

Education and Training Committee, 7 March 2019

Reviewing our approach to quality assuring Higher and Degree Apprenticeships

Executive summary

This report considers the HCPC approach to quality assuring new Higher and Degree Apprenticeships against our education standards. It outlines:

- the background to understanding apprenticeships including the stages of creating an apprenticeship;
- what our approach to these assessments was;
- the outcomes from approval and major change assessments, including identifying key trends; and
- our approach to this work in the future.

Decision

The Committee is requested to discuss the report. No decision is required.

Resource implications

None

Financial implications

None

Date of paper

22 February 2019

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Reviewing our approach to quality assuring Higher and Degree Apprenticeships

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Section 1: Executive summary and introduction

This report considers the HCPC approach to quality assuring new Higher and Degree Apprenticeships programmes against our education standards. It outlines:

- the background to understanding apprenticeships including the stages of creating an apprenticeship;
- · what our approach to these assessments was;
- the outcomes from approval and major change assessments, including identifying key trends; and
- our approach to this work in the future.

Apprenticeships combine paid work and part-time study to offer individuals the opportunity to gain degree while partaking in work based learning. The scheme requires employers in England with a large enough wage bill to pay an 'apprenticeship levy', which they can then access to run apprenticeship training.

Organisations that employ many of the HCPC's 16 professions (such as NHS Trusts and Local Authorities) must pay this levy. Therefore, we have seen much interest in setting up apprenticeship programmes, and many proposals for new apprenticeship programmes intended to train future professionals.

Section 2: Setting up an apprenticeship programme for an HCPC profession

The Institute for Apprenticeships (IfA) was established to regulate all apprenticeship qualifications in England. This organisation oversees the development and approval of apprenticeship standards (on an occupation level), the approval of Registered Training Organisations that may deliver apprenticeship training, and the approval of End Point Assessors. Before an apprentice can commence their training, two broad stages must be completed with the IfA.

Development phase

An apprenticeship standard and assessment schedule is developed, consulted on and approved by the IfA during this phase. Trailblazer groups are formed for each occupation (profession) with representatives from a wide range of employers, education providers, professional bodies and the IfA.

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There are three key parts to the development stage:

Proposal approved – the IfA has decided that the proposal meets its occupation requirements criteria, and that an apprenticeship standard can be developed by the Trailblazer group.

Standard approved – the IfA has approved the apprenticeship standard against their requirements.

Assessment plan approved – the IfA has approved the assessment plan (or End Point Assessment) against their requirements.

In the development phase, the 'funding band' is also allocated. This is the funding used to pay for apprenticeship training and assessment for apprentices.

The IfA requires that all apprentices take an independent assessment at the end of their training to confirm that they have achieved occupational competence. This assessment is called the End Point Assessment (EPA), and may or may not be integrated into the training. Trailblazer groups must make the choice about whether to integrate this into the training, which may significantly impact on the design and delivery of the curriculum and assessment of the programme.

The HCPC has no view on whether Trailblazers decide to integrate the EPA into the training, or delivered as a separate assessment which is undertaken in order to complete the apprenticeship. The HCPC rather assesses and approves the programme award. As there is a proportion of funding associated with the apprentice completing the EPA, most Trailblazer groups have opted to contain the EPA within the programme award.

In this phase, the HCPC provides a consultative role to the Trailblazer group while not formally sitting on them, and provides a letter of support to the final apprenticeship standard when we are satisfied it aligns to the relevant standards of proficiency (SOPs). From a practical perspective, we have provided advice and guidance about our regulatory requirements to Trailblazer groups, including how achievable intended timeframes are.

Implementation phase

Individual training providers and assessors apply to the IfA to be approved to deliver training which meets the apprenticeship standard. Once approved, employers can procure education providers to provide apprenticeship training and start apprentices. During this phase, we carry out approvals for new programmes, and look at significant changes to existing programmes that are incorporating an apprenticeship route.

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Informing education providers of our requirements

To ensure education providers were clear about our regulatory requirements, and to ensure they were able to work in regulatory approval into developing proposals, we provided information explaining our approach, and how to interact with the HCPC related to new apprenticeship provision. We created a <u>page on our website</u> relating to this area, and regularly updated providers on our approach via our Education Update newsletter, which is sent to around 1600 recipients.

