesses embedded in EPA practices. These were grouped into eight categories across apprenticeship standards and EPAOs. The most frequent issues, affecting over half the EPAs that were reviewed were:

1. Insufficient assessor guidance – unclear task requirements.
2. Insufficient assessor guidance – little or no exemplification of grading criteria or performance requirements.
3. General errors, contradictions, and inaccuracies in materials.

A further five issues, found in over a quarter of EPAs were (Ofqual, 2020):

1. Assessment or performance requirements differ from the assessment or grading criteria set out in the assessment plan.
2. Lack of clarity around the task requirements for the apprentice.
3. Not all Knowledge, Skills, and Behaviours (KSBs) are covered.
4. More than one correct answer in Multiple Choice Questions (MCQs).
5. EPA not meeting the requirements of the assessment plan .

3.6 These issues are fitness-for-purpose issues which may weaken the validity of EPAs if they hinder apprentices' ability to demonstrate their competence. However, apart from Field's and Ofqual's work, we were unable to find any other published literature on the reliability and validity of EPA. This is surprising given how long the reforms have been in practice and the amount of money spent on this qualification; it demonstrates a surprising absence of technical assessment discourse in apprenticeships and suggests lack of technical expertise in the sector. Grading

In England, grading technical assessments is now widely encouraged. Wolf (2011) argued for grading technical assessments (with marks above pass) as a means of supporting progress into further learning, while Richard (2012) proposed grading apprenticeships as a way of improving their signalling value to employers. Grading has now become government policy, with the aim of both motivating students to pursue excellence and allowing them to signal excellence to employers and education institutions:

We will introduce grading to Apprenticeships— pass, merit, and distinction. This granular but standardized approach to grading will encourage apprentices to strive for excellence and will maximise the usefulness of an Apprenticeship in the labour market. (BIS, 2013, p.5)

.... all new Apprenticeships will be graded, with apprentices who successfully complete being awarded either a pass, merit, or distinction. Grading will be applied to the full Apprenticeship standard. (BIS, 2013, p.17)

However, it is possible for a Trailblazer group to restrict grading to pass/fail where a case can be made for this. For example, the Lifting Technician occupation involves substantial risk and is safety critical – e.g., the errors of crane operation can have a detrimental effect on others.

Therefore, a high and consistent level of competence must be set as a minimum in order to ensure lifting operations, on all construction projects, are not compromised. The EPA will not be graded above a pass mark which will reflect the high benchmarked standard of competence and approach to health and safety that is expected. There will be limited allowance within the EPA assessment criteria. The knowledge test will allow for no more than one more opportunity to re-take if failed at first attempt. (Lifting Technician Level 2 Apprenticeship End-Point Assessment Plan, 2017).

This reflects the 'license to practice' pass/fail of other qualifications. Ofqual's review of apprenticeship assessment plans also revealed challenges around definition of process, grading, making decisions about aggregation, and approaches to re-takes and re-sits (2017).

Ofqual's statistics reveal that of the 363 standards reviewed, 27 had only pass/fail grading; none had pass/merit grading; 248 had pass/distinction grading and 88 operated with pass/merit/distinction. We have not found any commentary on how these grading systems were chosen and implemented, and their impact in terms of grade distributions and how these are understood. For example, the average percentage of Distinctions for

Pass/Distinction in 2022-3 was 38.2, for the Pass/Merit/Distinction system it was only 32.9 percent, a potential source of misinterpretation of achievement (Ofqual, 2023a).

In apprenticeship EPAs, proportions of merits and distinctions vary substantially across standards and between assessment bodies. For example, one assessment body awarded all 116 apprentices on one standard a distinction (IfATE, 2020).

A particular issue is how this grading approach aligns with Higher Education awarding on degree apprenticeship courses. MacAuthur (2023) raises some particular issues in relation to Advanced Clinical Practice qualifications:

A higher [apprenticeship] classification is given depending on how many of the non-bold KSBs have been met, as this tends to establish that the learner has provided a broader range of evidence or gone beyond the minimum standard expected. This style lends itself to a rubric-style checklist, as assessors can indicate whether the KSB has been met, not met, or (for the purposes of feedback) partially met. It is therefore necessary to ensure that all those involved in the assessment of learners are introduced to this rubric, even if they are experienced educators. Generating a numerical grade from the rubric has been a challenge for some HEIs, as pass/fail grades are not always permitted by local HEI regulations. (MacAuthur, 2023, p.39)

Turner and Low (2023) reported on a university-based social work degree apprenticeship. On this course the EPA was folded into the degree course and worth 60 of the 300 course credits and the EPA assessments, like the degree course, were also in terms of marks. The implication of these HE examples is that the apprenticeship assessment processes are having to become more flexible to align with HE procedures. Turner and Low could not locate any other literature on social work degree apprenticeships.

Conclusions

This review has found a surprising lack of rigorous research or commentary on apprenticeship EPA in England. The literature we identified consisted primarily of professional observations (e.g., Field, 2021 and 2023; Unwin, 2017), some quantitative reports aimed at specific stakeholder audiences and not usually explicitly focused on EPA (e.g., AELP, 2023), and some broader more general reports on apprenticeships e.g., NAO, 2019), as well as surveys of perceptions (e.g., Ofqual, 2023a). This illustrates an absence of significant, systematically produced evidence or primary research on EPA since the Richard Review and points to an urgent need for a wider programme of research into the policy and practice of EPA and the associated market-based structures that support its design and delivery. The evidence base and its omissions point to the following key issues.

