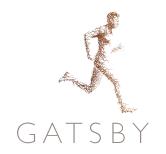
# RESEARCH REPORT: APPRENTICESHIP COMPLETION, EPA AND THE ROLE OF EMPLOYERS

A REPORT TO THE GATSBY FOUNDATION

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August 2024



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BY DAVID SAINSBURY

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CAN BE ACHIEVED BY SHORT, ONE-OFF
PROJECTS. WE ARE ALWAYS EAGER TO FORM
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## **ACKNOWLEDGEMENTS**

The authors are grateful to the Gatsby Charitable Foundation for their support of this work, and to Jenifer Burden and Daniel Sandford Smith for their guidance throughout the project. The authors would also like to thank all the interview participants, as well as Helen Cuthbert, Simon Ashworth and Chihiro Kobayashi at the Association of Employment and Learning Providers (AELP) for help with sharing information about the project.

# **DISCLAIMER**

The views and opinions expressed in this report are those of the author and do not necessarily state or reflect those of the Gatsby Charitable Foundation.

# **EXECUTIVE SUMMARY**

Reforms to apprenticeships implemented over the past decade have included a gradual transition from apprenticeship frameworks to standards. All the standards include a final summative assessment in the form of an end-point assessment (EPA). EPA was introduced primarily to ensure that apprentices underwent an independent, comprehensive, holistic assessment of their occupational competence at the end of their apprenticeship.

The transition from frameworks to standards has been accompanied by a decline in apprenticeship achievement, this is due to a combination of reasons. Currently, barely half (54%) of all apprentices reach EPA and complete their programme. The Department for Education (DfE) has set a target for two-thirds of apprentices to successfully complete by 2024/25, and they are scrutinising and challenging providers to improve their achievement rates.

Employers and learners have a pivotal role to play in increasing apprenticeship achievement rates. Following discussions with Gatsby, the technical education consultancy, Think, submitted a research proposal in summer 2023 to explore the roles of employers and learners in successful EPA completion. The agreed proposal had four main objectives:

- To understand whether EPA contributes to low achievement rates, and if so, which standards are affected.
- If EPA is a factor for some standards, to understand the extent to which the employer and/or the apprentice and/or the provider contribute to apprentices leaving prematurely.
- To understand why the employer, apprentice and/or provider may allow non-completion.
- To make recommendations on what could be done in response.

Extensive desk-based analysis of apprenticeship delivery data, including information obtained through a freedom of information (FOI) request submitted with the cooperation of DfE, enabled the identification of a shortlist of standards for further research. These standards all featured a high proportion of leavers who dropped out shortly before or after their planned end date, having completed the bulk of their learning programme.

We used this dataset to develop a set of draft hypotheses for the factors that lead apprentices to withdraw shortly before EPA, and the roles that employers and learners play in them. This work informed further lines of enquiry that were explored in an extended programme of engagement with providers and employers from late 2023 into 2024, during which more evidence was collected. Our research covered 15 standards, about which we carried out interviews with 50 providers and 71 employers as well as a small number of interviews with current and recent apprentices.

Interview feedback indicated that most employers provided good support to ensure that apprentices could complete their programmes, and that both employers and apprentices valued EPA as a high-quality, consistent and independent test of occupational competence. However several issues were identified that help

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explain why some standards, including several with high learner volumes, have high levels of apprentice withdrawals shortly before EPA. Specifically that:

- In some standards, employers and learners often considered a mandatory qualification to be more valuable than the EPA. There were also concerns about potential duplication between the continuous assessment used to prepare for EPA and the formative assessment used for mandatory qualifications.
- The functional skills requirements were challenging for some apprentices to achieve, which resulted in late withdrawals and a decrease in the number of people willing or able to start an apprenticeship.
- In some cases, employers used apprenticeships for career development and skills add-ons, rather than as initial training or training before, or at the point of, promotion. In these circumstances, the learner often has little to lose by withdrawing from the apprenticeship.

Analysis of this evidence identified a series of findings, from which nine recommendations have been made that would improve employer and apprentice engagement in EPA. They include:

- DfE should develop a long-term vision for EPA that includes its use outside of apprenticeships.
- The Institute for Apprenticeships and Technical Education (IfATE) should review the status of apprenticeships that are not used for initial training or before, or at the point of, promotion. These are the standards that have higher levels of non-completers who withdraw shortly before EPA.
- The relationship between the formative/continuous assessment required for mandatory qualifications and for EPA should be decided nationally by IfATE rather than it being left for providers to work out. If employers in a trailblazer group want a mandatory qualification, they should identify the specific knowledge, skills and behaviours (KSBs) it delivers to minimise the duplication in formative/continuous assessments and/or portfolio building.
- DfE, the Office of Qualifications and Examinations Regulation (Ofqual) and IfATE should routinely publish data showing by standard the proportion of leavers who withdraw from their apprenticeship shortly before EPA, and data on the achievement of mandatory qualifications by apprentices.
- Apprenticeship standards should specify the maths and English requirements linked to the KSBs, similar to the way they are mapped in T Levels. All apprentices should have to meet these requirements. The functional skills policy for young people should be aligned with T Level policy, meaning that continued development wider than the standard carries on, but that no specific level needs to be achieved (as is the case for T Levels and full time FE). Adults should only have to achieve the maths and English required by the standard.

# INTRODUCTION

#### **BACKGROUND**

The past decade has seen wholesale reform of the funding and delivery of apprenticeships. This has included a gradual transition from a set of around 250 apprenticeship frameworks to nearly 700 occupational standards.

All the standards include a final summative assessment in the form of an end-point assessment (EPA). EPA was introduced primarily to ensure that apprentices underwent an independent, comprehensive and holistic assessment of their occupational competence at the end of their apprenticeship. The summative EPA was a response to long-standing employer feedback about the continuous assessments previously used for apprenticeship frameworks. These were based on assessing separate components of the qualification, which were 'ticked off' over the course of the training. It was therefore felt that apprentices were not truly occupationally competent at the end of their apprenticeships because there was no holistic and comprehensive test.