Section 3: Our broad approach to assessment

Our standards of education and training (SETs) are designed to be flexible, which means they can be applied to a variety of training models. As with other programmes, when setting up an apprenticeship programme, education providers needed to demonstrate how the programme met our standards.

New programmes

Generally, if education providers introduced a new programme award title to deliver an apprenticeship programme, we considered this a new programme. This would usually be the case even where the provider was already approved to deliver training at the same level for the profession using a different programme award title.

In line with our normal requirements, we considered these programmes via the approval process, including an approval visit, and we needed to approve them before apprentices could start their training. For these programmes, normal timescales applied of a six month lead-in, with an aim to conclude the process within three months of the visit.

Changes to existing programmes

Some education providers intended to make changes to their existing programme to deliver an apprenticeship pathway through the programme. We were able to assess these changes either prospectively or retrospectively in accordance with our normal major change process.

In these cases, we may have still needed to conduct a visit if we considered this was the most proportionate way to assess changes to incorporate an apprenticeship route. A potential result of this process was that we did not approve changes, and required providers to run the programme as it currently met our standards.

We may have also required providers to introduce a new study mode for the apprenticeship for the purposes of our records (eg work-based learning).

Progress against the Institute for Apprenticeships' requirements

We aimed to progress our assessment in the most timely and efficient way that we could, to support providers in delivering apprenticeship training. Through our processes, we asked providers to consider how much detail they could provide at the point of engaging with us around their new apprenticeship training. We expected that providers were able to tell us how the introduction of the apprenticeship programme would affect

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programme design and delivery to allow us to consider the programme against our standards.

Therefore, when engaging with our processes we asked providers to consider the profession's progress against the IfA's requirements. For example, it may have been difficult (although not impossible) for programmes to demonstrate how they are sustainable and fit for purpose (a requirement of our standards) if the funding band had not be agreed.

Standards that may be affected

In preparing education providers to engage with our processes, we noted that several of our standards may be affected depending on the model of apprenticeship training proposed.

Admissions (SET 2), especially those around professional entry, accreditation or prior (experiential) learning, and equality and diversity, may be impacted by changes to admissions for widened access to the programme.

Programme governance, management and leadership (SET 3), and **practice-based learning** (SET 5) may be impacted due to the changing relationship between the employer and the education provider and the higher proportion of learning carried out in a work based setting.

Assessment (SET 6) was likely to be impacted if the End Point Assessment (EPA) is embedded within the programme.

Programme design and delivery (SET 4), assessment (SET 6), programme governance, management and leadership (SET 3), and practice-based learning (SET 5) may be impacted by changes to the structure of the programme, teaching and assessment methods.

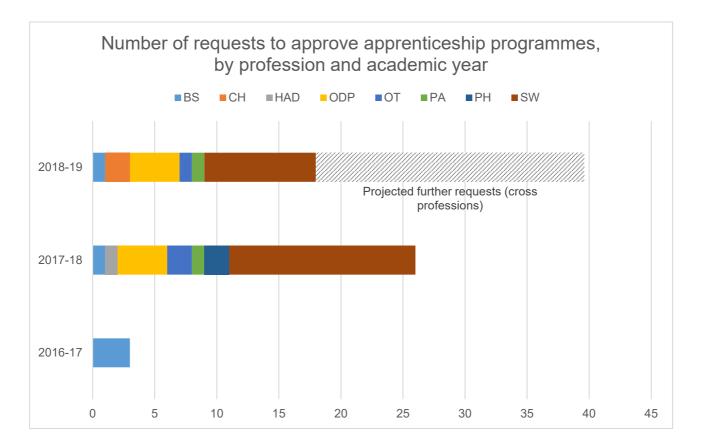
Section 4: External driver for change

The work undertaken to develop apprenticeship programmes is led by the professions, and therefore the driver for change, and associated work required to be undertaken by the HCPC is not directly within HCPC control. When planning upcoming work, we consider initiatives such as this, and attempt to estimate the associated work for the Department to ensure we are adequately resourced to undertake this work.

Professions developed their standard with the IfA independently of one another, and therefore there have been spikes of engagement from particular professions over the last two academic years.

