



What next for End Point Assessments?

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Abstract

Purpose: This paper reflects on changes to End Point Assessment (EPA) brought about as a result of the COVID pandemic and considers how the proposed future changes will impact training providers and employers of health apprentices.

Approach: The paper provides an analysis of apprenticeship policy, the role of end point assessment and consideration of assessment strategies used in higher education and health professions. Implications for policy, training providers and clinical practice are proposed.

Findings: These changes will bring the completion of EPA closer to education providers and allow them to take a more direct role within the process. Education providers will need to be issued with clear guidance to ensure regulatory compliance. The pedagogical value of end point assessment is questioned.

Originality/value: Training providers and policymakers will need to review their processes and guidance appropriately. This paper provides a summary of salient points needing consideration.

Paper type: Viewpoint

Keywords: End Point assessment; nursing; apprenticeships; vocational training; skills

Introduction

End point assessments (EPA) are intended to be a synoptic assessment of an apprentice's learning; assessing the entire content of their apprenticeship and allowing the issue of a certificate of successful completion (Institute for Apprenticeships and Technical Education, 2017). Apprentices are only permitted to attempt the EPA after they have passed through the designated 'gateway' – a notional point in the apprenticeship where the apprentice is judged to have completed the required learning and is almost ready to enter their occupational role (Pearson, 2021). EPA is either integrated (completed as part of the degree apprenticeship) or non-integrated (completed independently to the apprenticeship at the very end) (Institute for Apprenticeships and Technical Education, 2020).

End Point Assessments are designed to measure the knowledge, skills and behaviours gained or exhibited by apprentices, as detailed in the associated apprenticeship standard (Institute for Apprenticeships and Technical Education, 2017). They should be a holistic assessment, ensuring an apprentice's competence in the role they will perform after completing the apprenticeship (Institute for Apprenticeships and Technical Education, 2017). The government recognised the introduction of an assessment at the end of the apprenticeship would be harder for apprentices, however, this was balanced with the need for a robust approach (Department for Business, Innovation and Skills, 2015). In our article, we define EPA as 'the final element of assessment undertaken by apprentices, designed to confirm that they have acquired the requisite knowledge, skills, and behaviours', which is undertaken by a registered End Point Assessment Organisation (EPAO). End point assessment and the organisations undertaking EPA are scrutinised through the Institute for Apprenticeship and Technical Education's External Quality Assurance (EQA) process, itself undergoing transformation, with Ofqual and the Office for Students (OfS) becoming responsible for oversight of apprenticeship, EPA and EPAO quality.

The Richard Review (2012) sought to redress previous criticisms of the apprenticeship scheme in the United Kingdom, including perceived flaws with the way the apprentice was assessed. Richard believed that continuous and time-consuming assessment devalued the accomplishments of apprentices, instead favouring a holistic final 'test' (Richard, 2012, p8). The government largely agreed with Richard's recommendations, requiring the main assessment of competence to take place at the end of the apprenticeship in line with outcome-based standards (Department for Business, Innovation and Skills, 2015). It should be noted that

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3 apprenticeship policy remains a devolved responsibility and therefore the changes discussed in
4 this article are applicable in England only, although the principles and implications have a far
5 wider reach.
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9 The Modern Apprenticeship scheme of the mid-1990s had received growing levels of criticism
10 for its format and management and employers' confidence had declined over time. Originally
11 designed to include a National Vocational Qualification and key skills certificate (Brockmann,
12 Clarke and Winch, 2010), the content of modern apprenticeships gradually expanded to include
13 sector-specific qualifications which employers deemed necessary to confirm competence
14 (Steedman, 2001). In 2001, the 'Technical Certificate' was introduced – an attempt by Sector
15 Skills Councils to increase confidence and address growing employer concerns about the
16 validity of the scheme (House of Lords, 2007). However, this resulted in apprenticeships
17 becoming a sequence of discrete elements of teaching and assessment, fragmenting the Modern
18 Apprenticeship scheme even further rather than increasing confidence as intended (House of
19 Lords, 2007). The introduction of the Technical Certificate suggested to employers that the
20 scheme was precisely as flawed as they had suspected and further changes were instigated,
21 leaving mainly the NVQ element as originally intended (Brockmann, Clarke and Winch, 2010).
22 Employer confidence with apprenticeships was low and apprentices were often removed from
23 the apprenticeship before its conclusion having completed only the areas of interest employers
24 deemed relevant (Fuller & Unwin, 2003; Wolf, 2011). This lack of confidence seems to have
25 been a fundamental driver of Richard's suggested reforms and the addition of the EPA became
26 one of the cornerstones of current apprenticeship policy as a result.
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41 Whilst degree apprenticeships were already in existence at the time of Richard's review and
42 subsequent reforms, there has been a marked rise in their popularity over the last few years
43 (Lester, 2020). Higher Education Institutions (HEIs) have fully embraced and engaged with
44 the development of apprenticeships, although the EPA has remained a contentious issue from
45 the beginning (Baker, 2019). Higher education qualifications already require a system of robust
46 student assessment, assuring employers, education providers and students alike that
47 educational standards have been maintained and achieved (Quality Assurance Agency, 2021).
48 This has largely resulted in the EPA becoming a necessary addition, particularly where the
49 issuance of the degree itself bestows the learner with the ability to achieve professional
50 registration or accreditation.
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3 Assessments as part of degree apprenticeships are a mix of both continuous and synoptic, rather
4 than having one single synoptic assessment at the end (as favoured by the government and
5 Richard). These assessments are used to confirm completion of an award, which could be a
6 level 4, 5, 6, or 7 qualification, before then needing to complete a synoptic end point
7 assessment. The juxtaposition of EPA and HEI assessments means that apprentices are over
8 assessed, as the capability and understanding of the learner have already been assured through
9 the higher education process.

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11 This article aims to critically evaluate current and future approaches to end point assessment,
12 considering recent changes to the end point assessment process for nursing (and other
13 professional or statutory regulated professions), and to discuss implications for HE practice,
14 clinical practice, government policy, and Education and Skills Funding Agency (ESFA) policy.

24 **Assessment for or assessment of learning?**

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27 Billett (1996) suggests that vocational learning as a concept should consist of a series of goals
28 that allow learners to develop both procedural and conceptual knowledge. Acquisition of both
29 types of knowledge is critical for learners to enter their chosen community of practice and the
30 use of learning goals and appropriate guidance enabling the achievement of the desired
31 outcomes (Hordern, 2015). The design of any curriculum, therefore, seeks to enable learners
32 to meet the desired outcomes, gain knowledge of their chosen topic and, in the case of
33 vocational education, enter their chosen profession. This transition from novice to expert has
34 been conceptualised in Benner's (1984) five-stage model which suggests that student nurses
35 pass through escalating levels of proficiency from novice to expert during their pre-registration
36 journey. This process is equally applicable to other professions. Conscious awareness of
37 knowledge and competence within the learner is critical to passing through these levels and
38 thus mirror Billett's (2006) goal-setting approach to vocational learning. The journey of
39 apprentices should be considered one of learning rather than education (Billett, 2006) and
40 viewed as preparation for a lifetime of future learning in the chosen occupational role. Both
41 perspectives are helpful in shaping understanding of the learner journey and how a 'staged'
42 approach to goal setting, achievement and evaluation enable vocational learners to become
43 immersed in their chosen community of practice (Lave and Wenger, 1991).