However, there are a number of problems with EPA, as illustrated in the following scenarios:

- If apprentices leave part way through their training, there is a risk they will not receive any credits for what they have achieved up to that point. In this scenario, leaving may not be the apprentice's choice, for instance, they may have been made redundant.
- An apprentice can drop out of their apprenticeship before EPA but keep their job. For instance, the employer and/or the apprentice have decided that there is no need for the apprenticeship, and therefore EPA, to be completed because either or both are happy that the training to date has been enough for job competence, although it is likely not enough for occupational competence.
- Many apprenticeships include mandatory qualifications that are compulsory
  parts of the standard. If they are recognised as accreditation by employers and/
  or apprentices and are taken before the EPA, there is less incentive to take
  the EPA. This is a particular problem if the mandatory qualification accredits
  occupational competence, and therefore duplicates the EPA, and/or is a licence
  to practice. It is less of a problem if the mandatory qualification is simply a
  contributory component of the apprenticeship, such as a knowledge qualification
  or technical certificate.
- EPA is a high-stakes assessment for the apprentice, employer and provider. This means that employers and providers must be sure that an apprentice is ready. For apprentices this can lead to nervousness and even a reluctance to complete the assessment. All three parties tend to want to revise what has been learnt during the whole apprenticeship to prepare for EPA.
- EPA is, at least in part, an additional cost because continuous assessment is used for component qualifications as well as for preparation for the EPA.

- It is difficult to devise EPA assessments that test true occupational competence at the same time as keeping costs down. It has also proved difficult to devise EPA that does not rely on evidence gathering and continuous assessment during training. This also means it is difficult to use EPA to assess non-apprentices.
- EPA itself needs to be quality assured externally in both design (to ensure validity) and consistent delivery (to ensure reliability). This can be difficult and costly.

The initial stages of EPA implementation were characterised by several operational problems. EPA was not always in place when apprentices needed it or was not in place early enough in the apprenticeship for all parties to properly prepare for it. Some of these early problems seem to have returned recently because of staff shortages.

Some combination of the issues outlined above contributed to low achievement rates in the early days of implementation and they seem to have persisted. The Covid-19 pandemic caused significant disruption, which meant many apprentices were unable to continue or complete their training as planned. Another factor is that some standards are relatively new and have not been in place long enough for there to have been a consistent year-on-year achievement rate trend.

#### PURPOSE OF THIS RESEARCH

There continue to be some apprenticeship standards with low overall achievement rates, which weakens the national average apprenticeship achievement rate (54.3% in 2022/23, a modest increase on 51.4% in 2021/22 and 51.8% in 2020/21) and is well below the ministerial target of a minimum 67% by 2024/25. Many apprenticeship standards have average achievement rates well below 50%, including those standards that have significant numbers of learners starting each year.

The Department for Education (DfE) has carried out extensive work to understand the reasons for low apprenticeship achievement levels, however discussions with Gatsby identified an opportunity to explore the role of EPA in apprenticeship non-completion and specifically the part played by employers and learners.

The objectives agreed for this project were:

- To understand whether EPA contributes to low achievement rates, and if so, which standards are affected.
- If EPA is a factor for some standards, to understand the extent to which the employer and/or the apprentice and/or the provider contribute to apprentices leaving prematurely.
- To understand why the employer, apprentice and/or provider may allow non-completion.
- To make recommendations on what could be done in response.

# **METHODOLOGY**

Project delivery was built around three main stages of evidence gathering.

## STAGE I: DESK-BASED DATA REVIEW

The project team conducted extensive desk-based data analysis to identify the standards and the providers that could give insights into the role of employers in EPA.

Current DfE national apprenticeship data identifies the retention rate, pass rate and achievement rate for each apprenticeship standard. This data shows that the largest determinant of a standard's achievement rate is its retention rate. For the majority of standards, very few apprentices who have passed the gateway, drop out, fail their EPA or resit.

There is no publicly available data that tells us whether a standard's low retention rate is caused, at least in part, by learners leaving shortly before EPA having completed or nearly completed their training programme, which would indicate a potential issue with the non-completion of EPA. Following a Freedom of Information (FOI) Act request in summer 2023, DfE provided the project team with data for each standard with more than 50 leavers in the academic year. The data showed:

- the proportion of learners who left their apprenticeship without completing it within the three months before their planned end date in the 2021/22 academic year
- the proportion of learners who left their apprenticeship without completing it after the learner's planned end date in the 2021/22 academic year

The data enabled us to identify which standards had high proportions of apprentices leaving late in their apprenticeship. Published DfE data of apprenticeship starts was then used to supplement this information. For each standard we identified the proportion of apprentices employed by levy paying employers and the proportion who started their apprenticeship within three months of being employed, which indicated whether employers were using the apprenticeship to recruit to a vacancy or to develop existing staff.

I The gateway is a review that takes place after training and before the EPA. Gateway requirements are set out in the apprenticeship standard. During gateway, the employer and training provider make sure all mandatory elements of the apprenticeship are completed. They also review the apprentices KSBs to make sure they are ready to take their EPA. If ATE (accessed 2024) Preparation for End-Point Assessment — Gateway and Start of the End-Point Assessment

#### STAGE 2: PROVIDER ENGAGEMENT

The focus of the project was employers and learners, however DfE only publishes data on apprenticeship providers, not employers. We therefore had to approach employers through the providers that we knew had apprenticeship starts in the standards that we had prioritised for the research. To maximise our chances of connecting with employers, we began by approaching providers with higher numbers of starts per standard and asking them to participate in this research. This involved:

- arranging a semi-structured interview with the provider, either with one manager and one member of operational apprenticeship staff, or with two operational staff members if preferred
- the providers introducing us to a number of the employers they worked with to deliver the relevant standard

At least two providers per standard were selected for interview so we could understand why they thought apprentices within the specific standard were dropping out shortly before or after their planned end date. We explored the following themes with providers:

- the range of possible causes of dropout close to EPA, as established during the stage I analysis
- views on both EPA and the reasons for any dropouts
- employer and provider attitudes to EPA
- feedback on apprentices' attitudes to EPA
- the role of the employer, provider and end-point assessment organisation (EPAO) in EPA completion
- information on the mechanics of EPA, such as procedural problems, costs etc.
- how employers use the apprenticeship, is it used to recruit and train, or to develop existing staff?
- the role of qualifications as part of the apprenticeship
- functional skills requirements

The full list of questions is detailed in Annex 3: Interview lines of enquiry.