Early requests to approve apprenticeship programmes came from biomedical scientist programmes, but these requests have now broadened out to other professions as noted in the chart below.

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The figure from 2018-19 has been projected using requests up to and including January 2019, and is meant to be indicative of the potential increase in activity for the Education Department, linked to the apprenticeship scheme.

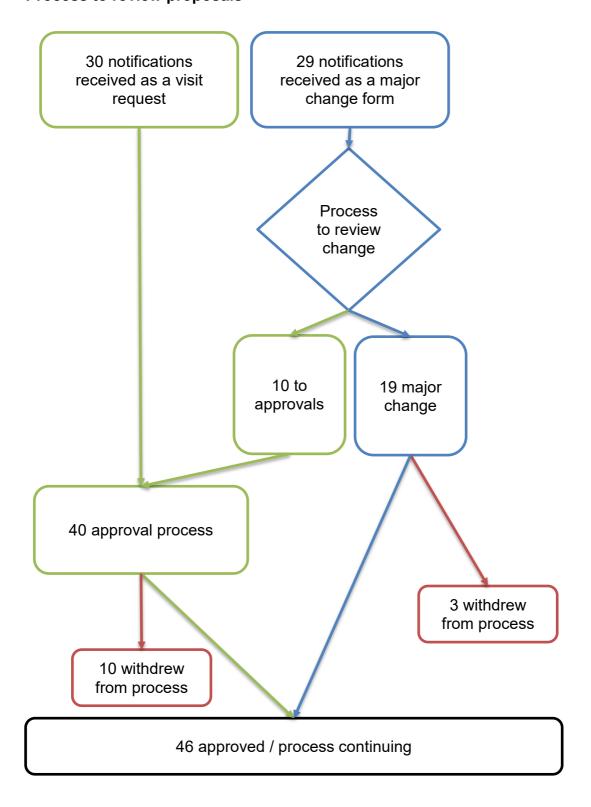
Section 5: Operational application of our approach to assessing changes

Generally, education providers requesting approval for apprenticeship programmes already ran provision within the profession.

We received almost equal requests to approve apprenticeship programmes through the approval and major change process. Around a third of major changes went to the approval process after their initial assessment by the Executive. This has resulted in the majority (around two thirds) of programmes being considered by the approval process. Not all of these processes have yet concluded.

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Process to review proposals



Notifications received via the major change process

In this process education providers provide a change notification form, which details the change along with how they consider that it will impact on our standards being met by the programme(s). A member of the Executive team then make a decision about how to assess that change, by one of the operational processes (annual monitoring, approvals, or the full major change process).

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We put in place general expectations of how to assess major change notifications, against the principles defined in section 3.

For Executives, we created the following general principles to consider when assessing change notification forms. This guidance has been useful to understand which process we should use to assess an apprenticeship programme whilst ensuring that we are making consistent decisions across all programmes.

The programme is assessed through our approval process if:

The education provider is introducing a new award

The education provider is proposing changes to a programme and not creating a new award, and

Introducing a new mode of study using

We considered these as reasonable principles, as if providers considered apprenticeship programmes needed a new award title, along with all that would require from a development, validation and quality assurance perspective internally, the programme was unlikely to fit simply within existing provision. In these cases, the approval process would allow the changes to be scrutinised through a documentary submission and discussed in more detail with relevant stakeholders.

the exact same programme name

Following early assessments of apprenticeship proposals, we developed standard wording for our decisions which noted the areas where we considered there may be impact on our standards, with our understanding of normal apprenticeship provision. This wording was used as appropriate by Executives, and was amended depending on the detail provided by the education provider.

To set the visitors up to assess these proposals via documentary means, we also required further specific information from providers when engaging through the full major change process, including:

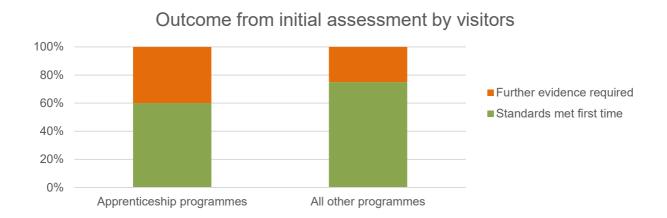
- a major change SETs mapping document, which:
 - considers the impacts to all of the standards of education and training (SETs); and
 - o provides a rationale to support where current arrangements used for the existing approved programme are deemed to be appropriate.
- a SOPs mapping document detailing how the knowledge, skills and experience required by these standards are met through learning and assessment on the new route (and any changes made in comparison to the currently approved programme);
- evidence that supports the education provider's approach to addressing:

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- How the education provider will secure apprenticeship funding from employers as a Registered Training Organisation approved to deliver training in accordance with the relevant apprenticeship standard.
- How the programme will be designed to appropriately support apprentice learning, and how this may differ to the current provision.
- How the education provider plans to support practice-based learning where apprentices will be both employees and learners.
- How the assessment design and strategy ensures those that complete the programme meet the standards of proficiency (SOPs) for the profession, including how the EPA is integrated (if applicable).
- the maximum learner cohort size for the new route and any overall resource impact alongside the delivery of the existing approved programme.

We asked that providers gave us a self-contained submission, which could be considered by our visitors who have no prior knowledge of the existing approved programme, and have not been involved with the discussions about how to assess the new route.

Programmes assessed through the full major change process



Considering that these assessments were of proposals that were different from existing provision in at least some fundamental ways, it is not surprising that we saw more issues with apprenticeship programmes meeting the standards at the first time of asking. We have analysed areas where we needed further evidence in section 6.

The process allowed for a good quality of assessment to be undertaken by our partner visitors via documentary means. This was in part due to the more specific requirements of the documentary submission from the education provider, in addressing how the programme meets the standards. Through this review, it is clear that the major change process was an effective method of reviewing these proposals.

The major change process allowed for education providers to start their apprenticeship programmes more quickly, as we allowed learners to commence before we had made assessments (with the education provider running the risk that we may not approved these programmes).

Major change assessments are also a less burdensome way of assessing programmes, as costs such as accommodation and travel are not incurred for members of the Executive or partner visitors, the visitor fee is lower for these assessments, and the

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education provider can engage with the process remotely through the provision of documentation.

Programmes assessed via the approval process

Generally speaking, if an education provider asked us to visit an apprenticeship programme, we arranged a visit to consider that programme. This was the case even if the provider ran an existing programme within that profession. We considered that only those providers who considered their apprenticeship provision to be significantly different to any existing provision would request an approval visit, rather than engage with the major change route. This was consistent with the advice we gave to education providers in our communication activities relating to this initiative.

In three cases, providers asked us to visit their apprenticeship route, but from the information provided it seemed we could consider them via the major change process (if, for example, the provider was not making changes to the programme award). In these cases, we had conversations with providers to try to understand their provision, and asked them to engage with the major change process instead of the full approval process. This seemed a proportionate approach to assessing these programmes, when providers had misunderstood our requirements.

On average, we set 11 conditions on apprenticeship programmes, compared to an average of 9 for all other programmes in the last academic year. Although there were more issues for apprenticeship programmes on average, this figure does not suggest any fundamental issue with these programmes in meeting our standards. We have analysed areas that needed further work in section 6.

Cancellation of approval assessments

One third of apprenticeship approval cases were cancelled before the approval visit. The majority of cancelled cases were for social work apprenticeship programmes. In seven cases, education providers decided to withdraw from the process due to delays with the funding band being agreed, and the EPA being finalised. Although we do not require these areas to be finalised before we visit, education providers decided that they could not be ready for visits without certainty in these areas.

The HCPC are not in control of education providers cancelling approval visits, but we can be aware of situations where this is more likely to occur, like in the cases above. When significant areas of apprenticeships have not been finalised, like the funding band or EPA, we should ensure we work closely with providers around the readiness of their proposals, so we do not commit resources unnecessarily.

We cancelled one visit as we were able to review a proposal which was initially due to be assessed through an approval visit through the major change process. This was due to the proposal being significantly changed to bring it more in line with an existing approved programme, and to meet the normal expectations as noted through the notification stage of the major change process.

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Section 6: Findings from assessments of programmes

We have drawn together issues found via the approval and major change processes into four key themes that link to the normal apprenticeship model. The following four areas do not cover all issues identified for apprenticeship proposals, but other issues identified were not specifically linked to the apprenticeship model.