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Gibbs and Simpson (2005) provided a useful insight into the value of assessment in higher
education and highlighted how students are influenced by the assessment content in their

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3 programme. Miller and Parlett (1974) explored students' understanding of the assessment
4 process: perhaps not surprisingly noting that students invested more time on assessments on
5 which they placed greater value. There has previously been debate about the use of coursework
6 or examinations in higher education programmes, both having value (Ramsden, 2003).
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8 However, Gibbs and Simpson's (2005) study demonstrated that student outcomes in
9 coursework activity were more indicative of future work performance and long-term learning
10 than examinations.
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16 Hernandez (2012) distinguished between summative and formative assessment, with the
17 former being used for certification and the latter for learning. Terminology associated with
18 assessment is somewhat inconsistent, and the use of continuous assessment has been merged
19 with formative in some instances (Hernandez, 2012). Yorke (2003) notes that even summative
20 assessment can have formative elements, with the assessment contributing both achievement
21 of specified learning outcomes and student learning at the same time using feedback. To this
22 end, clarity of terminology (especially with EPA being classified as 'synoptic' rather than
23 summative) would be beneficial. Yorke (2003) presented a cohesive argument about the use of
24 both forms of assessment in education, but critical to both is the validity and reliability of the
25 assessment task.
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35 Although assessment provides a measure of student ability (or acts as a proxy thereof) (Boud,
36 2000), it has multiple functions. Yorke (2003) argued that not only is there an element of
37 constructivism within assignment tasks, but they also fulfil a fundamental epistemological role.
38 To this end, assessment could, in its broadest sense, be a mechanism by which to effect a
39 behavioural change in the learner. Kroepe (1988) explores the epistemology of assessment,
40 suggesting that assessment of knowledge via examination relies first on the assessor and
41 student having the same shared understanding and constructs of the items being examined and
42 secondly, that similar assumptions are made about the required or suggested answers. Gadow
43 (1995) notes that professions such as nursing need to bring together both general (or
44 underpinning) knowledge together with 'particular' (or situational) knowledge about a patient
45 to safely and competently administer care.
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55 To this end, the condensation of an extended period of personal learning and development into
56 a discrete period of assessment raises questions about both validity and reliability. End Point
57 Assessment is undoubtedly summative in its nature and, as is acknowledged by the Institute
58 for Apprenticeships and Technical Education (IFATE) (Institute for Apprenticeships and
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3 Technical Education, 2017), solely utilised as a means of certifying that learning has occurred
4 or competency achieved. Competency itself is a contested notion – does the ability to
5 demonstrate a particular skill under observation infer that the apprentice is fully competent?
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7 Gallagher, Smith and Ousey (2012) note that the reductionist approach of identifying discrete
8 skills that student nurses are assessed against ignores the complex mix of skills and personal
9 attributes suggested by the higher-level term ‘holistic competency’.

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15 Any reliance on End point assessment in isolation, therefore, to provide assurance that the
16 requisite knowledge, skills, and behaviours have been acquired and can be successfully
17 implemented needs to be contingent. End point assessment should perhaps be viewed as the
18 ‘threshold’ at which apprentices can safely practice more independently having completed their
19 apprenticeship. The assessment of understanding and the ability to apply learning appropriately
20 must sit elsewhere and to ignore these fundamental features of vocational education and
21 training surely threatens trust in the apprenticeship brand once more.

22 23 24 25 26 27 28 **International approaches to end point assessment (EPA)**

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31 Approaches to apprenticeships in continental Europe differ significantly from the English
32 model, with vocational education and training (VET) generally being held in much higher
33 esteem (Hyland, 2014). Young people can enter VET as part of their time in compulsory
34 schooling (in Germany this is termed the ‘dual’ approach to apprenticeships) – it is not just
35 reserved for those entering or already in employment (Hordern, 2015). As such, direct
36 comparisons between the English and continental approaches should be made with caution as
37 young people complete general qualifications as well as vocational assessments as part of their
38 apprenticeship (Hellwig, 2005).

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41 Unwin (2017) provided a comprehensive overview of international approaches to
42 apprenticeships and their assessment, with variability seen across Europe. In Denmark, for
43 example, discrete elements of learning are assessed with apprentices being deemed competent
44 in those areas and able to ‘step off’ and enter employment. Equally, they can step back into the
45 apprenticeship to further their learning within a specified timeframe. In contrast, assessment is
46 undertaken at the end of the period of learning in Germany. Switzerland uses a mix of both
47 continuous and end point assessment to evaluate the knowledge and skills of its apprentices.
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3 In Europe, there appears to be greater consistency in the administration of assessment and the
4 involvement of industry. Most countries studied by Unwin (2017) involve industry experts (the
5 equivalent of UK Sector Skills Councils) in the design of assessment, ensuring that employers
6 are equal partners in the assessment process, either continuous or at the end point. In that
7 respect, Richard's (2012) vision is closely aligned with European practice, but the definite
8 move away from continuous assessment sets England apart from its continental neighbours. In
9 most continental systems, there is a mix of continuous and final assessment, with a variety of
10 assessment methods being used to make judgements about the apprentice's knowledge and
11 competence in their chosen field (Unwin, 2017).
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20 The integration of a nationally recognised qualification studied as part of the apprenticeship
21 varies and not all countries align their apprenticeship scheme with higher education
22 (Andersson, Wärvik, and Thång, 2015; Jørgensenm 2017; Billett, 2016; Pilz, 2007). The
23 English approach to higher and degree apprenticeships, therefore, has unique elements, with
24 apprentices having the opportunity to achieve a higher education qualification as part of their
25 apprenticeship.
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31 In apprenticeships where the higher education award is a mandatory requirement of
32 professional registration, the dual approach may create tension within the system. Professional
33 and regulatory bodies such as the NMC already specified the requirements of any qualification
34 required to enter their professional register (Nursing and Midwifery Council, 2018). The advent
35 of the apprenticeship and associated assessment was seen to be over and above their existing
36 requirements and therefore integration of the EPA challenged their regulatory powers and
37 statute.
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45 **Future approaches to end point assessment**

