END-POINT ASSESSMENT REFORM

A REPORT TO THE GATSBY FOUNDATION

ALEX MORRIS (AVENCERA)

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INTRODUCTION

BACKGROUND

Apprenticeships in England have undergone significant changes over the last decade, moving from a system of qualification-based frameworks to one centred around occupational standards designed by groups of employers. Fundamental to this system is the requirement that all apprentices undertake an independent and holistic assessment of their occupational competence at the end of their apprenticeship, known as end-point assessment (EPA).

In February 2025, the Department for Education (DfE) announced that EPA would be reformed in a number of ways, including allowing greater flexibility in how and by whom assessment could be delivered, and when during the apprenticeship it could take place.[1]

These reforms represent a potentially major change to apprenticeship assessment, with significant implications for assessment organisations, training providers, employers and apprentices.

This report explores: the extent to which the current EPA system is delivering an effective and efficient system for assessing occupational competence; the problems which the 2025 reforms seek to address; and the opportunities and risks presented by the proposed reforms. We make a series of recommendations for how government should proceed in order to realise those opportunities and mitigate the risks.

PURPOSE OF THIS RESEARCH

This report seeks to answer a number of questions:

- What is currently working well about EPA and should be retained in any future system?
- What is not working well about EPA and should be reformed?
- What problems do the reforms announced in February 2025 seek to address?
- What do different actors in the EPA system perceive to be the main opportunities of the proposed reforms and how can these be realised?
- What do different actors in the EPA system perceive to be the main risks of the proposed reforms and how can these be mitigated?

To do this we have conducted extensive desk research and a series of in-depth interviews with assessment organisations, training providers, government agencies and sector bodies. The research underpinning this report was undertaken in August and September 2025, ahead of publication of the first new assessment plans. It reflects views at that time but our conclusions and recommendations remain the same. An annex to this report considers these recommendations in the context of the first three assessment plans.

1 More red tape slashed to reduce apprenticeship bureaucracy - GOV.UK; Apprenticeship Assessment Principles – Apprenticeship Service Support

We believe that this is timely for a number of reasons:

- Whilst the reforms to EPA were announced in February 2025, it is clear that the DfE (and now the Department for Work and Pensions (DWP)), Skills England and Ofqual are still considering how they can be optimally delivered and we make recommendations which can help inform this thinking.
- To that end, Skills England is currently working with Trailblazer groups to design new assessment plans. Three of these have now been published which will act as pilots of the new approach; we consider these in an annex to this report. Ofqual has recently consulted on its proposed approach to regulating the reformed system. The outcomes of this consultation also inform the annex to this report, although specific details around regulatory conditions and guidance are still subject to further consultation.
- In September 2025 it was announced that responsibility for apprenticeships would transfer from the DfE to the DWP. This presents an important moment for government to reflect on its priorities for apprenticeships.

SUMMARY OF CONCLUSIONS

The current reforms represent a significant shift in apprenticeship assessment delivery – by allowing assessment to take place on programme; by allowing training providers and employers to deliver aspects of it; and by providing much less detail and standardisation through assessment plans.

EPA has been part of the English apprenticeship system for around a decade. Fundamentally it is a system that works, that provides robust assessment of occupational competence and that, crucially, employers recognise and value. Undoubtedly there are aspects of it that could be amended; individual assessment plans with overegged requirements that could be streamlined; provider and employer behaviours that could shift to help each other operate more smoothly. But the current reforms seem a heavy-handed overcorrection in this context. They risk undermining some core tenets of EPA and, even if the resultant assessment system works, will absorb significant capacity and resource from government, training providers, employers and assessment organisations to transition. We believe a similar end result could have been delivered less disruptively and less riskily by making some small tweaks to overall policy and by amending individual EPAs on a case-by-case basis by revising those which present most challenge to delivering effective and efficient assessment.

But assuming that government does intend to proceed with the reforms, four things are fundamental to ensuring that they deliver benefit with as little regression in standards and disruption to delivery as possible:

- Holding firm to the core principles of independence, consistency and synopticity. These principles have underpinned EPA design to date and are fundamental to employer and apprentice confidence in the system. The reforms present several ways in which these principles could be undermined, but careful planning and oversight of delivery should allow that to be avoided.
- Getting realistic about timescales and sequencing. Skills England is a new organisation, and although it has inherited much of the staff and expertise of the Institute for Apprenticeships and Technical Education (IfATE), it is still finding its feet and is now coping with the practicalities and implications of the machinery

of government changes which have moved it to the DWP. It has been working with Trailblazer groups for a number of months to develop five assessment plans in line with the new approach, with the outputs from this work delayed a number of times. Three of these have now been published but the timescales suggest the work and negotiation between parties is more complex than originally imagined. The idea that all 700+ assessment plans will be revised by August 2026 seems at this juncture as unrealistic as the original (and unfulfilled) commitment to review and revise all apprenticeship standards every three years. Government needs to set a realistic timeframe for this work based on early experiences of the first five standards, then prioritise standards for revision and clearly communicate the timescales and sequencing to allow the sector to plan. This is particularly important given that EPA reform is not the only reform which providers are grappling with – they are also working out the implications of changes to English and maths requirements and duration, removal of level 7 funding, and the rapid rollout of the new Ofsted inspection framework.

- Communicating. It has been striking in our conversations across the sector how varied the access to information about the reforms is. Some people sit on formal DfE groups or the Trailblazers for the five test standards, some leverage contacts in government to access information, most access sessions run by representative bodies, some are left in the dark. To allow the sector time to plan and prepare properly, the government and its agencies need to communicate more often and more broadly than at present.
- Undertaking proper evaluation of the impact of the reforms and collecting the necessary data to do so. The introduction of EPA to apprenticeships was a significant change from the previous assessment regime. It is striking that no serious evaluation of the impact of this change appears to have been undertaken or to have informed current policymaking. But the introduction of new approaches phased across standards allows a golden opportunity for the government agencies involved to agree an approach to the evaluation and to put in place processes to capture the necessary data.

POLICY BACKGROUND AND CONTEXT

WHAT IS END-POINT ASSESSMENT?

End-point assessment (EPA) is the assessment all apprentices take at the end of their apprenticeship to validate their competence in the occupation they have been trained in. The exact requirements and design of EPA vary for each apprenticeship standard and are specified by the employer group which designs that apprenticeship to ensure that they suit the needs of the specific sector. However, all EPAs share common features in line with policy requirements set by government:

- EPA is an independent assessment: it must be conducted by an independent organisation not by the apprentice's employer or training provider.
- EPA is a holistic, synoptic assessment taken once the apprentice has completed their apprenticeship and been signed off by their employer as competent through a process known as 'gateway'.
- EPA contains more than one assessment method, which could include practical assessments, interviews or written tests. An EPA plan, designed by a group of employers in the relevant sector and approved by Skills England, exists for

each apprenticeship and describes the methods that must be used and other parameters around them.

- In some cases, apprenticeships can contain mandatory qualifications which the apprentice must achieve as well as completing their EPA (for example, where this is a regulatory requirement or required for professional body registration). In these cases, where possible, government policy has been that the EPA and assessment of the mandatory qualification should be integrated,[2] an approach that has caused operational complexity in some standards.

WHY WAS END-POINT ASSESSMENT INTRODUCED?

EPA was introduced as part of wide-ranging reforms to improve the quality and employer-responsiveness of apprenticeships in England in the middle years of the 2010s. It was designed to ensure every apprentice undertakes a substantive, independent assessment at the end of their apprenticeship to confirm they are occupationally competent.

Prior to this, the apprenticeship system was based on frameworks – primarily qualification-based pathways with apprentices achieving a range of competency-based and technical qualifications, such as BTECs and NVQs, during their apprenticeship. These qualifications were underpinned by National Occupational Standards. Assessment was incremental, delivered during the training programme and by the training provider (although set and overseen by awarding organisations).

In 2012 the government commissioned Doug Richard to review the apprenticeship system in order to 'ensure that in the future the programme is meeting the needs of the changing economy, consistently delivers the professionally recognised qualifications and skills which employers and learners need, and is maximising the impact of government investment.'[3]

Richard and others identified a range of problems with the framework system, including its complexity, the lack of employer involvement in the design of apprenticeships, and that incremental, continuous assessment detracted from training time and did not necessarily assess overall competence.[4] Fundamentally, it reported that employers found that apprentices who had completed framework apprenticeships might not be fully occupationally competent, because, whilst they had demonstrated the acquisition of individual skills, they had not been holistically tested in a way that required them to put together the different elements they had learnt.[5]

In response, the Richard Review recommended a number of significant changes to the English apprenticeship system including:

- Apprenticeships should be redefined to clearly target staff new to a role requiring significant training in order to become fully competent in it – not to provide entry routes into employment or to train staff who were experienced in role and already substantively competent.
- Outcome-based standards should form the backbone of apprenticeships, replacing frameworks and providing a clear statement of what an apprentice should know and be able to do at the end of their apprenticeship.