The project team used trusted intermediaries (including the Association of Employment and Learning Providers, which had recently undertaken its own survey about EPA) to maximise our response rate. We also offered employers and providers anonymity in the final report. For most of the relevant standards, the response rate was acceptable, but a significant amount of briefing and follow-up work was needed to secure interviews. Larger providers tended to be more willing to participate in our research, which made it more challenging to investigate some standards because the key providers were smaller. In total, the project team conducted 50 interviews with 17 different providers covering all the standards that we reviewed.

# STAGE 3: EMPLOYER ENGAGEMENT

The project team asked each provider to introduce them to a sample of employers we could conduct semi-structured interviews with. The lines of enquiry for these discussions were agreed with Gatsby in advance (see Annex 3: Interview lines of enquiry) and were informed by the emerging findings from stage I and stage 2 of the project.

However, out of the 17 providers (not employer training providers) we interviewed, only five referred us to employers. For some, this was because none of their employer clients wanted to take part in the research, for others the provider did not want to engage beyond their initial interview with us. Instead we used local and national channels to reach employers, most notably the National Apprenticeship Service's apprenticeship ambassador network, whose members champion the use of apprenticeships.

A total of 71 employer interviews took place with 25 different organisations. A handful of employers were also happy for us to ask current or recent apprentices about their views on EPA.

A clear majority of the employers who participated in our research were larger organisations, which tend to have the capacity to manage apprenticeships, support line managers and scrutinise provider performance. We did find some smaller employers who were successfully integrating apprenticeships into their business operations, but the large organisation-bias of our evidence should be noted. As with our provider interviews, we sought to interview operationally relevant employer roles who were directly involved with the standards.

# EVIDENCE: DESK-BASED DATA REVIEW

# INITIAL ANALYSIS OF ROUTES AND STANDARDS AND SELECTION FOR FURTHER WORK

Analysis of the data from DfE datasets and the information received through the FOI request showed:

- Ninety-two standards had at least 30% of leavers who dropped out shortly before or after their planned end date. This is summarised as the sum of pre-EPA leavers (SPEPAL).
- The percentage of non-completing leavers who dropped out shortly before or after their planned end date ranged from a high of 89% (for nursing associates) to a low of 0%.
- The standard with the highest proportion of non-completing learners leaving during the three months before their planned end date (excluding those with single digit numbers of leavers) was the train driver: 40% of its 268 non-completers in 2021/22 left during the three months before their end date.
- The standard with the highest proportion of non-completing learners leaving after their planned end date was the nursing associate (71% of 28 leavers) followed by the public service operational delivery officer (58% of 599 leavers).
- The Legal, Financial and Accounting route had the highest number of standards with more than 30% of non-completers leaving during the three months before or after their planned end date (17 of 26 standards). This was followed by Business and Administration (14 of 30 standards). By comparison, Engineering and Manufacturing had only 5 of 40 standards with more than 30% of non-completers leaving during the three months before or after their planned end date.

Further analysis was carried out on how employers were using these standards, based on available DfE apprenticeship starts data. This showed, for example, the proportion of starts funded by levy funds and the prior duration of employment of learners, which gave an indication of whether employers were using the standard for new recruits or for existing staff. From this, two further observations were made:

- Most apprenticeship starts on standards with high levels of leavers dropping out either shortly before or after their planned end date, were funded by levy paying employers. Ten of the 15 standards with the highest levels had more than 90% of starts funded by levy paying employers.
- The differences in the number of leavers dropping out either shortly before or after their planned end date on different routes could have been influenced by how employers used apprenticeships. For example, most Engineering and Manufacturing standards were used as initial training, with a high proportion of learners having been employed for less than three months before starting. The reverse is true in the Business and Administration route.

To produce a shortlist of standards to investigate, the project team excluded approximately 25% of the 92 standards with SPEPAL at 30% or above, because the actual number of leavers was very low. This left 74 standards, which was reduced to 46 by removing standards that had since been retired, were new or were very similar in structure and focus to other standards in their route.

The Annex 2: FOI and subsequent analysis spreadsheet shows that 74 standards were marked as candidates for further research (column E) and 44 were marked as proposed for possible further work (column D). Following a review with Gatsby, two further standards were added to this longlist (adult care worker and hospitality supervisor). The resulting 46 standards were divided into two potential research sets and it was agreed that work would focus on 15 of the standards in the first set, as shown in Table 1.

# DRAFT HYPOTHESES: POSSIBLE REASONS FOR HIGH WITHDRAWALS CLOSE TO EPA

The project team developed a series of hypotheses of the possible drivers for high rates of learners leaving before EPA. They were based on the available data and a desktop review of the design and content of each standard and its assessment plan. The drivers depend on the standard.

- Where mandatory qualifications and EPA are not an integrated 'single event', learners and employers may value the mandatory qualifications more than the apprenticeship completion, which can lead to learners dropping out shortly before EPA.
- The standard does not represent an occupation but can be used by employers as an add-on to other occupations, such as associate project manager and improvement practitioner. In such cases, the training programme may be the most important element, while the occupational qualification/EPA may provide little benefit for either the employer or apprentice.
- The standard does not represent an occupation but it is used by employers to define a job that has no wider currency in the labour market, such as dual fuel meter installer. Because the employer after the apprenticeship is the same as before and there are few alternative employers, it is easy for the employer to discount the need for EPA without facing objections from apprentices.
- Instead of using the standard for initial training or promotion, it is used by employers as workforce development for staff already in, and planning to remain in, the occupation. The motivation is only to complete the apprenticeship training not to complete the EPA this could apply to a large number of standards. In some circumstances the reverse could be true, for example if regulatory changes require staff to be qualified in some way, then employers will be interested in the EPA if it is the qualification or is integrated with the qualification.
- In some cases, staff may already be largely competent when they start the apprenticeship, such as in supervisory and management standards.

- The standard is not driven by employers but instead is used by staff for their own personal development, one such possible standard is advanced carpentry and joinery. So, for example, a level 3 standard taken by those in a level 2 occupation could shift the standard from being employer- to learner-directed.
- If the apprentice has to invest significant effort into the training, but the employer does not see the EPA as valuable, then the apprentice may be willing to take part in training but not willing to complete the gateway/EPA unless it is actually required by their employer.
- Standards that attract very highly motivated applicants but rarely lead to well-paid careers in the short term may lead to some employers essentially exploiting the apprentice minimum wage requirements. In these circumstances the employer's motivation for their apprentices to complete the EPA could be low and the apprentice's motivation will depend on the value of the EPA/qualification.
- Where an employer's culture is about learning for staff who seek development for future careers (e.g. NHS, health and the civil service). This could mean less motivated line managers because they stand to lose their staff member.
- Any of the above drivers can be exacerbated by any employer attempting to pay lower wages to apprentices and/or to maximise use of their levy.
- The push to create a specific standard could come from large employers who want to monetise their learning and development function more widely than apprenticeship design would otherwise allow.