46 It is necessary to consider emerging and future approaches to end point assessment. For
47 professional regulated programmes, the ESFA is implementing a policy of a pseudo-integrated
48 end point assessment (Camden, 2020; Institute for Apprenticeships and Technical Education,
49 2021). For example, for the nursing and nursing associate end point assessment plans, the EPA
50 is changing from examinations or professional discussions to becoming an essential
51 administrative process as part of the training provider's quality assurance and conferment
52 processes (NHS Employers, 2020). This will be self-contained, managed by the higher
53 education institution, and will be much faster to complete than an external end point assessment
54 process (Institute for Apprenticeships and Technical Education, 2021). This model (or at least
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3 a version of it) will be applied to all degree apprenticeships in the future and implications
4 discussed in this paper are likely to be applicable beyond health-related programmes.
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8 The COVID-19 pandemic resulted in derogations from apprenticeship assessment plans with
9 different approaches approved by the Institute for Apprenticeships and Technical Education
10 (IFATE) (Institute for Apprenticeships and Technical Education, 2021). Observation of the
11 apprentice in their working environment forms a key part of the EPA assessment plan for most
12 apprenticeships, although the pandemic brought an understandable halt to this and interruptions
13 to apprenticeships generally (Ventura, 2020). Especially in health and social care
14 environments, visitors were prohibited, meaning that independent direct physical observation
15 became impossible. The EPA for nursing-related apprenticeships had already shifted from
16 direct observation to the use of 'professional discussions' as the accepted EPA in version two
17 of the standard. However, the pandemic meant that for some apprenticeship standards, for
18 example, nursing associate, there was a complete change to the assessment plan, resulting in
19 minimal assessment of apprentices and more of a 'confirmation of completion' approach
20 (Institute for Apprenticeships and Technical Education, 2021). This rightly raised questions
21 about the validity, purpose and requirement for end point assessment. If, during a time of
22 national crisis, a derogation can be implemented which no longer required apprentices to
23 undergo a 'final assessment', what was the purpose of undertaking this in the first place, and
24 why should this be reintroduced?
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38 IFATE has subsequently announced a further change to the end point assessment plan for
39 nursing and nursing associate apprenticeships (Institute for Apprenticeships and Technical
40 Education, 2021), and indicated that this change will be implemented across other end point
41 assessment plans for statutorily regulated qualifications. The revision to the assessment plan
42 for the Nurse Degree Apprenticeship represents a significant change in both approach and
43 content of the assessment, with the requirement for two items of assessment removed and, for
44 the first time, integration of the EPA. The assessment plan requires the training providers
45 themselves to become end point assessment organisations, with the end point assessment only
46 consisting of a confirmatory process at the assessment board (Institute for Apprenticeships and
47 Technical Education, 2021). Training providers must conduct all pre-EPA compliance before
48 completing this step, including holding a gateway meeting. By making these changes, there is
49 an integration of the requirements for registration, completion of the award, and completion of
50 the apprenticeship. This brings recognition of parity between the apprenticeship and the degree
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award, and an apprentice may not register without completing their apprenticeship (as was the case before this change). It also resolves the enduring problem of a paucity of End Point Assessment Organisations in the sector. By asking training providers to become the de facto EPAO for integrated degree apprenticeships, delays to apprenticeship roll out should be removed although training providers need to be aware of the challenges and risks being an EPAO will inevitably bring.

A key element of ensuring an apprentice is ready for award, registration, and completion of the apprenticeship is the practice assessment process. As part of all Nursing and Midwifery Council (NMC) approved pre-registration nursing programmes, learners will complete their mandatory Practice Assessment Document (PAD) throughout their training. All learners must complete this piece of assessment, not just apprentices and this documentation is largely standardised across the United Kingdom (UK). The PAD has been closely mapped to the NMC's Standards for Pre-registration Nursing and is approved by the NMC for all education providers to use. As the nurse degree apprenticeship standard is also mapped to the NMC's requirements, there is a clear line of sight between the requirements of both the regulator and IFATE, with the PAD recognised as a standard measure of student ability to meet the NMC, and thus, apprenticeship requirements. Although the PAD is not the only form of assessment for those undertaking pre-registration training, it is a standard part of all nursing degree qualifications across the UK, and in this respect is unique. Whilst training providers often have free rein to assess the knowledge, skills and behaviours mandated by the apprenticeship standard as they choose, standardisation of the PAD offers assurance that all apprentices will undertake at least one form of assessment which is the same regardless of the training provider. In the new assessment plan, completion of the programme which incorporates the PAD, combined with the process of academic scrutiny and ratification within the Approved Education Institution, increases the level of reliability and reputation of the EPA. The implications of this policy change are far-reaching and may have consequences not just for pre-registration apprenticeships, but for all apprenticeships with a non-integrated end point assessment.

Implications for HE practice

The introduction of apprenticeship end point assessments had a significant impact on Universities and brought about change to both organisational structure and processes to accommodate apprenticeships (Rowe, Perrin and Wall, 2016). End point assessments, because

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3 they are synoptic, may have left HEIs feeling their assessments are undervalued or not trusted
4 (House of Commons, 2018). However, every university's approach to assessment is quality
5 assured as part of the Quality Assurance Agency (QAA) and now Office for Students (OfS)
6 frameworks. Apprenticeships and end point assessments are subject to increased and more
7 complex external quality assurance, and HEIs will need to consider how they approach this.
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13 If HEIs are to undertake their own end point assessments, they will need to consider how they
14 maintain impartiality and independence during the process. This is a requirement of the EPA
15 process and includes management and oversight of the EPA (Education and Skills Funding
16 Agency, 2020). A degree of separation is required between the programme team (i.e. those
17 teaching the programme) and those confirming the requirements are met for the end point
18 assessment (Education and Skills Funding Agency, 2020). In the case of integrated EPAs,
19 separation and impartiality are still required and HEIs may not have enough staff or resources
20 to be able to deliver this element separately. The latest guidance issued to HEIs about the
21 management of integrated EPA for nursing apprenticeships advocates the use of a separate
22 EPA external examiner, which will provide some assurance to ESFA that a degree of separation
23 has at least been attempted. HEIs will also need to consider the resource implications for
24 managing the administration side of EPAs – a plethora of paperwork is required for
25 compliance, and this area may be under-recognised and resourced for apprenticeships in HEIs.
26 Further Education colleges often see EPA as being part of the examinations function, however,
27 this can result in EPA be regarded as a discrete function whereas it should be a holistic part of
28 the apprenticeship.
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42 HEIs are required robust policies and regulations (Quality Assurance Agency, 2018) however
43 these are normally designed for undergraduate and postgraduate degree awards. Separate
44 policies and regulations may be required to ensure HEIs are compliant with ESFA funding
45 rules, and therefore HEIs need to consider apprenticeship- and EPA-specific policies which
46 apply to monitoring and management of apprenticeships/EPAs. There are often contradictions,
47 disagreements, or discrepancies between ESFA rules and HEI regulations requiring individual
48 programme arrangements or derogations. These need to be addressed and articulated in
49 separate (albeit related) policies.
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57 These contradictions extend to the external quality assurance (EQA) of all apprenticeships and
58 end point assessment. The government's announcements that OFSTED will inspect all
59 apprenticeships from April 2021 and quality assurance of EPA will be delivered by OFQUAL
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3 or the Office for Students (Education and Skills Funding Agency, 2020) bring further
4 complications for higher education providers, particularly for apprenticeships requiring
5 regulatory approval. The notion that OFQUAL will assess whether the conduct of the EPA is
6 'fair, comparable and consistent' (IFATE, 2020, P4) simply adds a further layer of inspection
7 to a highly regulated sector. How will this inspection integrate with the role of the external
8 examiner or internal quality processes? In the case of the pre-registration health apprenticeships
9 where the EPA consists of verifying the practice assessment document is adequately
10 completed, the professional regulator will also expect to retain some control over this process.
11 In essence, higher education is about to enter a game of regulatory 'top trumps' but recognising
12 who holds the most power in the game is still to be decided. If all layers of quality inspection
13 are in agreement, then EQA becomes a confirmation of the confirmation, but what if OFQUAL
14 / OfS and the regulatory body disagree?