2 NEW Mandatory Qualifications Criteria

3 Richard Review Terms of Reference: richard-review-full.pdf

4 Richard Review and BIS-15-604-english-apprenticeships-our-2020-vision.pdf

5 BIS-15-604-english-apprenticeships-our-2020-vision.pdf

- Apprenticeships should be designed by groups representing the interests of employers.

Specifically related to assessment, Richard recommended that testing and validation should be undertaken via an independent holistic assessment taken at the end of the apprenticeship and should assess whether the individual is fully competent in their job and employable within their sector. The Review also recommended that a range of methods should be used in this assessment; that in many cases this was likely to involve observation of the apprentice and their work; and that grading beyond pass/fail should be used to recognise achievement.

The government accepted Richard's recommendations, and from 2013 the first employer groups ('Trailblazers') began work designing standards and assessment plans. In November 2015 the government announced that it would establish an employer-led regulator to oversee the quality of apprenticeship delivery, including in assessment.[6] The Institute for Apprenticeships was established through the Technical and Further Education Act 2017 and came into being on 1 April 2017. The Institute (later expanded in remit and title to the Institute for Apprenticeships and Technical Education (IfATE)) oversaw the development of standards and assessment plans by Trailblazer groups. From 1 April 2025 IfATE was abolished and its functions transferred to Skills England, a new executive agency of the DfE.

KEY FEATURES OF THE CURRENT EPA SYSTEM

The EPA system today covers the assessment of over 700 apprenticeship standards by over 300 end-point assessment organisations (EPAOs),[7] 154 of which are Ofqual recognised. This system has evolved over the last decade, but its fundamental features, outlined below, remain.

The occupational standard and end-point assessment plan remain the foundational documents for each apprenticeship, setting out, respectively, the duties, knowledge, skills and behaviours (KSBs) an apprentice will need to be able to demonstrate by the end of their apprenticeship in order to be deemed occupationally competent, and how these will be assessed. Both documents are created by Trailblazer groups, made up of employers in the occupation, supported by officials from Skills England.

Assessment plans set out a range of details about the assessment including the methods to be used, which knowledge, skills and behaviours each method will assess, any parameters around the methods (for example, length, number of questions, whether an exam is to be open- or closed-book), and grade descriptors.

The assessment is designed and delivered by an independent EPAO, following the requirements set out in the EPA plan. This system places a much greater onus for assessment delivery on assessment organisations than is the case in other vocational qualifications (including those which made up apprenticeship frameworks) where assessment is often administered by training providers and quality assured and moderated by an awarding organisation.

Government quality assurance and regulation of EPA has evolved over the era of apprenticeship standards. Originally organisations wishing to deliver EPA were required to register, separately for each standard, on the Skills Funding Agency's

6 BIS-15-604-english-apprenticeships-our-2020-vision.pdf

7 EPAO figure provided by DfE officials. A complete register of EPAOs across standards regulated by Ofqual, the OfS and other bodies is not publicly available.

Register of Apprenticeship Assessment Organisations (subsequently renamed Register of End-Point Assessment Organisations). Once registered, external quality assurance (EQA) was provided by either an employer group, a professional body, Ofqual or IfATE – the choice being made for each standard by the Trailblazer group, depending on which model they deemed most appropriate in their sector.

EPAOs did not have to be Ofqual-regulated awarding organisations originally and, whilst many were, a number of other organisations became EPAOs, including new assessment organisations, established to take advantage of the new market opportunity presented by EPA, and established professional bodies that were not regulated by Ofqual. Following a consultation in 2020 to strengthen and simplify the assessment system, the system of EQA was removed and all EPAOs were required to be regulated by either Ofqual or, in the case of integrated degree apprenticeships, the Office for Students (OfS).[8] A small number of exceptions were permitted, for example in sectors where entry to a profession must be approved by another regulator.

The costs of EPA are funded from the Apprenticeship Levy (for levy-paying employers) or through a process of co-investment for non-levy employers and will typically be negotiated by the training provider (on behalf of the employer) and EPAO. These costs are driven by a range of factors, including the assessment methods used and the sector. Nominally the charge for EPA can be up to 20% of the overall funding band for each apprenticeship. However, in reality costs are somewhat lower than this. An early report for IfATE suggested the average reported cost of EPA on a small sample of standards was 13%.[9] More recently Ofqual's *Qualification price statistics report: 2025* suggests that the average cost of EPA (on standards regulated by Ofqual) is 11.4% of the funding band, although it is worth noting that this makes the average price of EPA £1,004 compared to £72 for other vocational qualifications.[10]

CURRENT REFORMS

In February 2025 the DfE announced a series of significant reforms to apprenticeship assessment in order to make the system simpler and more flexible.

These reforms sit alongside a wide range of other reforms to apprenticeships that have been announced since the new government took power in July 2024. These have included removing public funding from level 7 apprenticeships; reform of the apprenticeship levy into a broader Skills and Growth Levy; establishment of Skills England; and reducing the minimum duration of apprenticeships from 12 months to 8 months where appropriate.

The reforms in assessment maintain a number of the current features of EPA, including that Trailblazer groups, working with Skills England, will still design assessment plans; Assessment Organisations will continue to be responsible for developing all assessment materials; and regulation will continue to be provided by Ofqual, the OfS or another regulatory body in the small number of cases this approach has been permitted.

8 IfA_publication_template

9 Cost of delivering apprenticeship standards

10 Qualification price statistics report: 2025 - GOV.UK

The key features of apprenticeship assessment that will change as part of these reforms are that:

- Assessment plans can now be designed to allow assessment to take place on programme.
- Training providers may deliver and mark elements of the assessment.
- Verification that behaviours have been demonstrated will be provided by employers.
- Assessment plans will be significantly shorter than at present and specify only the minimum number of assessment methods for validity.
- Where assessment takes place through a mandatory qualification during the apprenticeship, this will not be retested through the apprenticeship assessment.

Since this was published Skills England has produced a template for the new, shorter assessment plans.[11] Skills England has worked with Trailblazer groups to develop new assessment plans in this template for five apprenticeships as a test of the proposal. The five apprenticeships being tested in this pilot are: Adult Care Worker, Early Years Educator, Data Technician, Carpentry and Joinery, and Assistant Accountant. As at the publication of this report the new assessment plans for Early Years Educator, Data Technician and Assistant Accountant have been published.

In June 2025 Ofqual published a consultation on its proposals for how to accommodate the revised approach to assessment within its regulatory approach.[12] This consultation closed in August and Ofqual's decisions in response were published in December.

WHAT IS CURRENTLY WORKING WELL

Before we consider the impact that the reformed approach will have, it is worth considering what is currently working well about the EPA system and, conversely, where those involved in it feel it is currently not working well and could be improved.

At a fundamental level all of those we spoke to felt that EPA as currently designed and operated provides a robust assessment of an individual apprentice's occupational competence. Ofqual regulates EPA across a wide range of standards and has not taken significant regulatory enforcement action in regard to EPA delivery, which suggests that EPA is meeting its stated purposes and being delivered effectively in most cases. Many interviewees cited the fact that employers like and respect EPA as a particular merit of the current system, although others also reflected on operational issues some employers face.

Concerns raised about the current system were largely operational, and in some cases related to specific sectors, individual standards or EPAOs. Some interviewees felt that EPA was a robust assessment but 'gold plated', especially given an apprentice has already been signed off by their employer as competent through the gateway process. Arguably, in some situations, EPA can be perceived as merely a quality assurance of the gateway, rather than the independent synoptic assessment it was designed as. However, the presence of an independent assessment has, we

11 New Assessment Plan Structure – GOV.UK

12 Regulatory framework for apprenticeship assessment - GOV.UK

believe, set expectations across apprenticeship delivery and driven a focus on quality of training for apprentices in a way that would not be the case where sign-off was purely through the employer gateway.

INDEPENDENCE OF ASSESSMENT

Independence is one of the fundamental principles of EPA and something government should think very hard about indeed before resiling from. Everyone we spoke to cited independence as a strength of the current EPA system. This was seen as both a positive design feature of the overall system and also something that was working effectively in practice. EPAOs, training providers and others felt that having someone who had not been involved in the apprentice's training or employment sign them off as competent underpinned the validity and reliability of the assessment and moved away from the reality or perception that providers were 'marking their own homework' in the previous system. They also felt it gave EPA credibility and a sense of fairness in the eyes of apprentices and employers.

Independence of final assessment and certification is also a feature of well-regarded apprenticeship programmes, including in Germany where employer chambers oversee final assessment and run independent examination committees for each occupation;[13] in Switzerland where final exams are supervised by the cantons and professional organisations;[14] and in Austria where practical exams are taken in front of a board of examiners.[15]

Several people noted that the independence requirement inflated the number of skilled individuals required in the process (because separate people are needed to train and assess) and that in the transition to apprenticeship standards this had caused challenges with the availability of assessors in some sectors. This is a genuine risk of an independent system but is not one most felt to be a significant systemic problem now, although in certain niche occupations it can still present challenges.