These initial hypotheses informed the development of the lines of enquiry used in the interviews with providers and employers to assess whether EPA was the main cause of dropout after training but *before* gateway and if so, why (see Annex 3. Interview lines of enquiry).

# EVIDENCE: PROVIDER AND EMPLOYER INTERVIEWS

# PROVIDER SELECTION

Having clarified which standards would be the focus of the research, the project team reviewed apprenticeship starts and achievement rates data to select which providers to approach.

Table 1. Provider achievement rates for standards (first set for interview)<sup>2</sup>

	1	2	3	4	5	6	7	8
Standard	Providers with 10 or < 10 leavers	Providers with >20 leavers	Low AR <50%	Low AR >50%	Pass Rate <95%	Comments on larger providers	Overall AR: 21/22 (%)	Overall AR: 22/23 (%)
Associate project manager	81	17	8	9	I	Majority of large providers had low achievement rates (AR)	40.1	42.3
HR consultant partner (now people professional)	81	18	4	14	6	Biggest providers had low ARs	44.6	36.2
HR support	122	15	3	12	2	Largest provider had low AR	55.3	58.7
Improvement practitioner	33	10	5	4	nil	-	39.6	46.2
Improvement specialist	14	3	1	1	nil	-	19.3	33.3
Improvement technician	30	13	5	3	I	Largest providers had low ARs	29.9	28.6
Operations or departmental manager	268	143	61	71	2	More large providers had low ARs	47.5	51.2
Team leader or supervisor	351	180	56	102	10	-	49.1	54
Adult care worker	183	122	73	36	4	-	40.1	39.6
Advanced carpentry & joinery (now craft carpentry & joinery)	108	12	nil	12	3	-	68.2	69.8
Lean manufacturing operative	44	12	I	7	nil	Generally good ARs	42.7	54.3
Engineering operative	76	7	3	2	I	-	35.6	54.5
Healthcare support worker	51	27	2	23	I	Two big providers had low ARs	56.6	58.4
Senior healthcare support worker	75	36	П	25	nil	One large provider had low AR	52.9	50.2
Community sport and health officer	22	5	2	2	nil	Half and half low/high ARs	38	-

<sup>2</sup> When viewing Table 1, the following column definitions apply:

Column 1: Number of providers that had 10 or less, or 'low' numbers of apprentice leavers

Column 2: Number of providers that had 20 or more apprentice leavers

Column 3: Number of providers from column 2 whose achievement rate (AR) was less than 50%

Column 4: Number of providers from column 2 whose achievement rate was more than 50%

Column 5: Number of providers from column 2 whose dropout after gateway was more than 5%

Column 6: Comments on the mix of ARs below and above 50%

Column 7:The national achievement rate for 2021/22

Column 8:The national achievement rate for 2022/23

Table 2 shows the number of employer and provider interviews carried out by the project team.

Table 2. Number of interviews held with providers and employers.

STANDARDS	NO. OF PROVIDER INTERVIEWS HELD	NO. OF EMPLOYER INTERVIEWS HELD
Associate project manager	3	5
HR consultant partner	4	9
HR support	6	6
Improvement practitioner	3	7
Improvement specialist	2	5
Improvement technician	I	6
Operations or departmental manager	6	9
Team leader or supervisor	5	7
Adult care worker	I	5
Advanced carpentry and joinery	2	I
Lean manufacturing operative	5	2
Engineering operative	4	I
Healthcare support worker	3	3
Senior healthcare support worker	4	3
Community sport and health officer	0	I
Total number of interviews	50	71
Total number of providers and employers interviewed	17	25

# EVIDENCE: PROVIDER AND EMPLOYER FEEDBACK BY ROUTE AND STANDARD

The feedback from employers and providers was consistent with several of the draft hypotheses developed by the project team. We found that both employers and providers showed a good level of commitment to EPA, but that this varied depending on the standard, specifically on whether it included a non-integrated mandatory qualification, and on the employer's purpose for using the apprenticeship.

The following are the key themes that emerged from the interviews with employers and providers about EPA and the reasons that learners may have been dropping out late in their programmes. For more detailed feedback on each of the 15 standards reviewed, see Annex 1: Review of the standards per route.

# Support for learners to complete their apprenticeship

Feedback indicated that the clear majority of employers took significant steps to ensure that apprentices passed gateway and successfully completed EPA. This typically included some or all of the following:

• Communication between all parties (learner, employer and provider) about the importance of the EPA early in the programme. This included information about the focus and content of the EPA, so that the process of EPA, and the requirements to pass it, were understood from the beginning.

- Employers providing additional support to learners so they could develop portfolios of evidence which are often required for EPA, and could prepare for the EPA itself. This often included giving post-gateway learners time at home to prepare for EPA, in the same way a learner would revise for an exam.
- Internal communication in the employer organisation celebrating EPA achievements, which elevated the status of the apprenticeship and EPA among colleagues.

Interview feedback indicated that line managers generally provided good support to their staff taking apprenticeships. There were frequent examples of line managers, whose departments were particularly busy, needing to be convinced to support a colleague through their apprenticeship. However, employers had put in place various methods of supporting and encouraging their line managers to behave positively.

# Employer and learner attitudes to EPA

Nearly all the employers we spoke with said they highly valued the EPA and this view was supported by our consultations with providers. However (as noted below) this was not the case when the apprenticeship included a competing mandatory qualification.

Employers particularly valued that the EPAO was independent from the training provider and liked the idea of the assessment being delivered by what they saw as a visiting expert. In the main, employers felt that EPAOs were delivering good-quality and consistent assessments of competence.

Employers also reported that apprentices took EPA very seriously and many could provide examples of their anxiety and nervousness as evidence of this. Our interviews did not find widespread accounts of learners disregarding EPA as either unnecessary or of little value.

