

Promote+Ed Positive change

Background and context

Promote-Ed and its subscriber base have come together to produce this document, which will support the discussions and issues facing the sector in terms of EPA during COVID-19.

This document is aimed Apprenticeships and Skills Minister, Gillian Keegan, with the view to making further positive change to the EPA process in the short-term, primarily to support learners and employers.

We are very aware that this is a complex matter, with nearly 600 Standards, each having different EPA requirements and models and an existing process for amendments to agreed procedures.

We acknowledge the work done by IFATE so far in its attempt to introduce flexibilities into some end-point assessments. The 75 end-point assessment plans that have so far been revised is a welcome step, but we feel that a more ambitious change to the way that end-point assessments are conducted, is required.

Our subscribers are repeatedly raising with us, both online, through our recent webinars and through one to one discussions, the adverse impact that the current EPA conditions are having, particularly in relation to learners. Many subscribers are reporting:

- Learners are dependent upon completion of their Apprenticeship to confirm long term employment contracts
- For many individuals, it is a condition of their employment contracts for either or both promotion and pay increases to achieve a successful completion of their Apprenticeship
- The failure to complete the EPA process results in delays for learners in terms of progressions
- There is a severe risk of high withdrawals at the latter point of a programme where a learner has achieved an underpinning qualification, but the EPA process is slowing down the achievement of the Apprenticeship.



Introduction

We are sure you will have heard many of these arguments. Our subscribers believe there is a real danger to the reputation of the Apprenticeship brand if the delays presently being experienced allow this to exacerbate over the next few weeks and months.

We have therefore, in the spirit of positivity, identified 5 key points or milestones that should be considered by IfATE with some urgency which could address all of the above issues.. Our 5 point plan would be a TEMPORARY measure, limited to EPA processes to be completed up until the 30th November..

As we have said, we acknowledge positive change has already been made . EPAO's can now utilise remote technology to perform the End-Point Assessment.

However, there is a danger that this is creating an inequitable mix of End-Point Assessment approaches, removing the learner from the very heart of the process, and allowing some learners to progress, whilst others cannot.

Furthermore, this could create a socio-economic inequality due to the differing access learners have to IT equipment, as well as inequality within the apprenticeship End-Point Assessment approach due to the differing stances taken by EPAO's. An example of this is the Assistant Accountant Apprenticeship where the approach taken by the EPAO is non-negotiable resulting in significant delays to achievements and progressions for learners.

Learners due to take assessments for Functional Skills qualifications before the end of the summer can now receive a calculated result, which is a welcome step.. This will then ensure apprentices reaching Gateway and need their functional skills will be able to meet the Apprenticeships Assessment Plan for Functional Skills. However, given the concerns surrounding EPA, there will now be learners waiting many months before being able to compete their full EPA requirements, especially in sectors where the return to normal working is likely to be several months away (eg Hospitality).

In the 24th April guidance the ESFA have relaxed the rule requiring Level 2 apprentices to study towards, and attempt, the Functional Skills assessments at level 2 which is "suspended temporarily" and will be reviewed in July. This now allows apprentices and providers to focus on the other key requirements for completion of a Level 2 apprenticeship. This once again is incredibly positive, whereby apprentices who are due to take their EPA up until 31st July 2020 can enter the Gateway to perform their EPA without the need to attempt the Level 2 Functional Skills English and maths assessment.

All of these points regarding Functional Skills are positive for the apprenticeship sector. However, this does further exacerbate the number of learners awaiting completion of their EPA where the position is not consistent or indeed positive.

The role of the employer is of the up most important in this whole process and we believe that they should be used more effectively to support successful EPA in the short term through for example a situation where the apprentices employer could add a validation statement (witness testimony or expert witness testimony in some cases) to ensure they are fully happy for complete sign-off. The employer is key to knowing the competence of their staff and therefore a role in sign off would be valuable.

We are therefore suggesting a 5 point plan.



The 5 Point Plan

The following sets out our 5 point plan.

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We understand that the EPAO has to gain approval from their EQA who subsequently needs to gain approval from the IfATE and Trailblazer group.

This process takes considerable time to filter through to the learner waiting for their EPA, who is disadvantaged. As the IfATE have published guidance regarding a sensible approach to adapting EPA assessments, we are asking why the process has to trickle through a bureaucratic process and cannot be applied directly by the EPA?

We would recommend the EPAO be allowed to adopt the IfATE guidance and to ensure they don't have to follow an elongated bureaucratic process that is disadvantaging learners to achieve their apprenticeship.

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Some Assessment Plans require observations to be conducted by external assessors, these observations are not taking place currently and in many cases not being conducted on-line, thereby disadvantaging learners who are at Gateway and have been at Gateway for a long-time:

We recommend the observation element of the EPA be removed or revised, for example using the mock assessment result augmented by scenario based questions from the assessor,

We also recommend the observation element be performed through a different assessment method.



The re-ordering of some of the methods of assessment by the IfATE is positive (for example - on-line tests or professional discussions can be taken now and the observation delivered later), however, where other assessment methods have been completed but the apprentice still can't complete the observation part as certain EPAO's are not utilising technology.

We feel strongly that the apprentice should be at the very heart of the process, especially at this difficult time., We therefore recommend that the Employer can easily and quickly move EPAO where the already selected EPAO is not utilising technology or is putting restrictions in-place.



Where learners are furloughed and do not have access to IT equipment or do not have access to the Internet at home, we are looking to ensure EPA can still take place by the EPAO's where potentially the apprentice can attend their workplace place (if open) and carry out the observation on a simulated activity. If the workplace is closed, then we would encourage the training provider to facilitate appropriate premises to allow the assessment to take place.

Simulated Assessment has been around for many years, and especially within the use of a realistic working environment' (RWE). In such instances, EPAO's must counter the balance against the unprecedented times we are in and allow for simulation to take place, and not to disadvantage apprentices due to circumstances outside of everyone's control.

With this it is important that the EQA's and IfATE allow EPAO's (that have gone through a stringent quality process to be on the approved Register of End-Point Assessment Organisations) to be flexible and have the ability to use alternative simulated environments.



As part of the 4 points above, and as already mentioned, the employer should play an important role in determining the competence of 'their' apprentice.

We are therefore recommending that as an additional assurance where one or more assessment methods have been changed, the employer can be interviewed by the EPAO to enable clear sign-off of the KSB's and the apprentice's competence to perform whilst at work.

Benefits of the Plan

These rapid adjustments will further enhance a system where in these unprecedented times apprentices are not disadvantaged, as mentioned above, and will also ensure that we have a 'level playing field' for all apprentices to complete (and not of a system whereby we seem to have created through these unprecedented times an inequality in the achievement of apprenticeships.

The reputational damage to apprenticeships could be catastrophic in the long-term, where apprentices are not achieving through a process that is not flexing enough in times that are unprecedented and these apprentices and employers are the beacon of light for apprenticeships.

Consultation

We have taken the opportunity to consult with a small number of EPAO's of this proposal. On all occasions, they are wholly supportive of it and believe it will provide a significant positive contribution to supporting learners over the next six months, accepting this is to be only a temporary measure through these unprecedented times and to ensure no apprentice is disadvantaged.



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