Structures and Institutions

The structures and institutions that support EPA are complex and involve matters such as the setting of standards, and independent assessment. A key question concerns the status of completed apprenticeships and confusion around whether they can and should constitute formal qualifications. The commentary we found raised significant concerns around a model of apprenticeship and its assessment that, unlike other international systems, did not lead to formal qualification. These concerns were based on the view that formal qualifications enable individuals to move and progress in the labour market effectively and so underpin career flexibility. However, much of this commentary predated ongoing consultation and proposals by IfATE on the inclusion of mandatory qualifications, which include provision for mandatory qualifications if there's an evidenced need in the labour market or career progression in certain sectors requires specific qualifications. The potential for alignment between EPA and mandatory qualifications suggests a shift towards further flexibility, but we were unable to find relevant research on emerging practice and implications in this area. Additionally, the importance of qualifications and credentials are underpinned by data that suggests a key factor behind dropouts before EPA was apprentices gaining alternative qualifications.

A major concern, raised by several authors, was the lack of any ongoing or periodic assessment before the gateway process. The introduction of EPA in England deliberately removed the inclusion of any formalised ongoing assessment. This has potential negative implications for teaching and learning. Of all the countries that include EPA in their apprenticeship model, England is unique in not including other forms of assessment

throughout the training programme, although much of the commentary we found on this was based on early policy rather than current and emerging practice, which is likely to be more nuanced and include some elements of ongoing assessment (for example, when mandatory qualifications are included).

There was some suggestion that the institutional structures related to standard setting through IfATE and Trailblazer Groups foregrounded short term employer needs at the expense of apprentices' longer term career needs. This led to concerns about the implications for individuals seeking to navigate the labour market and develop transferable skills that would benefit them across their careers.

EPA is implicated in this focus on occupational specificity rather than a broader, skills-based approach taken by other countries. England is an international outlier in its adoption of over four hundred specific apprenticeship standards, far more than other well-regarded apprenticeship systems (Field, 2023).

EPA and the accompanying complex institutional structures were also highlighted as having potentially negative washback effects in teaching and learning. Although there was little detailed research on this, several authors highlighted the Richard Review reforms as leading to a culture that only valued EPA, meaning that discussion of curriculum design and pedagogy are largely absent from the sector and are not included in the regulation or analysis of the quality of provision. There also appears to be no central training of assessors. A key issue highlighted by the National Audit Office was the lack of attention paid to apprentices' off the job training entitlement.

EPA Practice

The literature we found brings together different stakeholder perspectives on assessment practice. Employers raised concerns around the costs associated with EPA and, in cases where professional bodies are also involved, questioned the added value of EPA. As mentioned above, some literature suggested misalignment between employer needs and apprentice needs. There also appear to be some tensions within degree-based apprenticeships between conventional university assessment and apprenticeship EPA. There is some suggestion that misalignment between the needs of different stakeholders underpins wider concerns around equity and equality issues in apprenticeships. However, the evidence in this area is limited and tends to focus on apprenticeship starts rather than experiences and outcomes.

Central to EPA is the requirement for synoptic assessment which captures the apprentices' integrated use of occupational knowledge, skills, and behaviour in a practical task. The limited evidence suggests this is not always the case in practice, with synoptic assessment being more narrowly interpreted and so less authentic.

There appear to be ambiguities in the policy literature about what is meant by 'coverage' in EPA, whether this involves comprehensive assessment of all the standard or whether higher order knowledge and skills can assume competence in its component lower order skills.

The requirement to grade apprenticeship has led to a variety of practices. There is little information about how grades are arrived at in specific standards and why particular grading systems were adopted. This may limit the inferences that can be drawn from a grade or summary data on them.

EPA Quality

Our review found little evidence or discussion on technical issues related to EPA, quality, standards, fairness, reliability, or validity. Field (2023), in his commentary on EPA, argued that the assessment framework focuses on reliability of the processes, with less attention of the validity (fitness for purpose) of the assessment methods. As such, he concluded that EPA is largely a 'rubber stamp exercise,' illustrated by the fact that 98% of candidates pass. Similarly, Ofqual's review of EPA materials identified several potential weaknesses that impacted on the quality of the assessment process. Potential weakness can also be linked to complexities around the process of standard setting and a lack of clarity around the process of grading.

Research Required

Since EPA has now been a core part of apprenticeships for more than a decade and involves significant ongoing expenditure, there is clearly a need for a rigorous review of both the policy and practice of EPA. Our searches illustrated the limited knowledge base and lack of comprehensive data for apprenticeships and EPA (for example, we found a number of differing statistical claims). Assessment in apprenticeships would benefit from focused research on the key issues above along with the development of rigorous, comprehensive and relevant datasets.

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Note: the nine documents generated from the systematic literature review are indicated with asterisk in the following reference list. Due to the multiple databases used for searches, these nine documents include academic, academic-related, and policy documents.

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