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25 This new landscape also means different relationships for HEIs with employer partners, the
26 ESFA and IFATE, and apprentices themselves. HEIs will need to carefully consider this
27 shifting landscape and their role within it. The role of independent End Point Assessment
28 Organisations (EPAOs) will be diminished, and there is likely to be greater scrutiny of HEIs
29 because of this. For some EPAOs, there may be existing contractual arrangements that are
30 dissolved because of policy changes, resulting in a reduction of income and possible closure.
31 Ultimately, HEIs can have a positive effect on EPAs, which will result in greater and more
32 timely completion rates – however, because of this, the role these metrics play in assuring
33 quality may diminish. During a period of what has come relatively significant and fast-paced
34 change in apprenticeship policy, keep pace and ensuring continuing compliance becomes
35 challenging for higher education institutions. Some are still relatively new to apprenticeships
36 and understanding the associated nuance of policy and its implications for training providers
37 may unwittingly lead to HEIs being non-compliant.

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49 Finally, because of the changing nature of EPA and bringing this 'in house', the actual cost of
50 performing EPA is likely to reduce. This could support the government's agenda of reducing
51 the cost of apprenticeships by reducing funding bands (Allen-Kinross, 2018; Milton, 2018).
52 Therefore, HEIs are likely to lose funding because of EPA reforms, because the cost to deliver
53 them is reduced. HEIs, however, will still incur costs in setting up a separate, independent,
54 'arm' to deliver EPA, and it is unlikely this will be adequately funded, leaving HEIs to absorb
55 the additional cost. The funding rules make it clear that employers and training providers need
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3 to negotiate the cost of EPA at the beginning of the apprenticeship – will employers seek to
4 reduce the costs associated with EPA because they no longer recognise it as a separate element
5 (Education and Skills Funding Agency, 2020)?
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10 **Implications for clinical practice**

11 Clinical practice requires that professionals who are competent, proficient, and if required for
12 the job, professionally registered (HCPC, 2016; NMC, 2018). Since the mid-1990s, there has
13 been a deliberate and definite move to professionalise health-related programmes and shift
14 them away from delivery by and within the NHS (Price, 2009). This was an important aspect
15 of a wider professionalisation agenda, giving health professionals more autonomy to make and
16 enact decisions about care (Wilkes, Cowin, and Johnson, 2015; Mahaffey, 2002; Orsolini-Hain
17 and Waters, 2009; Francis and Humphreys, 1999; Camaño-Puig, 2005). It coincided with
18 research showing that degree-level study improved the survival of patients (Aiken et al, 2011),
19 resulting in degree-only entry qualification for nurses from the early noughties (The Willis
20 Commission, 2012; Bhardwa, 2013). Allied Health Professions continue the
21 professionalisation journey, with imminent changes to the threshold registration qualifications
22 for operating department practitioners (HCPC Education and Training Committee, 2020) and
23 paramedics (HCPC, 2018) forthcoming. This is a process of evolution, and most healthcare
24 professionals will eventually require degree entry-to-register qualifications. The shift away
25 from NHS-based delivery towards higher education brought about an associated move to
26 continuous assessment and the ‘state final’ examination essentially became consigned to
27 history. Although, there are increasing instances of where NHS organisations work in close
28 partnership with Universities to deliver programmes (Universities UK, 2003), somewhat
29 reversing the divide seen from the mid-1990s onwards between the education and clinical
30 sectors. Arrangements that see increased integration of education and practice do, however,
31 involve complex subcontracting arrangements and regulations (Education and Skills Funding
32 Agency, 2021) which Universities and partnering organisations may seek to avoid.
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49 Richard’s review (2012) suggested that the introduction of End Point Assessment would bring
50 both standardisation and transferability of apprenticeship qualifications, as well as increasing
51 trust in the apprenticeship ‘brand’. However, this issue had been addressed in health-related
52 programmes well before current apprenticeship reforms with the introduction of state
53 registration. The oversight of regulatory and professional bodies also addressed issues of
54 training provider consistency and subsequent qualification transferability. Therefore, EPAs
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3 arguably presented regulated professions and clinical practice with a problem it had already
4 resolved.
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7 Since the inclusion of EPAs in apprenticeships in 2017, there have been delays between the
8 end of a qualification in the traditional sense and the completion of the EPA, in some cases of
9 up to three months. This can be a serious challenge for healthcare organisations who wish to
10 get their staff qualified and working as quickly as possible. Under the assessment plan
11 revisions, this challenge is removed for many but will remain for some roles such as assistant
12 practitioners where there is no regulatory requirement. Health and care organisations often
13 value the qualification or registration more than the apprenticeship itself and thus the
14 apprenticeship risks becoming a funding mechanism for staff development rather than a full
15 vocational journey. The assessment plan changes will be welcomed in clinical practice but the
16 difference between nursing associate and assistant practitioner higher apprenticeships may
17 further widen the gap between these two qualifications which ultimately lead to similar job
18 roles in the NHS.
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29 The current debate about the presence of mandatory qualifications in apprenticeships and the
30 threat this poses to the foundation degree element of the assistant practitioner higher
31 apprenticeship is a further problem and may ultimately signal the demise of this critical role.
32 In a sector where academic credentialing is highly prized, the assistant practitioner role will
33 become devalued and marginalised in favour of the nursing associate, particularly as the latter
34 leads to professional regulation. This in turn will stifle the development of assistant
35 practitioners in the Allied Health Professions and remove vital career development pathways
36 on which the NHS has come to rely. At a time when the NHS is about to launch into the post-
37 COVID recovery phase, systems need to work in harmony and IFATE needs to make
38 concessions around both the mandatory qualification and EPA in the case of the assistant
39 practitioner to provide workforce capacity and stability.
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49 **Implications for government policy**