EMPLOYER INVOLVEMENT

Employers are the custodians of apprenticeship standards and key customers of EPA. In addition to setting and maintaining these standards, they play a critical role in delivering training by supporting apprentices through structured on-the-job learning and ongoing development. If employers lose faith that an apprentice who has passed EPA is genuinely occupationally competent or that different apprentices assessed against the same standard can be treated comparably, the system will fail.

Everyone we interviewed identified employer engagement and confidence in apprenticeships as an essential facet of their success. Several people emphasised the importance of genuine employer involvement rather than working through intermediaries, such as sector skills councils, as was the case in the frameworks era.

Nearly everyone we spoke to felt that the level of employer engagement in the system was, on the whole, a benefit. The fact that assessment plans are designed by groups of employers improves the robustness and relevance of assessment in the eyes of employers. However, it is also recognised that a number of employers, particularly those outside the Trailblazer groups, feel excluded from the process and believe that alternative approaches would better reflect the needs of their sector.

13 Federal Institute for Vocational Education and Training (BIBB) - Germany
14 Federal Institute for Vocational Education and Training (BIBB) - Germany
15 Federal Institute for Vocational Education and Training (BIBB) - Germany

Most EPAOs and training providers feel that employers value EPA as a process for their own apprentices and view the results as credible.

Again, deep and thorough employer involvement in the process of designing apprenticeship content is the hallmark of other European apprenticeship systems. Indeed, the involvement of employers, through chambers and other mechanisms, alongside employee representatives and trades unions is generally a more deeply embedded aspect of these systems than is the case in England.

Some expressed the view that the differences between EPA and other qualifications could be confusing and frustrating for employers, for example the fact that EPA can take place at different times for different apprentices, even on the same standard with the same employer, and that there was significant variation in how quickly results were available. Others felt that this 'on demand' nature of apprenticeship EPA provided beneficial flexibility to employers and that effective communication from EPAOs should mitigate confusion. Equally, there is a benefit in the fact that EPA is an individualised assessment, taken at the point an individual apprentice is ready for it, allowing for more personalised learner journeys through the standard. A model whereby an 'exam period' was set in which all EPA took place would have compromised this flexibility, as well as potentially leading to challenges with assessor availability in some sectors.

REGULATORY OVERSIGHT

Most people we spoke to felt that the current regulation of EPA was effective and efficient. In the early days of apprenticeship standards, EPAOs did not have to be Ofqual regulated, but since changes set out in 2020 all EPAOs have been brought within the scope of Ofqual (or OfS) regulation, with a few specific exceptions. EPAOs felt that this system was simpler for them to engage with and clearer and more consistent across different apprenticeship standards.

EPAOs felt that the regulatory barrier to entry was appropriate and achievable and that the system gave confidence to employers and apprentices. Some concerns were raised about the capacity and willingness of the current system to provide external quality assurance and standardisation activities.

WHAT COULD BE IMPROVED

Several challenges with the delivery of EPA were raised during our discussions.

ADMINISTRATIVE CHALLENGES

Training providers face a number of operational and logistical challenges with the delivery of EPA, including having to negotiate different platforms for different EPAOs, variable quality of 'customer service' from different EPAOs and availability of materials from them. On the whole, those we spoke with recognised this as natural variation between EPAOs, and it was acknowledged that on standards with more than one registered EPAO, training providers could move EPAOs if they felt they were not getting a good service – several training providers we spoke to had done this in recent years.

The timeliness of assessment was identified as a concern by some training providers. This was largely driven by assessor availability and noted as a particular challenge on certain standards, for example in niche sectors where relatively

few individuals have the necessary expertise to conduct assessment or where observation is an assessment method and delivery is geographically dispersed. Most people we spoke to felt that assessor availability was not now a system-wide concern and that historic issues with both willingness of EPAOs to take on standards and availability of assessment once they had were largely resolved.

COSTS

The costs associated with EPA are high compared to other qualifications. As noted above, training providers are expected to reserve up to 20% of the training cost for EPA, though in reality the average is less than this. There are various reasons for this, including the costs of recruiting assessors in different sectors and the costs of providing the space and materials for practical assessments. More systemically, several people noted that the individualised nature of much EPA drives costs by requiring, at times, a one-to-one ratio of assessor to apprentice, where this is specified within assessment plans. And some assessment plans have driven the costs of assessments of particular standards by making detailed requirements of the assessment that needs to take place, requiring every individual KSB to be assessed or requiring a high number of assessment methods.

The use of observation of workplace practice was cited as a particular driver of costs. Whilst it was acknowledged that these could be valuable for assessing occupational competence, some EPAOs felt that the overuse of this assessment as a 'default' method in assessment plans was driving costs and causing delays in delivery.

Some people queried the value for money of this assessment when an apprentice's employer has already signed them off as competent at the gateway. This has led to a perhaps artificially high pass rate for EPA because apprentices are only put forward for the assessment who should pass. Ofqual reports the overall first-time pass rate for EPAs that it regulates as 89.7% in 2023–24, although this ranges from 95.7% at levels 6 and 7 to 86.8% at level 4.[16]

Similarly, the duplication by EPA of assessment that had taken place through qualifications taken during delivery was felt to be unnecessary, to place additional burden on apprentices and to artificially increase the costs of apprenticeships.

ASSESSMENT PLANS

The quality of assessment plans and their usability as documents from which to design valid and reliable assessment varies between standards. Several people we spoke with identified the rigidity of assessment plans as a challenge, citing problems with very detailed and prescriptive requirements leading to overassessment in some cases. This included the requirement to assess every individual KSB, which several interviewees considered excessive and, indeed, not necessarily conducive to holistic assessment of competence in the most efficient way.

The fact that assessment plans are designed by employers is a mixed blessing. On the one hand, it is crucial to ensuring that the nuances of particular sectors are captured in the assessment. This in turn is important for securing employer buy-in to the process and confidence in the outcomes of assessment. However, on the other hand, several people raised the fact that, whilst there is value in employers designing the content of the apprenticeship standard, they were not

16 Apprenticeship end-point assessments statistical report: March 2023 to February 2024 - GOV.UK

the right people to design assessment plans. These concerns have existed from the original introduction of standards-based apprenticeships and have been raised by Trailblazer employers themselves.[17] In order to address this, access to assessment experts is provided via Skills England and training providers and EPAOs can now join Trailblazers. Several people we spoke to felt that this had led to increasingly usable assessment plans although some EPAOs expressed frustration that whilst they were now involved in Trailblazer discussions, primacy was still given to the employer. Furthermore, a number of people noted that early assessment plans, developed by employers with limited assessment expertise were still extant in the system. Some EPAOs had decided against offering specific apprenticeship standards because they felt that they would not be able to comply with the requirements of the assessment plan and deliver valid and reliable assessments.

LACK OF STANDARDISATION

It was noted above that most people we spoke with felt that the regulation of assessment, in particular by Ofqual, was proportionate and appropriate. However, a number of people noted that the system is different to other qualifications in the level of quality assurance of assessment and where responsibility for this sits. In many other assessments, a significant proportion of assessment delivery is conducted by a training provider operating as a 'centre' for an awarding organisation and providing a range of external quality assurance (EQA) functions, such as standardisation and sampling. The awarding organisation is then subject to regulation by Ofqual. In EPA, where the assessment is designed and delivered by the same organisation, internal and external quality assurance sit in the same place and the system relies on the internal quality assurance arrangements of EPAOs and Ofqual regulation.

Some EPAOs feel this is something that has been lost in the move from a system of multiple EQA bodies to most EPA being regulated by Ofqual. Whilst these EQA bodies were mixed in overall quality and fidelity to a consistent approach, the standardisation that some bodies had provided across a standard was felt to be important. Equally, some EPAOs felt that there had been value in the early days of EPA in having an external organisation with which they could engage on standard-specific issues in a different way to how they might engage with the regulator.

SEQUENCING OF ASSESSMENT

Finally, some people felt that the requirement for all assessment to take place at the end of the apprenticeship was a problem. They felt that this put a significant pressure on individual apprentices for their entire apprenticeship to hang on one high-stakes assessment. Others added that this approach missed opportunities to use valid and authentic assessment events which took place on programme. Finally, it was felt that this contributed to challenges relating to booking in assessment and availability of assessors by concentrating EPA at particular times of the year, particularly for providers who operated on an academic year timetable.

17 BIS research paper 256: Process evaluation of the Apprenticeship Trailblazers

WHAT PROBLEMS DO THE REFORMS SEEK TO ADDRESS?

As outlined in the previous section, EPAOs and training providers we have spoken to as part of this work identified a number of areas in the current EPA system that are not working optimally or where they think improvements could be made to strengthen it. It is worth considering the extent to which government's stated reasons for introducing the reforms align with these areas or whether there are additional or different drivers for the DfE.

WHAT RATIONALE HAS GOVERNMENT GIVEN FOR THE REFORMS?