# The relationship between EPA and mandatory qualifications

We found that for several of the apprenticeship standards that we analysed, employers valued mandatory qualifications more than the apprenticeship as a whole and more than EPA. In these instances, the primary driver of employer and learner interest in the apprenticeship was the qualification. If it was not integrated with EPA, it became the priority for both learner and employer. While all providers and employers that we spoke with were aware of this dynamic in some apprenticeship standards, not all providers had a clear understanding of, for example, the proportion of learners completing a mandatory qualification who then did not pass gateway.

The variety of perspectives on this topic are illustrated by the feedback we received where mandatory qualifications:

- were felt to be more academic and difficult than the requirements of the standard, for example for the associate project manager standard
- were felt to have been dealt with through the new IfATE policy requiring the integration of one unit/component into EPA, for example in the HR consultant partner standard

- were seen as delivering occupational competence and having greater standing than the EPA/apprenticeship, for example for the adult care worker and HR consultant partner standards
- were relatively small add-ons in the standard, for example for level 3 carpentry and joinery
- were seen to deliver occupational competence for some purposes but only skills for others, for example for an engineering operative
- were seen as very important, but EPA was also highly valued mainly because
  of delivery independence and culture within the employers, this was the case for
  the NHS senior healthcare support worker

Some employers also expressed concern about the continuous formative assessment required to prepare for EPA, for example the development of a portfolio. It was felt that this often overlapped with or largely duplicated the continuous assessment requirements for mandatory qualifications. This creates parallel processes and also a double event towards the end of an apprenticeship, which is a feature of apprenticeships where mandatory qualifications and EPA are not integrated.

There were instances where learners and employers recognised the added value of EPA over and above a mandatory qualification, but this was far from universal.

# The relationship between EPA and non-mandatory qualifications

During our interviews, apprenticeships that did not contain mandatory qualifications but instead incorporated certificates as part of the learning journey were discussed. These non-mandatory qualifications, found in management as well as the improvement standards, did not appear to significantly detract from learners' commitment to EPA, even though they potentially had greater standing than EPA. However, we were told that providers and employers had tried to align the timing of these certifications with EPA to minimise any potential disincentive for apprenticeship completion.

# Design and use of apprenticeship standards

Employers and providers indicated that many employers used certain apprenticeships for career development and skills add-ons rather than for initial training or training before, or at the point of, promotion. This was common in many apprenticeships with a high percentage of leavers close to EPA. Existing staff were either 'put onto' or they applied for the apprenticeship, and there would usually be few or no negative consequences of dropping out. An example of this is in the management apprenticeships, where many apprentices were already managers and were therefore seen as partially or even largely occupationally competent when they started the apprenticeship.

# Other barriers to EPA entry and completion

Employers reported being generally satisfied with the service offered by EPAOs, although this was not a universal view. Criticisms of EPAOs tended to be concentrated in standards where a monopoly or near-monopoly EPAO operated, where employers may have felt pushed into using a professional body for EPA. Criticisms included EPAOs being over bureaucratic, expensive and inflexible on retakes; that apprentice projects were not directly relevant to their role in the

company; or that there were EPA assessors who were only able to relate to their own career background. Several employers reported having changed EPAO to deal with problems.

Employers said that functional skills requirements were the single biggest barrier to both the completion of apprenticeships and entry to apprenticeships. They felt the requirement was unnecessary and expressed some resentment towards the policy and for having to do something they felt "should be done in school".

Employers were generally happy to include maths and English content when it was required for the occupation. However we heard many accounts from providers and employers of functional skills requirements leading to apprentices dropping out or potential learners not starting, despite employers stating that these individuals would have been perfectly capable of completing the apprenticeship. One employer said that more than a third of the staff they wanted to train through apprenticeships could not or would not start because of the functional skills requirements. A number of employers also said they were aware that the functional skills requirements for apprenticeships were much more demanding than for full-time education.

# CONCLUSIONS AND RECOMMENDATIONS

Having analysed the evidence gathered from the interviews with employers and providers, we formulated a series of conclusions and recommendations to help prevent or minimise future issues.

Our conclusions and recommendations are set out in the same order as the key themes that emerged from the evidence gathered, as described in Evidence: Provider and employer interviews and in the detailed feedback in Annex 1: Review of the standards per route.

#### SUPPORT FOR LEARNERS TO COMPLETE THEIR APPRENTICESHIP

Nearly all employers said there was good manager commitment to learners completing their apprenticeships, but it did vary and sometimes had to be dealt with by apprenticeship coordinators, senior management and/or HR. Most of the employers we interviewed also described providing good support for apprentices leading up to and through EPA.

Because these are operational matters about the quality of training, they should be addressed by quality development and the Office for Standards in Education, Children's Services and Skills (Ofsted) inspection regime.

#### EMPLOYER AND LEARNER ATTITUDES TO EPA

We found that EPA is almost always supported and valued by both employers and apprentices, except where there is a substantial mandatory qualification which accredits skills or occupational competence (see below). The fact that EPAOs and assessors are independent was particularly valued by employers.

The existence of the high-stakes EPA at the end of apprenticeships is bound to be responsible for some learners dropping out, but it seems to account for a limited number of leavers when compared to some of the other issues, especially the functional skills policy.

However, EPA would benefit from having a long-term vision. It is unfortunate that EPA relies heavily on continuous assessment and portfolio building, which is linked to the apprenticeship training process. This means that EPA cannot easily be taken by people who are not taking the apprenticeship and that it is harder to fully integrate EPA with qualifications. So, for example T Level students in some occupations or adults learning informally cannot access EPA easily, even if they were willing to pay for it.

# Recommendation I

DfE should develop a long-term vision for EPA that includes its use outside of apprenticeships. This will involve reconsidering formative/continuous assessment and the portfolio building requirements of EPA.

# THE RELATIONSHIP BETWEEN EPA AND MANDATORY QUALIFICATIONS

It is clear that mandatory qualifications often take precedence over EPA and are often a key cause of weak employer and learner interest in and commitment to EPA. We have found that mandatory qualifications always detract, to some extent, from the employers' and providers' views of EPA. Most of the employers we interviewed had worked hard to overcome the effect of this on the motivation to complete EPA, usually with some success. However as already noted, the status of the mandatory qualification varied considerably depending on the standard.

The revised IfATE policy, which now requires the integration of at least one element of assessment between a mandatory qualification and EPA (as seen in the level 5 people professional standard which replaced the HR consultant partner in late 2023), will deal with the basic problem of learners dropping out before EPA but after achieving the mandatory qualification. However there is a risk that the issues around the duplication of formative/continuous assessment and/or portfolio building for EPA and mandatory qualifications will remain problematic. This wastes time and resources, while generating employer resentment and even, as one interviewee reported, causing issues at Ofsted inspection. Therefore in addition to the IfATE policy change, we make two recommendations.