50 Critics of the Modern Apprenticeship policy of the 1990s focused in part on assessment and
51 quality assurance (Fuller and Unwin, 2003). The changes to EPA, whilst welcomed by many,
52 may herald the first signs of dissatisfaction and mistrust of the current government policy
53 iteration. Amendments to approaches for EPA leading to professional registration or perhaps
54 with other integrated qualifications suggests these may be of superior quality and do not require
55 the final element of assessment conferring standardisation or transferability. The continuing
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3 presence of EPA in other apprenticeships may be perceived as problematic for employers or,
4 at worst, lead them to, once more, have less confidence in the apprenticeship brand. These
5 latest changes essentially introduce a ‘two-tier’ element to apprenticeships – ‘notional’ or ‘full’
6 EPA.
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10 Much was made of the introduction of EPA (Department for Business, Innovation and Skills,
11 2015) although, as this article has discussed, its validity and reliability mean its successful
12 completion is an inadequate proxy for the ability of the apprentice to undertake the role they
13 are seeking to enter. Government policy on apprenticeships has been challenged repeatedly
14 since its introduction, including revision of public sector targets (Whieldon, 2020; Department
15 for Education, 2020) and integration of end point assessment at sub-degree level (Institute for
16 Apprenticeships, 2020). The lack of organisations stepping forward to become EPAOs created
17 a further delay for apprenticeship policy implementation, as no apprenticeship standard could
18 be delivered without an EPAO being identified after October 2019 (IFATE, 2020).
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27 The latest changes suggest that ‘lip service’ is being paid to end point assessment policy either
28 because of inadequate understanding at the time of its introduction or because it is not fit for
29 purpose in some cases. Current and future governments will need to think about these
30 considerations when reviewing and revising apprenticeship policies.
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35 **Implications for ESFA policy**

36 There is no doubt the recent derogations/flexibilities and the changes to assessment plans for
37 professional regulated programmes will impact ESFA policy. By effectively removing the need
38 for external validation or scrutiny of the end point assessment process, the intrinsic value of
39 the award’s integrity returns. This change for professional regulated programmes may
40 eventually be adopted by other apprenticeship assessment plans.
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46 The regulations themselves may require revision in accordance with the changed assessment
47 plans. The revised plans themselves arguably create a third classification of EPA: not integrated
48 (whereby the assessment may be part of a module), or independent (where the assessment is
49 conducted externally), but pseudo-integrated (where apprentices do not undertake any
50 additional assessment, but there is internal-external recognition of completion).
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55 Whilst there is standardisation of the apprenticeship standard and assessment plan, there is still
56 variation in the content of apprenticeships and EPAs. Whilst the nature of the EPA is specified,
57 the actual content of the assessment is left to each EPAO. Parity and equity should be aimed
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3 for rather than standardisation, but there must continue to be some external quality assurance
4 of what training providers and employers are doing as part of the EPA process.
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7 Consequently, the 20% of the funding band which is reserved for end point assessment
8 (Education and Skills Funding Agency, 2020) will inevitably be reviewed, which at a time
9 when funding bands are being reviewed wholesale, brings additional uncertainty for training
10 providers, employers, and the apprenticeship system itself. Simplification of the end point
11 assessment process will inevitably lead to suggestions that an associated reduction in cost is
12 appropriate.
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18 A requirement to confirm completion of the apprenticeship still remains (Education and Skills
19 Funding Agency, 2020), and this should retain an element of independence and objectivity.
20 How will ESFA reassure itself that this is being achieved when training providers have full
21 control over the end point assessment process and what measures will training providers need
22 to put in place to assure ESFA of their compliance? Clear guidance about the roles and
23 expectations of training providers is necessary to ensure they do not unwittingly become non-
24 compliant in their role as EPAOs. The simplification of the EPA content and process must not
25 leave training providers or employers open to criticism about their independence or the quality
26 of the apprenticeship.
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35 **Conclusion**

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37 This article has critically evaluated current and future approaches to end point assessment, as
38 well as considered recent changes to the end point assessment process for nursing (and other
39 professional or statutory regulated professions). It has discussed the implications for HE
40 practice, clinical practice, government policy, and ESFA policy. The changes to the assessment
41 plans for statutory regulated programmes are welcomed as they will restore the integrity of the
42 professional qualification, with training providers and employers heaving a sigh of relief.
43 However, for those EPAOs who stepped into the breach when no other organisation was
44 willing, this is a cruel blow. Significant investment has been squandered and the projected
45 return on that investment has disappeared. Even worse, the pace of implementation has been
46 slowed and apprenticeship completion rates (and income) for some training providers have
47 been low as employers could not see the value of their apprentices completing the EPA,
48 subsequently meaning minimum standards were not met.
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3 Where there is no standardised qualification as part of the apprenticeship, EPA probably is
4 appropriate and will offer the standardisation envisioned by Richard. However, in the
5 healthcare arena, EPA is now not required to the same extent and secondary issues may emerge
6 because only some apprentices achieve professional registration at the end of their
7 apprenticeship. For example, the Assistant Practitioner Higher Apprenticeship does not lead to
8 professional registration, although successful completion of the foundation degree embedded
9 in many of the apprenticeship standards leads to similar outcomes and employment
10 opportunities to that of the Nursing Associate. These two roles will be further divided, no doubt
11 leading to intensified calls for professional recognition of the assistant practitioner role once
12 more.
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21 Trust in the apprenticeship brand is growing; a welcome outcome of apprenticeship reforms,
22 but changes to EPA need to be carefully messaged and implemented to maintain that trust.
23 Where quality, standardisation and transferability are already assured via integrated awards,
24 the government needs to own its mistakes and admit EPA was an unnecessary addition that is
25 now being removed. Ultimately, the inclusion of an EPA in many apprenticeship standards was
26 arguably pointless. The difficulty of completing EPAs has resulted in delayed completion for
27 many apprenticeship standards and created tensions between employers, training providers,
28 and EPAOs. The EPA process is probably suitable and appropriate for some apprenticeship
29 standards - particularly those which are lower level, e.g. hairdressing and others which do not
30 lead to professional registration. However, it is not suitable or appropriate for all - for example,
31 those which lead to professional registration. There needs to be a nuanced, contextualised,
32 right-touch approach to external verification and oversight of apprenticeships including end
33 point assessment, with some external quality assurance of what training providers and
34 employers are doing as part of the EPA process, although not to the extent that there is
35 currently. How this approach may emerge and develop remains to be seen.
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57
58
59
60

References

- Aiken, L.H., Cimiotti, J., Sloane, D.M., Smith, H.L., Flynn, L., and Neff, D. (2011). The effects of nurse staffing and nurse education on patient deaths in hospitals with different nurse work environments. *Medical Care* 49(10): 1047-1053
- Allen-Kinross, P (2018) Major slash in store for apprenticeship funding rate bands. (Online) Available at <https://feweeek.co.uk/2018/09/13/major-slash-in-store-for-apprenticeship-funding-rate-bands/>
- Andersson, I., Wärvik, G. B., & Thång, P. O. (2015). Formation of apprenticeships in the Swedish education system: different stakeholder perspectives. *International journal for research in vocational education and training*, 2(1), 3-24.
- Baker, D (2019) Post-levy apprenticeships in the NHS – early findings *Higher Education, Skills and Work-based learning* Vol 9, No 2 pp189-199
- Benner P 1984 From Novice to expert: Excellence and power in clinical nursing practice. Addison Wesley, Henlo Park, California
- Bhardwa, S (2013) Pre-registration education. Independent Nurse (online) available at <https://www.independentnurse.co.uk/news/pre-registration-education/63119>
- Billett, S (1996) Towards a model of workplace learning: the learning curriculum *Studies in Continuing Education*, 18:1, 43-58, DOI: 10.1080/0158037960180103
- Billett, S (2006) Constituting the workplace curriculum, *Journal of Curriculum Studies*, 38:1, 31-48
- Billett, S. (2016). Apprenticeship as a mode of learning and model of education. *Education+ Training*. Vol. 58 Issue: 6, pp.613-628
- Boud, D. (2000) Sustainable assessment: rethinking assessment for the learning society, *Studies in continuing education*, 22(2), 151-167
- Brockmann, M., Clarke, L and Winch, C (2010) "The Apprenticeship Framework in England: A New Beginning or a Continuing Sham?," *Journal of Education and Work*, 23(16): 23(16): 111-127