Reform of apprenticeship assessment was announced by the DfE as part of a wider package of reforms in February 2025 to coincide with National Apprenticeship Week. Other reforms announced at the same time included reducing the minimum duration of apprenticeships from 12 months to 8 months and giving employers flexibility over whether apprentices over the age of 19 would need to complete Level 2 English and Maths. The overall theme of this package of announcements was reducing bureaucracy for employers, and to some extent training providers, and providing a smoother service for apprentices. This announcement sets EPA reform in this context, describing it as being introduced with the intention of 'making the system simpler and more flexible while ensuring apprentices prove their competence for skilled work.'[18]

The tenor of these announcements clearly plays into a view that apprenticeship take-up and completions are being suppressed by rules and bureaucracy and that removing these will support the government's growth ambitions and industrial strategy.

This does appear to align with an aspect of concern with the current system raised by stakeholders we spoke to as part of this work. Training providers in particular cited complexities of engaging with multiple EPAOs, and several people we spoke with felt that greater flexibility could be provided over when assessment is allowed to take place during the apprenticeship.

Several stakeholders we spoke to as part of this work expressed the view that the rationale for the changes had not been clearly communicated by the government. It is worth considering if this is a fair criticism. On the one hand the rationale above gives a clear headline relating to reducing bureaucracy and red tape. But at the same time, this is perhaps rather a limited explanation of a potentially significant change, and it is legitimate for the sector to seek further detail.

It is certainly true that the reforms and assessment principles were announced through press releases on GOV.UK rather than as part of a wider strategy document or white paper. They did not they come on the back of a public consultation exercise – though clearly the DfE had engaged in conversations with employers and providers in developing the reforms – nor had changes to EPA been publicly identified as a significant priority ahead of the announcement. For example, they were not in the Labour Party manifesto prior to the 2024 General Election or in other documents produced by or for the party in opposition, where the focus was on reform of the Apprenticeship Levy into a Skills and Growth Levy. And they were not particularly trailed in speeches from government ministers or

18 More red tape slashed to reduce apprenticeship bureaucracy - GOV.UK

in the parliamentary debates on the transfer of IfATE functions to Skills England, although reference was made by a government minister in December 2024 to government wanting to 'continually improve other areas of apprenticeships, including end-point assessment, to ensure that they are robust yet proportionate and aligned with key professional qualifications.'[19]

WHAT DO STAKEHOLDERS BELIEVE IS DRIVING THE REFORMS?

Beyond the stated rationale of simplification and reduced bureaucracy, a number of other areas were cited in our discussions as things that people believed were drivers for the reform.

Everyone we spoke with assumed that reducing costs across the apprenticeship system was at least a contributing factor in the DfE's plans if not the primary driver. In July this year it was reported that the DfE's 2024–25 apprenticeship budget overspent by 2% (£52m),[20] following several years of speculation that this would happen.[21] The DfE has been careful not to explicitly cite this as a rationale for the reforms, but given the overall fiscal environment and wider pressures on DfE budgets, including the apprenticeship budget, it is reasonable to assume that reductions in overall costs as a result of the reforms would be welcome to government.

Whether or not the DfE sees cost reduction as a significant driver – and, as we will discuss in the next section, there is not a consistent view that the reforms *will* reduce costs – the current high costs associated with EPA were cited as a concern by training providers and other organisations we spoke to, and EPA is objectively expensive compared with other qualifications. Some people we spoke to also noted that given the high pass rates, the DfE may not see EPA as a good value-for-money validation of competence.

Others felt that the DfE was keen to align apprenticeship assessments with other forms of assessment, including the approach used in other vocational qualifications but also in academic qualifications. Some felt that the DfE saw this consistency as a good in itself and would increase the esteem of EPA including with employers.

Finally, several people expressed a view that the DfE thought availability of assessors and assessment in a timely manner was a problem in the current system which could be alleviated by reducing the need for external assessment at the end of the programme and by using on-programme activity to a greater extent. As noted above, whilst timely availability of assessors was noted as a challenge by some, this was largely in regard to specific sectors and standards, and the idea that this represents a system-wide challenge was felt to be largely historical.

19 Trades and Apprenticeships - Hansard - UK Parliament

20 DfE raids budgets to cover 'landmark' apprenticeships overspend

21 For example The apprenticeships programme

WHAT OPPORTUNITIES DO THE CURRENT REFORMS PRESENT?

The current reforms to EPA represent a significant change to apprenticeship assessment. As outlined above, there are some aspects of apprenticeship assessment that currently present challenges, and so there are some potential benefits of the proposed approach. In line with the government's stated rationale for the reforms, people we spoke with largely saw these in relation to increased flexibility and removal of duplication. In our discussions most people noted that relatively little detail had been provided by government on how the reforms would be implemented, beyond the proposals in Ofqual's consultation and Skills England's assessment plan template. Comments on the potential opportunities and risks should thus be understood to have been made in the context of limited detailed information.

FLEXIBILITY ABOUT WHEN ASSESSMENT TAKES PLACE

On the whole, people we met with felt that the proposal to allow on-programme assessment to count towards the apprentice's overall grade could be a positive change. This could reduce pressure on apprentices and ease scheduling pressures on EPAOs as well as allowing for the capturing of practice within authentic work-based settings, rather than recreating this through artificial scenarios specifically set up for EPA.

Although the idea that assessment should take place exclusively at the end of the apprenticeship has formed a central principle in the delivery of standards (and is reflected in the current name 'end-point assessment'), it is worth noting that this was not necessarily the original intention. Indeed, the original government implementation plan only committed to assessment 'largely' taking place at the end of the apprenticeship, suggesting that at least two-thirds of the assessment should take place at the end.[22]

We consider it essential that a substantive assessment should still take place at the end point, not least because this would best facilitate synoptic assessment. Ofqual's consultation *Regulatory Framework for Apprenticeship Assessment* sets out a series of proposals to address this issue. But we can cautiously welcome the idea of more account being taken of earlier activity too.

On-programme assessment would likely be carried out by the training provider, and the new assessment principles explicitly allow for this. There may be capacity benefits here as well as other positives, such as better integration with the apprentice's learning journey and closer collaboration with their employer to align assessment with workplace realities. We are concerned, though, that provider-delivered assessment also presents a number of important risks relating to consistency, independence and capacity, and these are discussed in the next section.

REMOVAL OF OVERASSESSMENT AND DUPLICATION

People felt that the proposals included some important and potentially beneficial changes which would reduce duplicative and excessive assessment. For example, the current requirement for every KSB to be assessed through the EPA was felt to be unnecessary, and to have both continued some of the 'tick box' approach

22 The Future of Apprenticeships in England: Implementation Plan

to assessment seen during apprenticeship frameworks and also inflated the complexity and costs of EPA. Interviewees felt that occupational competence could still be tested in a holistic and synoptic manner without this stipulation.

Some assessment plans probably require more assessment across more methods than is necessary. It is not clear, for example, that it is proportionate for apprentices on Level 2 Sports Turf Operative to complete four assessment methods as part of EPA. The reforms present an opportunity to rethink some of this and deliver more proportionate assessment with knock-on benefits on cost and deliverability.

Similarly, the proposal not to require re-assessment of material that has already been assessed, for example through mandatory qualifications taken during the apprenticeship, could provide a positive reduction in burden and opportunity for efficiency. This is likely to be an area where differences emerge on what is acceptable between different sectors: whilst most people instinctively say they are in favour of reducing duplication, they may reserve judgement until they see how this is operationalised in their sector.

It is worth thinking about how effectively duplication can ever be removed from the final assessment. For example, an aspect of knowledge could be assessed on programme (such as knowledge of health and safety laws and procedures), but this may also be displayed in a final observation or, more problematically, ticked off on programme but then *not* displayed as it should be in the final observation. EPAOs are at present unclear how this should be accounted for, and it potentially puts them in a difficult position.

IMPROVING ASSESSMENT PLANS

Assessment plans, set by employers, are an important feature of the current EPA system but are not present in any other part of the education system. They establish the assessment methods to be used and various rules and parameters which should apply to these. As noted above, a number of concerns were raised with the suitability of assessment plans as a means of designing valid and reliable assessment. Although people felt that these had improved since the early days of standards-based assessment, they still saw the opportunity for improvements through the current reforms.

In particular the opportunity to apply consistent rules to EPA was cited, moving away from a system where rules around ordering of assessments and resits/retakes policy were inconsistent between different assessment plans for no obvious reasons.

Notwithstanding the fact that people saw a number of opportunities to improve assessment plans, there will be risks to having much shorter and less detailed assessment plans and questions about whether these can secure consistency. These are discussed below.

WHAT RISKS DO THE CURRENT REFORMS PRESENT?

The current reforms present a number of risks which government will need to mitigate if the reforms are to be a success

In particular, three aspects of the reforms seem to us to present areas of potential risk. These are the proposal to reduce the detail included in assessment plans; changes to permit delivery and marking of assessments by training providers and employers; and allowing some assessment to take place on programme. Each of these changes presents risks to principles which have until now been seen as fundamental aspects of EPA, namely consistency, independence and synopticity. Furthermore, they present capacity and capability challenges for different actors in the sector.