#### Recommendation 2

The relationship between the formative/continuous assessment required for mandatory qualifications and for EPA should be decided nationally, not by each provider applying recognition of prior learning techniques and/or devising merged assessment approaches. It is part of how the apprenticeship works and fits together, so if employers in a trailblazer group want the mandatory qualification, they should identify the knowledge, skills and behaviours (KSBs) it delivers to minimise duplication.

## Recommendation 3

There are several types of mandatory qualification, our recommendations for each are as follows:

- For qualifications which deliver full occupational competence and are assessed by EPA, full integration of the EPA and the qualification is the best approach (if possible) to avoid formative/continuous assessment/portfolio building being duplicated, once for the qualification and once for the EPA. If integration is not possible, formative/continuous assessment should be used for the qualification and/or portfolio building for the EPA, with one component of the qualification held back for EPA as stated in the new IfATE policy.
- For qualifications which deliver the off-the-job training or knowledge component and perhaps some skills, the KSBs the qualification delivers must be identified and should be assessed for the qualification. Any formative/continuous assessment and/or portfolio building outside of this should relate to the remaining KSBs only.
- Small awards for specific parts of the standard (such as food hygiene certification) should be dealt with in the same way as qualifications which deliver full occupational competence.

 Qualifications which deliver a substantial proportion of both the required knowledge and skills but do not fully deliver occupational competence (e.g. engineering operative) are most difficult to deal with. Skills are not the same as competences but the terms are sometimes used interchangeably. So full integration of the qualification with EPA would be the best approach but may be difficult because of the difference between a skill and a competence statement. If full integration cannot be achieved, then the KSBs the qualification does not deliver must be identified and should be the subject of separate formative/ continuous assessment.

# THE RELATIONSHIP BETWEEN EPA AND NON-MANDATORY OUALIFICATIONS

We were originally concerned that there could be examples of professional body status taking priority over the achievement of EPA. However, this does not appear to be a significant cause of dropout, except in relation to mandatory qualifications discussed above. Some employers did not like feeling pushed into using a professional body for EPA, but IfATE is aware of this problem and has acted accordingly.

However it would be counterproductive to seek to stop employers and training providers from incorporating other certificates into their training (e.g. the green and black belts for business improvement). The effect of these certificates on dropout rates can be mitigated by ensuring that the timing of assessment and certification is aligned with EPA.

## Recommendation 4

Guidance should be issued to training providers and employers to ensure that assessment and certification for non-mandatory qualifications is timed to coincide with EPA.

# DESIGN AND USE OF APPRENTICESHIP STANDARDS

The design and use of some apprenticeships for workforce development and upskilling rather than occupational training impacts completion rates. This significantly reduces the motivation of learners to finish their apprenticeships. Employers largely used the associate project manager and improvement practitioner apprenticeships for existing staff. Key features of these standards are:

- a. They do not define the whole occupation. In theory they can, but in practice they more usually represent only a part of the job role.
- b. They involve existing staff who are usually already largely occupationally competent.
- c. Completion is not a requirement for staff to become occupationally competent.
- d. Entry and achievement tend to be voluntary and often must be applied for internally.
- e. The training may be more important than completing the whole apprenticeship, although this can also be true for many other apprenticeships.
- f. However, these training programmes are substantial and are based on occupational standards.

Employers and training providers have worked hard on retention and achievement rates. This has included the careful selection of apprentices, communicating about EPA early and throughout the programme, incentivising achievement internally and within HR structures, and supporting learners up to and through EPA. Other occupational standards contain some of the features listed above, for example management standards usually include features a, b and e.

Vacancies associated with these standards are rare and promotions into new roles for the apprentices only happen occasionally. These apprenticeships are therefore much lower cost than apprenticeships that involve recruiting and training from scratch, especially where young people are involved.

## Recommendation 5

If ATE should review this position and consider:

- Whether standards covered by points a to d above, should be categorised in a different way to full apprenticeships. This could link to any change to extend the ability of employers to invest levy funds beyond apprenticeships.
- What the prior learning position really is and how effectively providers are assessing prior learning to ensure that those who are already largely occupationally competent do not start an apprenticeship.
- Whether apprenticeship funding should or could be varied depending on whether the apprentice is filling a vacancy or if the apprenticeship is being used to develop the skills of existing workers, such as for promotion.

## OTHER BARRIERS TO EPA ENTRY AND COMPLETION

Employers feel that the functional skills policy, which requires the achievement of a given level of functional skills, has been the biggest reason for learners dropping out and has also led to fewer people starting apprenticeships. The only exceptions to this are standards that routinely only recruit people who have already achieved the necessary GCSE grades. The functional skills requirements were almost universally resented and even derided by employers (more so than by providers) and, reportedly, by apprentices too. They did not understand why they were required to train apprentices in maths and English that was not related to the occupational standard. Employers were happy for the maths and English related to specific KSBs to be included and there was no fundamental objection to the continued learning of maths and English for personal development purposes, especially for young people.

It seems odd that this requirement remains when it has been dropped for T Levels and does not apply to any other post-16 learning programme.

# Recommendation 6

Apprenticeship standards should specify the maths and English requirements linked to the KSBs, similar to the way they are mapped in T Levels. All apprentices should have to meet those requirements. The functional skills policy for young people should be aligned with T Level policy, meaning that continued development wider than the standard carries on, but that no specific level needs to be achieved, as is already the case for T Levels and full-time FE. Adults should only have to achieve the maths and English required by the standard.

We found one example where an employer was using a standard as a recruitment tool (it was a level 2, so the employment status was quite low). The apprentices were then filtered into different employment routes. This could be seen as exploitation because they were using the levy and the apprentice minimum wage to fill vacant positions, and this type of practice is likely to disincentivise apprenticeship completion unless steps are taken to address it.

#### Recommendation 7

DfE should monitor for the use of this practice using the key performance indicators proposed in recommendation 8 and the practice should be discouraged.