1
2
3 Camaño-Puig, R. (2005). Professionalisation of nursing in England and Spain: A comparative
4 study. *Laurea Julkaisut* A56.
5
6

7 Camden, B (2020) End-point assessments could be scrapped for up to 30 apprenticeships.
8 (Online) available at [https://feweek.co.uk/2020/10/15/end-point-assessments-could-be-](https://feweek.co.uk/2020/10/15/end-point-assessments-could-be-scrapped-for-up-to-30-apprenticeships/)
9 [scrapped-for-up-to-30-apprenticeships/](https://feweek.co.uk/2020/10/15/end-point-assessments-could-be-scrapped-for-up-to-30-apprenticeships/)
10
11

12
13 Department for Business, Innovation and Skills (2015) *English Apprenticeships: Our 2020*
14 *Vision*. The Stationary Office, London
15

16
17 Department for Education (2020) Meeting the Public Sector Apprenticeship Target. Online
18 available at
19
20 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/914028/Meeting_the_Public_Sector_Apprenticeship_Target_September_2020.pdf)
21 [/file/914028/Meeting_the_Public_Sector_Apprenticeship_Target_September_2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/914028/Meeting_the_Public_Sector_Apprenticeship_Target_September_2020.pdf)
22
23

24
25 Education and Skills Funding Agency (2020) Apprenticeship funding rules for main
26 providers. (Online) available at
27
28 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956726/2021_Provider_Rules_Version_3_v1.0_FINAL_published.pdf)
29 [/file/956726/2021_Provider_Rules_Version_3_v1.0_FINAL_published.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956726/2021_Provider_Rules_Version_3_v1.0_FINAL_published.pdf)
30
31

32
33 Education and Skills Funding Agency (2020) Information for organisations who are applying
34 to register to offer independent end-point assessment for apprenticeship standards. (Online)
35 available at [https://www.gov.uk/guidance/conditions-for-being-on-the-register-of-end-point-](https://www.gov.uk/guidance/conditions-for-being-on-the-register-of-end-point-assessment-organisations)
36 [assessment-organisations](https://www.gov.uk/guidance/conditions-for-being-on-the-register-of-end-point-assessment-organisations)
37
38

39
40 Education and Skills Funding Agency (2020) Changes to external quality assurance for end
41 point assessment organisations (online) Available at [https://www.gov.uk/guidance/changes-](https://www.gov.uk/guidance/changes-to-external-quality-assurance-for-end-point-assessment-organisations)
42 [to-external-quality-assurance-for-end-point-assessment-organisations](https://www.gov.uk/guidance/changes-to-external-quality-assurance-for-end-point-assessment-organisations)
43
44

45
46 Education and Skills Funding Agency (2021) Subcontracting: using funding to offer
47 education and training. (Online) available at [https://www.gov.uk/guidance/subcontracting-](https://www.gov.uk/guidance/subcontracting-using-funding-to-offer-education-and-training)
48 [using-funding-to-offer-education-and-training](https://www.gov.uk/guidance/subcontracting-using-funding-to-offer-education-and-training)
49
50

51
52 Francis, B., & Humphreys, J. (1999). Enrolled nurses and the professionalisation of nursing:
53 a comparison of nurse education and skill-mix in Australia and the UK. *International journal*
54 *of nursing studies*, 36(2), 127-135.
55
56
57
58
59
60

1
2
3 Fuller, A. & Unwin, L. (2003) Creating a 'Modern Apprenticeship': A critique of the UK's
4 multi-sector, social inclusion approach, *Journal of Education and Work*, 16:1, 5-25, DOI:
5 10.1080/1363908022000032867
6
7

8
9 Gadow, S (1995) Clinical Epistemology: A dialectic of nursing assessment *Canadian Journal*
10 *of Nursing Research* Vol 27, No 2 pp 25-34
11
12

13 Gallagher, P; Smith, T and Ousey, K (2012) Problems with competence assessment as it
14 applies to student nurses *Nurse Education in Practice* Vol 12, Issue 6 P301-303
15
16

17 Gibbs, G and Simpson, C (2005) Conditions Under Which Assessment Supports Students'
18 Learning. *Learning and Teaching in Higher Education* (1). pp. 3-31. ISSN 1742-240X
19
20

21 Hernandez, R (2012) Does continuous assessment in higher education support student
22 learning? *Higher Education* Vol 64 pp 489-502
23
24

25 HCPC (2016) Standards of conduct, performance and ethics. London: HCPC
26
27

28 HCPC (2018) HCPC decision on threshold level of qualification for paramedics (Online)
29 available at [https://www.hcpc-uk.org/news-and-events/news/2018/hcpc-decision-on-](https://www.hcpc-uk.org/news-and-events/news/2018/hcpc-decision-on-threshold-level-of-qualification-for-paramedics/)
30 [threshold-level-of-qualification-for-paramedics/](https://www.hcpc-uk.org/news-and-events/news/2018/hcpc-decision-on-threshold-level-of-qualification-for-paramedics/)
31
32

33 HCPC Education and Training Committee (2020) Update on timeline for public consultation
34 on SET 1 for Operating Department Practitioners (online) available at [https://www.hcpc-](https://www.hcpc-uk.org/globalassets/meetings-attachments3/education-and-training-committee/2020/4.-11.06.2020/enc-03---update-on-timeline-for-public-consultation-on-set-1-for-operating-department-practitioners.pdf)
35 [uk.org/globalassets/meetings-attachments3/education-and-training-committee/2020/4.-](https://www.hcpc-uk.org/globalassets/meetings-attachments3/education-and-training-committee/2020/4.-11.06.2020/enc-03---update-on-timeline-for-public-consultation-on-set-1-for-operating-department-practitioners.pdf)
36 [11.06.2020/enc-03---update-on-timeline-for-public-consultation-on-set-1-for-operating-](https://www.hcpc-uk.org/globalassets/meetings-attachments3/education-and-training-committee/2020/4.-11.06.2020/enc-03---update-on-timeline-for-public-consultation-on-set-1-for-operating-department-practitioners.pdf)
37 [department-practitioners.pdf](https://www.hcpc-uk.org/globalassets/meetings-attachments3/education-and-training-committee/2020/4.-11.06.2020/enc-03---update-on-timeline-for-public-consultation-on-set-1-for-operating-department-practitioners.pdf)
38
39
40
41