INCREASED COMPLEXITY AND INCONSISTENCY

A key feature of the reforms is increased flexibility. We consider it axiomatic that this increased flexibility, whether in itself it is a good thing or not, will lead to increased variation in how assessment is delivered and increased complexity, for both those within and those outside the system seeking to understand it, driven by this variation. This will need to be appropriately managed by Skills England and Ofqual.

In the EPA system as it has evolved to date, a significant premium has been placed on consistency of assessment. In the original post-Richard Implementation Plan, the DfE and BIS stated that 'just as there will be a single Apprenticeship standard for a given occupation, there will also be a single approach to assessment against that standard. This consistent approach will be a vital part of securing greater employer buy-in to the new employer-led Apprenticeships.'[23] Similarly, Ofqual's 2017 guidance for Trailblazers stated that assessment plans were intended to provide that 'the requirements of EPAs will be consistent, across locations and over time; and where relevant, different EPAOs will interpret the requirements in a consistent manner.'[24]

This consistency has been assured in two ways:

- Increasingly detailed assessment plans developed by Trailblazers have set out how each standard should be assessed.
- Confirmation that all EPAOs are following the relevant assessment plan and delivering the EPA consistently has then been sought through external quality assurance, previously provided by a range of bodies and now replaced by various regulatory regimes (primarily Ofqual and OfS).

The reforms will introduce greater scope for flexibility. There are some positives in this. As noted above, views on assessment plans varied amongst the people we spoke to, and whilst some felt that they were helpful and appropriately detailed, others considered they had become overly prescriptive and restrictive. But this flexibility will unavoidably lead to greater variation in how assessment is developed and delivered by changing the dynamics on both of the aspects which have sought to deliver consistency to date. Firstly, the reforms mean that assessment plans will provide less detail on how assessment should be delivered. Secondly, they mean more people and organisations will be involved in assessment delivery, placing greater demands on the quality assurance system.

23 The Future of Apprenticeships in England: Implementation Plan
24 Ofqual report

ASSESSMENT PLANS

Assessment plans have increased in length and level of detail significantly over the last decade. Early assessment plans were in some cases only 10 pages or fewer and allowed (intentionally or not) significant latitude in how some assessments were delivered. Ofqual's 2018–19 EQA report found 'Where assessment plan design allows for wide variances in approach to EPAs, there is a risk to the consistency of outcomes and therefore confidence of those employers and apprentices interpreting and using the grade of their EPA.'[25] And IfATE's 2020 EQA report acknowledged that 'Some older end-point assessment plans could provide greater detail and clarity to allow EPAOs to develop high quality, authentic and consistent end-point assessment.'[26] Over the intervening years, significant work has been undertaken by IfATE, Ofqual and other EQA providers to strengthen assessment plans, which now provide significantly more detail and thus, supplemented by regulation of assessment design and delivery, significantly more assurance that apprentices on the same standard will be assessed consistently.

The current reform principles state that assessment plans will be 'short (e.g. 2 pages) and high level, containing the minimal prescription of assessment required to demonstrate occupational competence.' Skills England has published a template structure for what these assessment plans will look like.[27] This will place much greater onus on EPAOs to develop their assessments based on their own judgement of what is appropriate. This risks diluting the voice of employers in defining how competence should be assessed. Furthermore, it means that on a standard with multiple EPAOs, there is bound to be greater variation in assessment design and delivery than at present, with different EPAOs making different judgements on various parameters around assessment methods. In fact, far from reducing the overall documentation per standard, this will increase significantly: each two-page assessment plan will need to be complemented by, in effect, an assessment plan per assessment organisation. That will not be simpler to administer and it will not be simpler for employers to see, as they now can, in one place how all apprentices on a standard will be assessed.

To some extent, allowing some flexibility is reasonable. Assuming that assessment plans continue to stipulate the methods to be used, small variations in how these are designed are unlikely to compromise validity and, in fact, may be beneficial by allowing for more context-appropriate approaches. However, in the absence of clarity on how such variety will be managed, a number of risks stem from this. Firstly, that it risks undermining EPA in the eyes of employers and apprentices if competence is assessed in different ways for the same occupation, compromising the perception of consistency and fairness. Flowing from this, and more concerning, is the risk that this inconsistency drives a 'race to the bottom', with some EPAOs increasing market share by developing assessments which are perceived to be less rigorous. Some assessment organisations we spoke to felt that, even with the current level of prescription in assessment plans, there is variation in delivery between EPAOs and current quality assurance and regulatory arrangements are not sufficiently 'on the ground' and are overly dependent on self-reporting by EPAOs. Whilst most people we spoke with did consider the regulatory arrangements to be appropriate and robust, it will be important for Ofqual, the OfS and other providers of EQA to continually review that their approach to EPA

25 External Quality Assurance of Apprenticeship End Point Assessments, 2018-2019

26 External Quality Assurance Annual Report 2020

27 New Assessment Plan Structure – GOV.UK

is sensitive enough to identify intentional and unintentional lack of compliance with assessment plans and to take judgements on comparability between different assessment approaches.

ASSESSMENT DELIVERY

Furthermore, other aspects of the reforms introduce further potential for inconsistency. At present all EPA is delivered by the EPAO itself, which is therefore entirely responsible for assessment design and delivery and for the recruitment, training and standardisation of those who undertake it. The reform's introduction of the ability for employers and training providers to assess some aspects of the apprenticeship inevitably brings more individuals and organisations into the delivery of assessment, including people who are not in the direct control of the EPAO, and scatters accountability across the system. This increases the risk that individuals come to inconsistent judgements about apprentice competence and places a greater and more complex demand on the EPAOs' quality assurance regime. The regulatory regime and in particular Ofqual's Centre Assessment Standards Scrutiny (CASS) requirements will be important in seeking to mitigate this risk on the standards that they oversee.

Quite apart from the risks to consistency of bringing in more and more varied individuals, the complexity the new system will engender is mindboggling. Every EPAO will need to agree different approaches to assessment for different training providers and employers based on the capacity and capability of those training providers and employers to deliver assessment. So, for example, the same EPAO, on the same standard, may agree that one provider can assess certain parts of the standard and that another provider can assess fewer or different parts of the standard, based on the EPAO's assessment of the provider's capacity and capability. This will be hugely complex for assessment organisations to manage, as within the same qualification they will need to be acting as an awarding organisation in some cases (i.e. managing assessment delivered by a centre) and in other cases acting more like an EPAO (i.e. delivering the assessment themselves). How they will manage this and how Ofqual will regulate such diverse assessment practice within the same qualification remain somewhat unclear.

In the case of employers, the concern was raised that larger employers might push for employer-specific assessment, which would not test the apprentice's overall occupational competence and may not prepare them to work in other parts of the same industry.

Authentic assessment of behaviours in a one-off assessment has always been a challenge for EPAOs, and several people we spoke to felt that, in principle, proposals for employers to assess behaviours were helpful. However, limited detail has been provided so far on how this will work and what assurance, if any, EPAOs will need to do of this assessment to ensure it is delivered in a consistent manner. Ofqual's proposed regulatory approach assumes that EPAOs will have no role in assessment of behaviour or oversight of employers' assessment of it, but a number of people in our discussions felt that this was not sustainable and that EPAOs would need to have some assurance of this in order to fully assess occupational competence. The obvious vehicle for behaviours to be assessed holistically would be the gateway, but in a system with such a variety of assessment happening on programme and at the end point, it is unclear whether a gateway will continue to form part of apprenticeship assessment.

MITIGATION OF CONSISTENCY RISKS

As outlined in the previous section, the sector does see some opportunities in shorter, more consistent assessment plans and the permitting of assessment on programme by training providers. However, the risks outlined above are significant and will need to be effectively mitigated for the reforms to deliver their full potential.

Further government guidance, jointly produced by the DfE, Skills England and Ofqual, is likely required on certain aspects, in particular how employers are expected to assess behaviours in a consistent manner that does not place undue additional burden on them. And what role EPAOs should have in supporting consistency of this assessment.

Skills England will need to consider carefully the implementation of shorter assessment plans and treat the five test standards as a genuine pilot, with the scope to revise their approach if it is not proving effective. This should continue into delivery with a clear review point, not just of how the assessment plan looks on paper but on how it is actualised in delivery.

Ofqual has reviewed its approach to the regulation of apprenticeship assessment through the consultation it held over summer 2025. As part of this, we suggest it should consider taking a greater role in upfront review of assessment strategies and materials, as well as undertaking more evaluation of assessment in delivery. Whilst Ofqual's regulatory approach is risk based, we consider that the current reforms present significant risk to an already novel form of assessment.

REDUCED INDEPENDENCE

The reforms allow for both the employer and training provider of an apprentice to be involved in the assessment of apprentices. Whilst this does not in itself directly compromise independence of assessment, it undoubtedly creates greater risks that it will be compromised and requires greater vigilance by all parties to ensure that this risk is mitigated.