#### DATA AND INSIGHT

Insufficient data is published on the number of apprentices who leave after they have completed most of their training and about mandatory qualification achievement by apprentices. While those we spoke with were clearly aware of issues with the late withdrawal of apprentices in specific standards, and many had a good understanding of the size of the problem affecting their provision, no information is routinely published showing the scale of this issue by standard. On a related point, publishing data on the achievement of mandatory qualifications would help plans by employers, providers, DfE and IfATE to support improved apprenticeship achievement rates.

#### Recommendation 8

Non-completers who withdraw after most or all of the training are relatively easy to convert into completers. We therefore urge DfE, Ofqual and IfATE to publish this data routinely so that the proportion of apprentices dropping out after completing the majority of their programme can be monitored as a key performance indicator.

# Recommendation 9

The new IfATE policy requiring the integration of at least one component of assessment between any mandatory qualification and EPA, will deal with the basic problem of dropout before EPA and after achieving the mandatory qualification. However, there is no published data on the attainment of mandatory qualifications and, based on the interviews carried out for this project, it remains unclear whether providers monitor this aspect. Therefore, we recommend that DfE and IfATE collect and publish data on the achievement of mandatory qualifications.

# DRAFT HYPOTHESES NOT SUPPORTED BY EVIDENCE

There were draft hypotheses developed before the interviews with employers and providers that were not supported by the evidence the project team subsequently gathered:

• We found no evidence suggesting that employers viewed standards as low level and lacking in status. Initially we believed that the engineering operative and lean manufacturing operative standards might fit into this category, because they were both level 2 and seemingly contained little that would provide a completer with status. However, the employers we interviewed appeared very positive about their impact and there were no obvious negative effects on apprentices motivation to complete the standards.

- We found no examples where the job role was narrower than the occupational standard, which could be demotivating for apprentices. This relates to the rule that EPA is required to cover all the KSBs. This issue was not raised during discussions and we understand that IfATE is adjusting its guidance to trailblazers to relax this rule, allowing EPA to test some KSBs, rather than having to test them all. It may be possible, for example, to allow some KSBs to be learnt in off-the-job settings and assessed differently during EPA. What the EPA assessment covers is effectively already relaxed for standards with core components and options.
- It seems that assessment burden is not a major factor, outside of the duplication between mandatory qualifications and formative/continuous assessment/ portfolio building for EPA. Although we were told about a small number of other employer complaints about EPA, as noted above.
- EPA operational matters and procedures did not appear to have a significant impact on completion rates. Nearly all the employers and providers interviewed said that there were now few problems with the operational work of EPAOs. However, many could cite earlier issues they had had with certain EPAOs. Many employers and providers had changed EPAO to deal with problems. They really valued having a choice of EPAO and IfATE and Ofqual already aim for this to be introduced.
- We could not gauge whether the 'use it or lose it' nature of the apprenticeship levy drives employers to maximise its use through workforce development-type apprenticeships. Interview feedback suggested that larger employers were not generally incentivised to quickly draw down all of their levy. Instead it seems they are adopting a more cautious approach, gradually increasing their levy spend by using a wider range of apprenticeships and, in some cases, increasing the number of apprentices. There is nothing wrong with this and it appears to be gradually increasing the number of apprenticeship starts.

# ANNEX I. REVIEW OF STANDARDS PER ROUTE

Annex I details the findings for each standard. The standards looked at in the first tranche are listed by route together with the headline data for each standard. The findings for each standard are then listed/categorised into I4 enquiry themes. For the spreadsheet, see Review of the standards per route.

# ANNEX 2. FOI AND SUBSEQUENT ANALYSIS

Annex 2 combines data received through an FOI request submitted to DfE, and the analysis carried out by the project team to refine the shortlisted apprenticeship standards for investigation. For the spreadsheet, see FOI and subsequent analysis.

The implications of this data are:

- a. Non-completing leavers who left past their planned end date or within three months of reaching that date are shown in columns F and G (numbers) and J and K (as a percentage). Where these figures are high, it indicates that completion of the apprenticeship, including gateway and EPA, could be a problem. Apprentices would have completed most or all of their on- and off-the-job training but would then have left before being approved for the gateway to EPA. In theory, employers would be aware of this because they signoff on the apprentices readiness for EPA. It is difficult to distinguish between the two groups until we speak to providers and employers, but logically, leaving past the planned end date may suggest slower than expected learning and therefore less effective workplace and/or off-the-job training. Also, it could sometimes indicate difficulties in accessing EPA.
- b. The sum of these two non-completer groups is shown in column I, which is an absolute number that also includes all other early leavers, and column M, which is the non-completers who were close to EPA and is given as a percentage of all non-completing leavers, usually described as all early leavers.
- c. Please note that the percentages shown for these two groups in columns J, K and M are the percentages of non-completing leavers not the percentages of all leavers.
- d. If the figure in column M is high (we have defined high as 30%+ with a few exceptions) this is the first indication that there could be a gateway/EPA problem.
- e. If the figure in column M is high and the completion rate percentage in column Q is relatively low (and/or the early leaver percentage in column L is high) it indicates the significance of the problem for the performance of the standard, for example it is very significant and performance is poor overall.
- f. If column M is high but the completion rate in column Q is high or moderate, then there could still be a significant gateway/EPA issue and dealing with it can improve performance, potentially resulting in a very high performing standard. In these cases, the early leaver rate overall is lower so the standard is performing reasonably well, but it could perform significantly better.

- g. We have separated early leavers using our own definition of early leavers not included in either of the groups close to EPA (covered in a to c above and represented in columns J, K and M) and expressed as a percentage of all leavers (both completers and non-completers). This is column L, and it gives an indication of the percentage of early leavers who were not close to EPA and whose reasons for leaving were generally linked to other factors such as labour turnover, wrong choices and/or poor quality of training.
- h. Column R is the percentage of completers who passed gateway but who did not complete EPA. Where the percentage is above 1% or 2% it is likely there is an operational problem with EPA itself or with the procedures or availability of assessment.
- i. Column T is the percentage of apprentices who were employed for less than three months before starting the apprenticeship, meaning they were either recruited into an apprenticeship or put on it soon after. The remaining percentage indicates the standard being used to develop the existing workforce however, this must be interpreted with contextual knowledge of the route. For example, the NHS tends to use some apprenticeships to upgrade existing workers, particularly before, or at the point of, promotion, therefore it is not uncommon to see a high percentage for some standards. A different employer may put staff on an apprenticeship who are already doing the job and who are largely occupationally competent. In these cases the apprenticeship provides workforce development and/or a qualification and/or a certain amount of upskilling.
- j. Column U is the percentage of apprentices who work for levy paying employers. This seems to be a very significant factor for those standards where a workforce development approach seems to have been taken.
- k. Columns V to AA are from the IfATE data. V gives the typical duration of the apprenticeship in months. W gives the date it was approved and indicates whether there could be any distortion of the numbers because a standard has recently been introduced. Column AA gives the standards that are recorded as regulated by a professional body.
- I. Column S says whether a mandatory qualification is involved. This information is not explicitly included on the IfATE spreadsheet, except for degree apprenticeships and some other high-level standards. Therefore we have tried to locate this information from the API or by manually reviewing the standards.