42 Hellwig, T (2005), "Apprenticeships in Germany: modernising the Dual System", *Education*
43 *+ Training*, Vol. 47 Iss 4/5 pp. 312 - 324
44
45
46

47 Hordern, J (2015) Higher apprenticeships and the shaping of vocational knowledge, *Research*
48 *in Post-Compulsory Education*, 20:1, 17-34, DOI: 10.1080/13596748.2015.993867
49
50

51 House of Commons (2018) *The apprenticeships ladder of opportunity: quality not quantity*
52 Sixth Report of Session 2017-2019. House of Commons, London
53
54

55 House of Lords (2007) *Apprenticeship: A key route to Skill* Select Committee on Economic
56 Affairs, Fifth Report of Session 2006-07. House of Lords, London
57
58
59
60

1
2
3 Hyland, T. (2014). *Reconstructing Vocational Education and Training for the 21st Century*.
4 *SAGE Open*, 4(1), 215824401352061. doi:10.1177/2158244013520610

6
7 Institute for Apprenticeships and Technical Education (2017) End Point Assessment
8 Available from <https://apprenticeships.blog.gov.uk/2017/08/14/end-point-assessment/> (Last
9 accessed 19.2.21)
10

11
12
13 Institute for Apprenticeships and Technical Education (2020) developing an end-point
14 assessment plan. Online available at: [https://www.instituteforapprenticeships.org/developing-
15 new-apprenticeships/developing-an-end-point-assessment-plan/](https://www.instituteforapprenticeships.org/developing-new-apprenticeships/developing-an-end-point-assessment-plan/)
16
17

18
19 Institute for Apprenticeships and Technical Education (2020) EQA Framework (online)
20 Available at [https://www.instituteforapprenticeships.org/media/4424/eqa-framework-august-
21 2020.pdf](https://www.instituteforapprenticeships.org/media/4424/eqa-framework-august-2020.pdf) (Last Accessed 9.5.21)
22
23

24
25 Institute for Apprenticeships and Technical Education (2021) List of apprenticeships with
26 temporary discretions or flexibilities (online) available at
27 [https://www.instituteforapprenticeships.org/covid-19/recent-announcements/list-of-standards-
28 with-temporary-discretions-or-flexibilities/](https://www.instituteforapprenticeships.org/covid-19/recent-announcements/list-of-standards-with-temporary-discretions-or-flexibilities/)
29
30

31
32 Institute for Apprenticeships and Technical Education (2021) Nursing Associate (NMC 2018)
33 apprenticeship standard (online) available at
34 [https://www.instituteforapprenticeships.org/apprenticeship-standards/nursing-associate-\(nmc-
35 2018\)-v1-1](https://www.instituteforapprenticeships.org/apprenticeship-standards/nursing-associate-(nmc-2018)-v1-1)
36
37
38

39
40 Jørgensen, C. H. (2017). From apprenticeships to higher vocational education in Denmark—
41 building bridges while the gap is widening. *Journal of Vocational Education & Training*,
42 69(1), 64-80.
43
44

45
46 Kroepe, P (1988) The Epistemology of Assessment, *Educational Psychology*, 8:4, 281-289,
47 DOI: 10.1080/0144341880080408
48

49
50 Lave, J. & Wenger, E. (1991) *Situated Learning* Cambridge, Cambridge University Press.
51

52
53 Lester, S (2020) Creating conditions for sustainable degree apprenticeships in England
54 *Higher Education, Skills and Work-based Learning* Vol 10, No 5 pp701-714
55

56
57 Mahaffey, E. H. (2002). The relevance of associate degree nursing education: Past, present,
58 future. *Online Journal of Issues in Nursing*, 7(2), 11.
59
60

1
2
3 Miller C.M.I. & Parlett, M. (1974) *Up to the Mark: a study of the examination game*,
4 Guildford: Society for Research into Higher Education

5
6
7 Milton, A (2018) Our new approach to funding apprenticeships will provide better value for
8 money (online) available at [https://feweeek.co.uk/2018/09/13/our-new-approach-to-funding-](https://feweeek.co.uk/2018/09/13/our-new-approach-to-funding-apprenticeships-will-provide-better-value-for-money/)
9 [apprenticeships-will-provide-better-value-for-money/](https://feweeek.co.uk/2018/09/13/our-new-approach-to-funding-apprenticeships-will-provide-better-value-for-money/)
10
11

12
13 NHS Employers (2020) Update on end point assessments for nursing workforce
14 apprenticeships (online) available at [https://www.nhsemployers.org/news/2020/04/update-on-](https://www.nhsemployers.org/news/2020/04/update-on-end-point-assessments-for-nursing-workforce-apprenticeships)
15 [end-point-assessments-for-nursing-workforce-apprenticeships](https://www.nhsemployers.org/news/2020/04/update-on-end-point-assessments-for-nursing-workforce-apprenticeships)
16
17

18
19 NMC (2018) *The Code*. London: NMC

20
21 Nursing and Midwifery Council (2018) Part 3: Standards for pre-registration nursing
22 programmes. London: NMC

23
24 Orsolini-Hain, L., & Waters, V. (2009). Education evolution: A historical perspective of
25 associate degree nursing. *Journal of Nursing Education*, 48(5), 266-271.
26
27

28
29 Pearson (2021) End Point Assessment available from
30 [https://www.pearson.com/uk/web/pearson/our-training-services/apprenticeships/end-point-](https://www.pearson.com/uk/web/pearson/our-training-services/apprenticeships/end-point-assessment.html#:~:text=At%20the%20end%20of%20an,their%20knowledge%20and%20practical%20capabilities.)
31 [assessment.html#:~:text=At%20the%20end%20of%20an,their%20knowledge%20and%20pr](https://www.pearson.com/uk/web/pearson/our-training-services/apprenticeships/end-point-assessment.html#:~:text=At%20the%20end%20of%20an,their%20knowledge%20and%20practical%20capabilities.)
32 [actical%20capabilities.](https://www.pearson.com/uk/web/pearson/our-training-services/apprenticeships/end-point-assessment.html#:~:text=At%20the%20end%20of%20an,their%20knowledge%20and%20practical%20capabilities.) (Last accessed 6.3.21)
33
34
35

36
37 Pilz, M. (2007). Two countries—one system of vocational education? A comparison of the
38 apprenticeship reform in the commercial sector in Switzerland and Germany. *Journal of*
39 *Comparative and International Education*, 37(1), 69-87.
40
41

42
43 Price, R (2009) *Diploma to Degree 1976 to 1993 Radiography* Vol 15 e67-e71

44
45 Quality Assurance Agency (2018) *UK Quality Code for Higher Education. Part A: Setting*
46 *and Maintaining Academic Standards*. Gloucester: QAA

47
48 Quality Assurance Agency (2021) Our work Available from [https://www.qaa.ac.uk/about-](https://www.qaa.ac.uk/about-us/what-we-do/our-work)
49 [us/what-we-do/our-work](https://www.qaa.ac.uk/about-us/what-we-do/our-work) Last accessed 6.3.21
50
51