Like consistency, independence has been a watchword of EPA from the beginning. Every government publication since the Richard Review has emphasised the importance of EPA providing independent verification that an apprentice is occupationally competent. Perhaps more importantly, it was cited in all of our discussions as a feature of EPA that is currently working well, is valued by employers and apprentices, and should be maintained in any future system.

At present, independence of assessment is maintained by requiring a different organisation to the apprentice's employer or training provider to provide the assessment. The reforms will allow training providers to assess and mark aspects of the apprenticeship and allow employers to routinely assess apprentice behaviours.

A number of training providers we spoke with felt that allowing them greater involvement in the assessment of apprentices was reasonable and that they had robust safeguards in place to manage conflicts of interest. Others, including some training providers, raised concerns that even where this is assiduously managed internally, employees of the same training provider could still face an incentive to mark an apprentice favourably. This is both because of the high-stakes nature of apprenticeship assessment to their employer (in terms of funding and reputation) and their relationship with their colleagues who had provided the training.

MITIGATIONS OF INDEPENDENCE RISKS

As above, Skills England will need to treat the implementation of new assessment approaches as a genuine pilot and be prepared to reflect and make changes based on the experience of the five test standards.

Ofqual will need to manage the risk that EPA is actually and perceived to be less independent. This will likely mean more detailed monitoring of conflict-of-interest approaches and analysis of success rates to monitor whether a shift to centre-based assessment leads to increased numbers of apprentices passing or changes in the profile of grades awarded.

REDUCED SYNOPTICITY

End-point assessment has, as the name suggests, taken place to date at the end of the apprenticeship. This was designed to counter one of the deficiencies of the previous approach where apprentices were assessed throughout their programme but without completing a holistic assessment that demonstrated that they could effectively combine things they had learnt.

The reforms propose that assessment conducted on programme will now be considered a valid part of the apprentice's assessment. As noted above, most of the people we spoke to were in favour of this change to some extent and for various reasons. However, it is inevitably harder for assessments earlier in the programme to bring together the full range of skills and knowledge and test the connections between them.

CAPACITY AND CAPABILITY

The concerns set out above are largely principles based and reflect characteristics of reformed apprenticeship assessment inherent in its design, not least as the interviews behind this research took place before any revised assessment plans had been published and clearly before any assessment had been delivered under the new regime. Alongside these, most of the people we spoke with raised some logistical and practical concerns, in particular about the requirements that the new approach will place on different parts of the system and whether these organisations have the capacity and capability to fulfil these requirements.

As set out above, under framework apprenticeships, apprentices were assessed incrementally and continually throughout their apprenticeship. This was done by staff from the training provider, often with job titles like 'assessor'. Awarding organisations oversaw this assessment through EQA processes and were accordingly resourced with staff trained in such processes. The introduction of EPA removed the need for colleges and training providers to employ assessors for their apprenticeship provision whilst at the same time creating a demand for assessment delivery experts in EPAOs (some of which were new and had not previously existed as awarding organisations).

As a result of this, a number of people we interviewed in both training providers and awarding organisations noted that there has been a transition of workforce in the last decade. Many training providers and colleges have reduced their assessor (and IQA) workforce with these people either retraining into teaching roles or moving to work at EPAOs. Similarly, some smaller or newer EPAOs which do not have significant business awarding other qualifications will have limited experience and expertise in the complex EQA function that they will now be required to deliver.

In the reformed EPA system, colleges and providers will need to deliver apprenticeship assessment again and will thus need to rebuild their assessor and IQA workforces through a combination of recruitment and training. And EPAOs will need to ensure that they have the necessary staff and expertise to deliver EQA. Neither of these shifts can take place immediately or at zero cost.

Finally, employers will be expected to take on an increased role assessing behaviours. Their capacity, willingness and ability to fulfil this role in a consistent, robust and independent way is likely to vary. EPAOs will likely need to provide training and guidance to employers to support them to deliver this in a way consistent with the assessment plan and the EPAOs' overall assessment strategy for the standard.

IMPACT ON COSTS

As noted above, the majority of people we spoke with felt that part at least of the rationale for the reforms was an effort to reduce the overall costs of the apprenticeship programme. Views on whether this would be true or not were mixed and most reserved judgement until more detail on the reforms and how they would be actualised on specific standards is available. Most people acknowledged that, in theory, reducing assessment burdens and duplications could reduce overall costs. However, some concern was expressed that the impact of reform would largely be to move costs around the system and that assessments currently provided by EPAOs would be provided by training providers instead, with assessment organisations picking up a greater role in quality assurance. As noted above, this necessitates some shifting of roles, expertise and individuals around the system, with resultant transition costs around recruitment, training and development of new systems.

CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

The reforms to apprenticeship assessment mark a significant change to the current approach, and a substantive redefining of a number of the core tenets that have underpinned apprenticeship assessment over the last decade.

Some of this is welcomed as refinement of a system that has been in place and evolved over a number of years. People we spoke with felt that the system was maturing and a degree of flexibility could be applied to previously rigid rules around what is assessed, when and by whom. However, it is also clear that independent, synoptic assessment is fundamentally the right approach to assessing the occupational competence of apprentices; that it bears comparison with the approach in other high-performing systems; and that it is valued by those who deliver it and, more importantly, by those who use and benefit from it, namely employers and apprentices. As a concept, it remains right even if some of the choices which have been made on some of the standards mean that the approach is overcomplicated, unwieldy and expensive in some areas.

In this context, these reforms are substantial, fundamental and probably over the top. Given that most people think that systemically EPA is the right approach and that individual standards could be refined, the current approach is a sledgehammer to crack a relatively small number of nuts. It seems unavoidable to conclude that a similar, perhaps greater, and certainly less disruptive improvement in assessment

delivery could have been effected by focusing on specific standards where problems have been identified rather than initiating a root and branch upheaval of over 700 standards. Nevertheless, government is taking this maximalist approach to reform, aspects of which pose risks to the actual and perceived validity of these assessments unless properly mitigated.

The reforms seek to deliver increased flexibility and simplicity. This is almost a direct contradiction. Increased flexibility may or may not be a good thing, but it will almost inherently lead to a system that is more complex and less consistent, with different assessment organisations assessing standards in different ways and having different arrangements across the training providers and employers they work with. Assessment organisations, training providers and employers will all have to take on different roles to now and have different relationships with one another. Two-page assessment plans may look simpler on a government website than current plans. But the system will not feel simpler to an employer confronted with not one document setting out how their apprentices will be assessed but, effectively, as many assessment plans as there are assessment organisations registered on that standard. It won't feel simpler to a college negotiating myriad EQA processes with different assessment organisations. And it won't feel simpler to an assessment organisation negotiating a bespoke approach to assessing the same standard with each training provider they work with. In time, government will perhaps realise that it is not a simpler system to manage or regulate either.

The new system will inevitably take time to deliver, and the transition to it will require investment. Perhaps the biggest risk to successful implementation is government failing to understand the scale of the change and allow the different actors across the system, including government agencies, the time and resource needed to deliver.

This is an important moment for government to reflect on its approach as policy and delivery responsibility transitions from the DfE to the DWP. Even where officials and ministers remain the same, policies inevitably bear the hallmarks of their sponsoring Whitehall departments. It has been a quirk, and perhaps a weakness, of the apprenticeship reforms of the last decade that these were conceived in the Department for Business, Innovation and Skills but then delivered under the auspices of the DfE. Reforms that imagined a world of employer-led validation of competence, quality assured by employer groupings and professional bodies, has ended up being interpreted and delivered through a lens of qualification design and education sector regulation. It will be interesting and important to see what the DWP lens on apprenticeship policy is and how this interacts with the current reforms. Whatever the approach taken, government should endeavour to build on the aspects of the current system that work well and are valued by employers, such as the independence and holistic nature of assessment.