# ANNEX 3. INTERVIEW LINES OF ENQUIRY

The questions in this annex are the basis of both the employer and provider interviews carried out for this project. The majority of themes (numbered) and questions (lettered) are the same for employers and providers alike, however there are some contextual differences that are identified in the provider column where there is text instead of an X. An X in both columns means employers and providers were asked the same question.

LIN	es of enquiry themes and questions	EMPLOYER	EMPLOYER PROVIDER			
1.	Views on EPA					
a.	Why have apprentices dropped out after completing most/all of their training?	×	×			
b.	Are there any consequences?	×	X			
2.	Views on employer attitudes to EPA related to this standard					
a.	Do/how do you get involved in the gateway and EPA: how it works, who does what?	×	a. Do employers understand gateway and EPA: how it works, who does what?			
b.	What do you think about the value of EPA? Do you take an interest in differences between the likes of pass, merit, distinction?	×	b. Do employers value EPA, do they take an interest in differences between the likes of pass, merit, distinction?			
C.	Do you use apprenticeship achievements in recruitment, promotion, career development, pay awards and do the staff have to have completed the whole apprenticeship?	×	c. Do they use EPA achievements in recruitment, promotion, career development, pay awards?			
d.	Do you provide support to apprentices for EPA preparation?	X	d. Do they provide support for EPA preparation themselves?			
e.	Do you trust that apprentices are fully competent when training is complete?	×	e. Do they think apprentices are competent when training is complete?			
f.	How do you deal with gateway sign-off?	×	×			
g.	Have employers ever commented on EPA?	×	×			
h.	What are the functional skills needs of most apprentices on this standard?	×	×			
i.	What proportion of apprentices would you estimate functional skills poses a barrier for completion?	×	×			
j.	Do study skills pose any issues for completion? For instance, apprentices who have not studied before or studied a long time ago.	×	×			
k.	Are there any other requirements of the gateway which are barriers to moving on to EPA?	×	×			

3.	Views on apprentice attitudes to EPA related to this standard					
a.	Do apprentices take EPA seriously?	×	X			
b.	Do they prepare carefully?	×	X			
c.	Do they work hard on any EPA portfolio or other assessment?	×	X			
4.	Any evidence of apprentices baulking/resisting EPA					
a.	Too much to prepare for	×	×			
b.	Acute nervousness	×	X			
C.	Not worth it and what makes them think this – do they see its value for their career as well as their immediate job?	×	×			
d.	No penalty for not doing EPA	×	X			
5.	Role of EPAO					
a.	How does your EPAO work with you, line managers etc. through the process of EPA?	×	a.	How different EPAOs act to engage employers, line managers etc. With the value and process of EPA?		
b.	How/has EPAO been involved in the apprentice's learner journey to build understanding of EPA and EPA value?	×	×			
C.	Does successful EPA also provide any form of membership/ accreditation and does this add value to EPA?	×	×			
6.	Role of provider					
a.	Are your provider teaching and assisting staff clear on EPA value and requirements?	×	a.	Are teaching staff cle requirements?	ear on EPA value and	
b.	How readily can the provider find/recruit teaching staff with relevant subject matter expertise and experience in supporting apprentices with EPA preparation?	×	b.	How readily can you find/recruit teaching staff with relevant subject matter expertise and experience in supporting apprentices with EPA preparation?		
C.	How much support does your provider offer to your staff?	X	c.	How much support does EPAO offer to provider staff?		
7.	EPA mechanics/costs/access					
a.	Did you or your provider choose your EPAO?	×	a.	No provider profit in EPA price vs 20%		
b.	Is the EPAO hard to access or set up?	×	X			
C.	Any procedural problems/delays?	×	X			
THEMES/TYPES OF STANDARDS FOR EXPLORATION AS APPROPRIATE						
8. Explore workforce development vs initial training						
a.	Standard not an occupation but often an add-on to an occupation e.g. project manager				×	

b.	Staff already in occupation and largely competent	×	×				
c.	If do not do EPA then still stay in job	×	×				
d.	Monetisation of learning and development function	×	×				
e.	Levy incentives	×	×				
9.	Explore whether the occupation has little wider currency						
a.	Job not an occupation	×	×				
b.	Confined to one employer/employment e.g. dual fuel meter installer	×	×				
C.	Operative standard or other low-level occupation with limited wider currency	×	×				
10.	Explore whether employer really needs the training or whether it is e.g. for lon	ger-term career developme	ent				
a.	Learner motivated apprenticeship not employer e.g. level 3 carpentry and joinery	×	×				
b.	Not much real employment but more usually voluntary work e.g. animal welfare	×	×				
C.	NHS/civil service/large employer culture i.e. career development, 'put onto' courses etc.	×	×				
11.	Explore employer vs manager attitudes						
a.	Employer keen on workforce development but line managers less so	×	×				
b.	Managers issuing rewards or disincentives	×	×				
12.	Explore any possible employer exploitation of apprenticeship minimum wage						
a.	Repeat recruitment to replace apprentices (reported in care sector)	×	×				
b.	No fully economic need but can pay apprenticeship minimum wage (overlaps with above e.g. animal welfare)	×	×				
13.	13. Management development						
a.	Pre-promotion	×	×				
b.	Already in role and considered largely occupationally competent and being trained (e.g. go on courses, get a degree etc.)	×	×				
14.	4. Explore both mandatory qualifications and those which are not mandatory but are part of the programme						
a.	Taken/achieved before EPA gateway	×	×				
b.	Qualification is the licence to practice not the apprenticeship/EPA	×	×				
С.	Qualification duplicates EPA i.e. accredits occupational competence	×	×				
15.	15. Any other issues related to EPA						