52
53 Ramsden P (2003) *Learning to Teach in Higher Education*, second edition, London:
54 RoutledgeFalmer

55
56 Richard, D. (2012), *The Richard Review of Apprenticeships*, School for Startups, London.
57
58
59
60

1
2
3 Rowe, L; Perrin, D and Wall, T (2016) "The Chartered Manager Degree Apprenticeship:
4 trials and tribulations", *Higher Education, Skills and Work-Based Learning*, Vol. 6 Issue: 4,
5 pp.357-369
6
7

8
9 Steedman, H (2001) Five years of the modern apprenticeship initiative: an assessment against
10 continental European models. *National Institute Economic Review*, October 2001, No. 178
11 (October 2001), pp. 75-87
12
13

14
15 The Willis Commission (2012) Quality with compassion: the future of nursing education.
16 Report of the Willis Commission on Nursing Education. London: RCN
17

18
19 Universities UK (2003) Partners in Care: Universities and the NHS. London: Universities
20 UK. Available at [https://www.universitiesuk.ac.uk/policy-and-](https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2005/partners-in-care-universities-and-nhs.pdf)
21 [analysis/reports/Documents/2005/partners-in-care-universities-and-nhs.pdf](https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2005/partners-in-care-universities-and-nhs.pdf)
22
23

24
25 Unwin, L (2017) The role of qualifications and end point assessment in apprenticeships: an
26 international comparison. Semta. Watford, England available from
27 <https://www.voced.edu.au/content/ngv%3A76728> last accessed 28.3.21
28
29

30
31 Ventura, G. (2020). What future for apprenticeships after coronavirus? Centre for Vocational
32 Education Research CVERBRF012
33

34
35 Wilkes, L., Cowin, L., & Johnson, M. (2015). The reasons students choose to undertake a
36 nursing degree. *Collegian*, 22(3), 259-265.
37

38
39 Whieldon, F. (2020) MATs miss apprenticeship targets requirement, but DfE softens stance.
40 Schools Week (online) available at [https://schoolsweek.co.uk/mats-miss-apprenticeship-](https://schoolsweek.co.uk/mats-miss-apprenticeship-targets-requirement-but-dfe-softens-stance/)
41 [targets-requirement-but-dfe-softens-stance/](https://schoolsweek.co.uk/mats-miss-apprenticeship-targets-requirement-but-dfe-softens-stance/)
42
43

44
45 Wolf, A (2011) Wolf Report – review of vocational education. London, England: Department
46 for Education
47

48
49 Yorke, M (2003) Formative assessment in higher education: Moves towards theory and the
50 enhancement of pedagogic practice *Higher Education* Vol 45 pp 477-501
51
52
53
54
55
56
57
58
59
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Response to reviewer comments

We would like to thank the reviewers for their comments, which have helped ensure that the paper is as robust as possible. Please see our response to individual comments in the table below.

Reviewer one	Written response	Page/document reference
<p>The paper draws on a wide variety of sources of literature, from both academic papers and key policy documentation. It clearly evaluates the evolution of the EPA, using appropriate sources and considers the wider educational context of assessment and EPA.</p> <p>However, I think that the role of EPA also verifies competence- not just certifying learning (p6) and this should at least be discussed.</p> <p>The Covid derogations have undoubtedly influenced the evolution of the EPA process for the NMC registered programmes and this is very well articulated, with well reasoned arguments for maintaining the status quo.</p>	<p>We have added in some information about competency and the role that EPA might (or might not) play in assuring competence.</p>	<p>P5-6</p>
<p>The analysis of the key themes within the paper leads well into the implications for various stakeholders and the conclusion.</p> <p>the only omission from my perspective is the potential threat of the removal (in accordance with ESFA policy) of the FD from the AP standard, which will further broaden the gap between the perceptions of the NA and AP qualifications.</p>	<p>Thank you – we feel very strongly about this ourselves and think that this addition strengthens the paper further.</p>	<p>End of ‘Implications for Clinical Practice’ section</p>
<p>The paper is well structured around the question posed in the title and investigates this from a variety of dimensions. As this is an opinion piece this is entirely appropriate.</p>	<p>Thank you.</p>	
<p>The analysis of the key themes within the paper leads well into the implications for various stakeholders and the conclusion.</p> <p>the only omission from my perspective is the potential threat of the removal (in accordance with ESFA policy) of the FD from the AP standard, which will further broaden the gap between the perceptions of the NA and AP qualifications.</p>	<p>We have addressed this – please see the section above.</p>	
Reviewer Two		
<p>Yes. I do, however, feel several issues need consideration. I was surprised no reference is made to External Quality Assurance of EPA and the IfATE movement to have EPA conducted by Ofqual (all Apps apart from integrated DAs) or OfS/QAA for integrated DA or in a very limited number of areas</p>	<p>We have tried to pose relevant questions or raise the relevant points requiring consideration.</p>	<p>See ‘Implications for HE practice’.</p>

<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16</p> <p>a PSRB. What does this change mean for nursing/healthcare EPA and EPA overall? IfATE is also moving from a position of opposing the inclusion of a degree/qualification in an Apprenticeship (reference the mandatory qualification rule) to valuing their inclusion. See the forthcoming consultation on DA (widely trailed) and due in May. This does/will contain much on EPA and reflects some points made.</p>	<p>We have mentioned the removal of mandatory qualifications from some apprenticeships in the context of the assistant practitioner / HA. At the time of responding, we still await the publication of the consultation, but have attempted to include what we *think* will be proposed, as some of this information is still emerging.</p>	
<p>17 18 19 20 21</p> <p>The paper is sound - but arguably needs inclusion of this issues identified under 2. A double check on how issues raised relate to the ESFA Funding Rules would be useful.</p>	<p>We have reviewed how these contributions relate to the funding rules, and we have strengthened reference to these throughout the text.</p>	
<p>22 23 24 25 26 27 28 29 30 31 32 33</p> <p>Yes - although I think sometimes the arguments presented and based on experience in the health sector are over applied to other sectors? In the past a key argument was that Apprenticeships were assessment driven rather than training driven. By the end of the Apprenticeship, although continually assessed the individual was not occupationally competent hence the current focus on Apprenticeship being training driven and EPA confirming occupational occupational competence. This remains a key driver for the programme. Overall I think policy makers would be most concerned over the lack of EPAOs and limited capacity and ability to respond to employer/apprentice demand for EPAO. I think we need to be careful about assuming the experience of one sector represents the overall experience of all sectors.</p>	<p>We have added a comment which addresses this to the 'Future approaches...' section and 'Implications for Government Policy' section</p>	
<p>34 35 36</p> <p>.: Very well written. I do, however, the author needs to define very clearly what EPA, an EPAO and EQA is at the start.</p>	<p>We have inserted these definitions.</p>	
<p>37 38 39 40 41 42 43 44 45 46</p> <p>EPA is a key feature of English Apprenticeship policy and programmes. Sometimes the article positions developments as UK policy e.g. the Richard review. The English focus of the research and review needs to be very clear.</p>	<p>Thank you – we have addressed this error.</p>	

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