RECOMMENDATIONS

In order to ensure that the reforms are delivered as effectively as possible we also recommend that government should do the following:

- ***Hold firm to the core principles of independence, consistency and synopticity.*** These principles have underpinned EPA to date and are fundamental to employer and apprentice confidence in the system. The reforms present several ways in which these principles could be undermined, but careful planning and oversight of delivery should allow that to be avoided. In order to do this government should:

- ***Treat the first standards as a genuine test.*** The initial standards which Skills England has published provide a good opportunity to test the approach. But these must be treated as a genuine test with the opportunity to go back and refine the approach if these identify problems, either with agreeing the initial plan or with designing, developing and delivering valid, reliable and consistent assessments using them. This means that their use in delivery needs to be considered and appropriate time needs to be allowed for this.
- ***Use the opportunity to apply greater policy consistency to assessment plans.*** Whilst there was some nervousness about the lack of detail that would be provided in assessment plans, the opportunity to provide greater consistency was seen as a key positive. Ensuring that a standard approach is taken to aspects of assessment where there is no genuine, occupation-driven reason for diversity (such as resit policy or assessment ordering) would help to apply greater consistency, even in the more complex environment driven by the reforms.
- ***Provide greater clarity through guidance on key aspects of the reform.*** Common threads throughout our discussions were the lack of detail that has been provided on the reforms since February and a perceived difference of views between the DfE, Skills England and Ofqual on how they should be delivered. A number of key areas will require detailed guidance to ensure they are delivered effectively, for example on how employers should assess behaviours and what role, if any, assessment organisations should have in overseeing this. Ideally, some of these would be produced jointly by the DfE, Ofqual and Skills England.
- ***Ensure Ofqual takes a greater role in monitoring consistency.*** The reforms create a significant risk that apprentices will be assessed to different performance standards by different assessment organisations and even within the same assessment organisation, depending on the relationship between that organisation and their training provider or employer. Some of this is tolerable but, particularly in the early days of the reforms, Ofqual will need to take a more interventionist approach to monitoring consistency and comparability than it has done to date. This is likely to include greater scrutiny of assessment strategies and relationships between assessment organisations and centres; greater review of assessment materials; and probably observation of assessment delivery and analysis of marking.
- ***Ensure Ofqual takes a greater role in monitoring the implications of centre-based assessments.*** The move to allow training providers and employers to undertake assessment increases risks around inconsistency (by bringing more and more varied individuals into the decision-making process on competence), but it also presents a significant real and perceived risk to independence. Ofqual will need to manage this risk very carefully, including through analysis of data on achievement rates and grade profiles and whether these change once centre-based assessment is introduced. And they will need to take action with assessment organisations to redefine their relationships with centres and EQA arrangements where this is not working well.

- ***Get realistic about timescales and sequencing.*** Skills England is a new organisation, and although it has inherited much of the staff and expertise of the Institute for Apprenticeships and Technical Education (IfATE), it is still finding its feet and is now coping with the machinery of government changes which will move it to

the Department for Work and Pensions. It has been working with Trailblazer groups for a number of months to develop five assessment plans in line with the new approach. The idea that all 700+ assessment plans will be revised by August 2026 seems at this juncture as unrealistic as the original commitment to review and revise all apprenticeship standards every three years. Government needs to set a realistic timeframe for this work based on early experiences of the first five standards, then prioritise standards for revision and clearly communicate the timescales and sequencing to allow the sector to plan.

- ***Communicate more and more widely.*** It has been striking in our conversations across the sector how varied the access to information about the reforms is. Some people sit on formal DfE groups or the Trailblazers for the five test standards, some leverage contacts in government to access information, most access sessions run by representative bodies, some are left in the dark. To allow the sector time to plan and prepare properly, government and its agencies need to communicate more often and more broadly than at present.
- ***Undertake proper evaluation of the impact of the reforms and collect the necessary data to do so.*** The introduction of EPA to apprenticeships was a significant change from the previous assessment regime. It is striking that no serious evaluation of the impact of this change appears to have been undertaken or to have informed current policymaking. Government agencies involved in the current reform should take the opportunity of the new reforms to collectively agree an approach that will be taken to the evaluation and to put in place processes to capture the necessary data.

ANNEX

The main research for this report was undertaken in late summer and early autumn 2025. This was at a point when the principles and objectives of apprenticeship assessment reform had been announced by government, but before detail had been provided or any new assessment plans had been produced. At that time, it was understood that Skills England was working with Trailblazer groups for five apprenticeship standards to develop new assessment plans in line with the principles. These were in the Adult Care Worker, Assistant Accountant, Carpentry and Joinery, Data Technician, Early Years Educator standards. Since that point, three of those new assessment plans have been published; Carpentry and Joinery, and Adult Care Worker have been paused owing to concerns from employers involved in the Trailblazers.

As well as the publication of the first three assessment plans, Ofqual has now published its decisions on the regulatory framework for apprenticeship assessment following consultation over the summer and its proposals (for further consultation) on the detail of how this would apply and guidance that should sit around this. Given the publication of the first assessment plans and greater clarity on Ofqual's approach, we have annexed to the report a short commentary on these three plans. This annex provides first some general comments on the new assessment plans and then specific comments on the three published so far.

GENERAL COMMENTS

New plans have been published for three standards out of a total of approximately 700 apprenticeships currently approved for delivery. Clearly this cannot be taken as a representative sample, but they do represent important differences in approach. All three are at level 3 but they represent different sectors with different traditions, requirements and links to professional status. The market for training provision and assessment differs significantly across the three. The legal and safety implications of apprentices being consistently assessed and achieving full occupational competency are different but, in each case, significant.

The overall approach set out in the three plans differs. Whilst the Early Years Educator and Data Technician plans propose new approaches to assessment that are specific to the apprenticeship, the Assistant Accountant plan delivers assessment entirely through the mandatory qualification (the Association of Accounting Technician's (AAT) Level 3 Diploma in Accounting).

The new plans exemplify a number of the new principles heralded in the February announcement and raise a number of other common issues.

SHORTER, LESS DETAILED PLANS

The new plans are certainly shorter than previous End Point Assessment (EPA) plans. The Data Technician plan has reduced from 39 pages to four pages; the Early Years Educator plan has reduced from 36 pages to four and a half pages. The Assistant Accountant plan has reduced from 30 pages to just over one page, although as noted above this plan is atypical.

Inevitably what is removed is detail relating to how the assessment methods should be designed, delivered and graded, and how knowledge, skills and behaviours should be mapped to specific methods. The current versions of the Early Years

Educator and Data Technician EPA plans have sections, longer than the entirety of the revised plans, detailing how, where and when assessments should be developed and delivered. This detail will now sit in the assessment strategies and qualification specifications of the individual assessment organisations which will deliver the assessment. Ofqual proposes to issue guidance to assist assessment organisations in taking assessment design decisions.

There are positives to this. From a regulatory perspective, requiring assessment organisations to more fully own the choices in assessment design allows them to take full accountability for these choices. However, it does also realise some of the concerns raised during our work about consistency and comparability of assessments. The lack of detail gives much greater latitude in design for assessment organisations, even with Ofqual guidance, which will increase variability compared to the relatively tightly prescribed parameters in most EPA plans. Furthermore, assessment organisation discretion over choice of supplementary assessment methods and almost all design choices within even the prescribed method will make it much harder for an apprentice or employer to straightforwardly understand how an apprenticeship will be assessed on a particular standard.

FEWER ASSESSMENT METHODS

The principles of assessment reform published in February set out that apprenticeship assessments would 'include the minimum number of assessment methods for validity'.[28] In the further information published in October this has changed to assessment plans naming only 'one required assessment method, allowing assessment organisations to select additional methods as necessary'.[29] This is a notable change and potentially places more strain on a single method to bear the whole burden of knowledge and skills assessment across the standard. Whether workplace observation will adequately capture, and be the best and most efficient method of capturing, the full knowledge requirements of some occupations, or whether written exams will adequately test the skills required for occupational competence remains to be seen.

Both the Early Years Educator and Data Technician list a short menu from which assessment organisations can choose a second method, and Ofqual's regulatory approach assumes that additional methods will be used. However, it is not clear how extensive use of additional methods will be. As KSBs are not, as is the case with current EPA plans, mapped to particular methods, it is unclear whether Skills England and the Trailblazer groups deem the mandatory method to be valid and sufficient for all mandatory KSBs. If they do, it is difficult to see what incentive an assessment organisation would have for using additional methods, given that this would increase the complexity and cost of designing and delivering their assessment and would likely make it less attractive to the apprentice. A number of people we spoke to raised concerns about the potential for new assessments creating a 'race to the bottom' whereby assessment organisations are incentivised to differentiate by offering assessment that is perceived to be easier or less onerous to organise and take. The choice of additional assessment methods feels like an area where this risk could take effect. We would hope that clear guidance from Skills England and Ofqual, and over time the informal 'case law' of Ofqual's agreement of assessment strategies can steer

28 Apprenticeship Assessment Principles – Apprenticeship Service Support

29 Changes to apprenticeship assessment, 2025 to 2026 - GOV.UK

the sector towards ensuring that all necessary methods are used to ensure valid assessment of occupational competence.

SAMPLING OF KNOWLEDGE AND SKILLS

Whilst EPA plans have required testing of all knowledge, skills and behaviours across the whole standard, the new assessment plans stipulate which knowledge and skills must be assessed. The remainder will be assessed by sampling. This does respond to concerns we heard raised about overassessment and duplication, but it also significantly reduces the scope of assessments. The Early Years Educator standard requires mandatory assessment of just six of 27 knowledge statements (22%) and the Data Technician standard six of 26 (23%). While, encouragingly, a greater proportion of skills components are assessed (13 of 21 in early years, and 10 of 16 in Data Technician), this does create a situation in which a large number of components, deemed by employers to be necessary for occupational competence, will only be sampled in the assessment.

As per the 'race to the bottom' concerns covered above, it is a risk that decisions on sampling could be driven by considerations of costs, including how easily they can be integrated into the mandatory assessment method rather than necessitating the use of an additional method. This risks training providers over time devoting less time to training for non-mandatory knowledge and skills which are perceived to come up less often in assessments. More fundamentally there must be a greater risk than at present that apprentices are deemed competent without having been required in their assessment to demonstrate key competencies.

GRADING

The new plans for Early Years Educator and Data Technician allow for grades of Fail, Pass and Distinction, removing the Merit grade present in the current EPA plans. Although this makes sense as neither of the component assessment methods in the current EPA plans are graded Merit – this grade only being available via combinations of Pass and Distinction – it potentially presents problems in being able to assess standards over time and may in the transition period make it less clear what apprentices assessed on the different plans have achieved and how their achievement is being differentiated.

The Assistant Accountant plan is only graded Pass or Fail. This removes both the Merit and Distinction grades from the current EPA, removing the ability for apprentices to demonstrate particular achievement, over and above the expected standard. Moreover it seems an unusual choice given the qualification which now provides the whole assessment on this standard does allow Merit and Distinction grades.

ASSESSMENT ORGANISATION CAPACITY

Given the timescales involved, there are very real challenges for assessment organisations, particularly those operating over a large number of standards, to develop robust assessment strategies and the necessary assessment materials. The very broad parameters set out in the assessment plans leave the burden for assessment design choices almost entirely with assessment organisations and this will entail significant specialist capacity over the next year for these organisations.

Beyond the design choices and strategy, developing new assessment materials will be a significant undertaking. Whilst sampling means that individual apprentices will not be assessed against all the knowledge and skills in a standard, assessment organisations will obviously have to develop variation of assessments to cover the whole standard (e.g. to design observation and scenarios which allow for testing of different combinations of non-mandatory elements).

At the same time, they will need to be adapting to a new way of operating in the apprenticeship space with the training providers they work with on different standards and agreeing appropriate quality assurance regimes for different organisations on different standards.

SPECIFIC COMMENTS ON THE FIRST ASSESSMENT PLANS

The comments above relate in different way to all of the new assessment plans. We now offer some comments on the specific assessment plans.

ASSISTANT ACCOUNTANT

The Level 3 Diploma in Accounting provided by the Association of Accounting Technicians (AAT) has been embedded as a mandatory qualification in this standard since the second version of the assessment plan. Previously the EPA additionally included a knowledge assessment and a professional discussion (underpinned by a portfolio). Apprenticeship-specific assessment has now been removed and the mandatory qualification is the only assessment of this standard. Some of the skills at present tested by the professional discussion and underpinning portfolio, for example around communicating financial information and evaluating the impact of this, or knowledge about the wider professional landscape, may be difficult to adequately assess through a written exam. This raises questions about whether they are core to occupational competence. In general terms, the extent to which skills are adequately tested on standards where the assessment is entirely conducted through embedded qualifications assessed by written exams will be an important consideration for Skills England and Trailblazers going forwards.

Moreover, it becomes difficult to see the attraction for a learner of taking the apprenticeship which lasts 15 months and can only be graded Pass or Fail, when the AAT Diploma typically takes 12 months to complete and the AAT website states can be completed in six months, and achievement in it can be recognised with Merit or Distinction grades.

DATA TECHNICIAN

The Data Technician plan requires assessment via a simulated task as the mandatory assessment method with assessment organisation discretion over whether to include additional assessment from a choice of: project; professional discussion; observation; portfolio. The EPA plan instead included a scenario demonstration with questioning (akin to the simulated task) and a professional discussion with underpinning portfolio of evidence.

The lack of detail on what the simulated task might entail, whether, as now, it might be supplemented by questions and the controlled conditions it should be taken under, mean that there is likely to be significant variation in how this assessment is delivered. Furthermore, it may not give the scope to test all of the knowledge and skills currently tested by the professional discussion (although the majority of these are deemed non-mandatory in the new plan).

EARLY YEARS EDUCATOR

The Early Years Educator assessment plan requires in-person observation in the workplace as the mandatory assessment method with assessment organisation discretion over whether to include additional assessments from a choice of: professional discussion; oral question and answer; case study based on child study; additional observation. It is not necessarily clear that solely observation-based assessment will be sufficient to test the mandatory knowledge elements of the standard, especially if an additional observation were selected as an 'additional' assessment method.

The use of independent observation in the workplace as an assessment method, though, is important and encouraging, both in allowing for valid and authentic assessment and for synpoticity. The plan stipulates that this observation must be independently assessed, although other methods may be assessed by training providers. We assume that this means that the observation must, in all cases, be undertaken and marked independently (of the apprentice, training provider or employer) i.e. by the assessment organisation. This would appear to go further than the general Ofqual requirement for 'approximately half' of the assessment to be independently assessed. The primacy of assessing child safeguarding in the plan is also important with nearly all knowledge and skills associated with this outcome included as mandatory elements of the assessment.

OPPORTUNITIES AND RISKS

Our report identifies a number of opportunities and risks stemming from the new approach to assessment. The publication of the first three assessment plans following the new principles, and of Ofqual's regulatory approach, now allows us to test the extent to which – on paper at least – those opportunities and concerns are being realised. How assessment organisations, training providers and employers respond to the assessment plans and develop and deliver assessments in line with them and with regulatory requirements from Ofqual remains to be seen.

The opportunities identified in our original report were increased flexibility and reduction in overassessment and duplication. The concerns highlighted include increased complexity and inconsistency; reduced independence and synopticity; and the capacity that would be needed to deliver the changes.

The assessment plans as published do not appear to mitigate the risks around complexity and inconsistency. Indeed it is certain that assessment organisations will design assessments with different parameters – and conceivably different assessment methods. The concerns expressed in our original report about a race to the bottom still seem live. Given the scale of work and tight timescales under which assessment organisations will be working there will be a risk that choices about additional methods and assessing of non-mandatory knowledge and skills may be driven by speed and cost. The use of a mandatory qualification as the only assessment in the Assistant Accountant standard does remove a consistency risk by restricting delivery to one assessment organisation, but has more fundamental implications for the value and attractiveness of the apprenticeship.

Concerns about the dilution of independence in the new assessment principles were raised often during our initial research. The new plans themselves do not explicitly mitigate or exacerbate this risk. Whilst the new plans do say that 'assessments may be designed to allow a centre or training provider to mark

assessments', the Early Years Educator plan stipulates that the observation must be 'independently assessed'. The extent to which independence is explicitly stipulated in future plans may vary by sector and assessment method. Ofqual's regulatory approach provides some mitigation of concerns here by requiring assessments to be set by assessment organisations and requiring approximately half of assessments to be marked by the assessment organisation. Ofqual also proposes further guidance on marking and conflicts of interest. What the assessment organisation marking half of the assessment means, and how complex this will be to deliver, will vary significantly by assessment method – marking half of the workplace observations on one standard will be quite different to marking half of the exam papers on another. Ofqual guidance may help here, but we would encourage the regulator to continue to focus on and support assessment organisations' internal and external quality assurance approaches and robustly review results and grade distributions within and between assessment organisations to satisfy itself that these have remained within reasonable tolerances.

The choice of assessment methods in these plans does go some way towards mitigating the concern that the synopticity of assessment would be diluted. Observation and simulation both allow some synoptic assessment. Furthermore, whilst the plans state that assessment can take place 'at any appropriate time during the apprenticeship', it seems likely that in both cases the assessment would take place as a single 'set piece' assessment very near to the end of the apprenticeship rather than using on-programme assessment extensively. This, however, does fail to realise one of the potential benefits of the assessment principles by not facilitating flexibility in when assessment takes place. People we spoke with felt that this had the potential to reduce pressure on apprentices and ease scheduling pressures as well as allowing for the capturing of practice within authentic work-based settings.

Reduction in the volume of assessment, by including only one method and limiting the amount of content which is mandatorily assessed, will likely reduce overassessment and duplication as well as reducing costs to some extent. However, there are likely to be some increased costs in the assessment expertise and time needed to design assessments from these plans, and in quality assuring their delivery.

CONCLUSION

Since the origins of apprenticeships in the Middle Ages it has been necessary to define a clear set of standards which an apprentice is expected to meet and to articulate a means of establishing that an apprentice has successfully acquired the knowledge and skills necessary to complete their apprenticeship. We believe that over the last decade in England the introduction of high-stakes, independent assessment at the end of the apprenticeship has been important for strengthening apprenticeships by delivering a means of establishing and externally demonstrating that an apprentice is occupationally competent and also by driving the content of training programmes to cover the whole gamut of knowledge, skills and behaviours deemed necessary for the occupation. It would be a concern, if going forwards, it became harder to understand how occupational competence was being defined if only a subset of knowledge and skills were being assessed.

The changes to apprenticeship assessment set out in February and now being implemented are significant and will entail a significant effort on the part of assessment organisations, training providers and others to deliver. Whilst the previous EPA system presented challenges and areas that could have been simplified

and strengthened, we continue to consider that these could have been resolved by addressing weaknesses in individual EPA plans whilst preserving the overall approach. Concerns about independence and consistency, whilst mitigated to some extent by the Ofqual regulatory approach, remain, and all involved in the delivery of apprenticeship assessment will need to work hard to ensure these concerns are not realised in order to preserve the quality and brand of apprenticeships.

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