Partnership arrangements

Partnership arrangements between education providers and employers often worked in a very different way to more traditional undergraduate programmes. This was due to the way apprenticeship programmes were set up via the Trailblazer groups, with heavy influence from employers, and because of the flow of funding. The employer (who procures training, supplies learners, and provides most (if not all) practice-based learning opportunities) became the education provider's 'customer' in the majority of cases. This shifted the balance of the relationship between groups that had often worked together in education and training of future professionals.

We expect education providers to be clear about how their partnership arrangements work, in operational areas such as admissions, and securing placement capacity, to a more strategic level around sustainability, ownership and development of the provision, and intended deliverables of the programme.

Education providers intended to manage changing partnership arrangements in one of two ways. Some providers came from a proactive approach of setting up specific programme committees or groups, with joint membership from key partner employers and the education provider. These groups were intended to provide governance oversight for the apprenticeship programme, define operational roles and responsibilities, and feed into the internal quality assurance of the programme. At the point of assessment, some of these groups were functional to manage the programme, but for others they were not.

Other education providers either decided or assumed they would be able to continue with their existing arrangements, and apply them to their work with partner institutions for apprenticeship programme. This approach worked well for some programmes (for example social work programmes delivered within a Teaching Partnership¹). For these programmes, partnership arrangements were already clearly defined, and many apprenticeship programmes were able to easily slot into these existing arrangements.

When visitors reviewed the detail of how education providers intended to set up or change their partnership arrangements, considering the context of the apprenticeship scheme, issues they found focused around:

- strategic positioning of the groups involved in partnership arrangements, including ownership of the training;
- formal commitment from employers to supply apprentices (and therefore funding) to the programme;

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¹ The Social Work Teaching Partnerships scheme was set up "to improve the quality of education received by social work students." Within this was the driver to "enhance partnership arrangements between Higher Education Institutions (HEIs) and employers". (Social work teaching partnership programme pilots: evaluation – Final research report (May 2016), page 14)

- how operational responsibilities for elements of the programme (for example admissions decisions, allocation of practice experience) would work; and
- how the provider would effectively quality assure practice-based learning at the institution that was supplying the learners and funding.

Sometimes it was challenging for provider to meet our expectations in these areas, as procurers often needed to see that programmes were on the path to regulatory approval as part of their requirements, before procurement decisions had been made. This was especially challenging when there was existing provision run by more than one provider in a region, but only limited need for apprentices places. In these cases, multiple programme may have been competing for a limited number of apprentice learners.

Not knowing who partners would be would also have broader implications for providers, as without winning tenders, programmes would likely not be able to run, meaning we could not be satisfied that programmes were sustainable.

Through approval and major change assessments, education providers were at various stages of programme development which impacted on their ability to address some of these challenges. Without knowing who partners would be, education providers struggled to show us how partnership arrangements would work. For more traditional programme models, this may not have been such an issue, as providers could have been more prescriptive with their requirements of partners. For apprenticeship programmes, the employer is a key strategic player, and with the way funding works, could even be seen more as a 'customer'. Therefore, we found education providers and employers worked more in partnership from earlier stages of programme development, and employers held more influence over programme design and delivery, depending on what they needed from their apprentices. Sometimes, this might have led to education providers and employers expecting different things from programme delivery, but when undertaking regulatory reviews strategic partners had generally worked through preferred approaches and presented a united front.

Through these assessments, education providers were able to satisfy our visitors that their partnership arrangements were reasonable to meet our standards. Often, providers put in place draft agreements focusing on the areas flagged in this section, subject to winning tenders and regulatory approval. We were satisfied with this approach, with the expectation that if something significant changes, this would fundamentally alter the proposal and therefore providers would need to engage with the regulator once more.

Programme resources

All but five apprenticeship programmes (54 proposals in total) were proposed by providers with existing provision within the profession. Most of the time, education providers intended to directly integrate their proposed apprenticeship programme within their existing provision, meaning that apprentice learners would share learning resources, and academic and administrative staff with existing more traditional learners. In these cases, they might also broadly undertake the same modules, sometimes alongside more traditional learners, and sometimes at different times within the academic year. For these providers there were benefits and challenges of integrating this different set of learners into their existing provision.

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When we assessed new apprenticeship programmes, we needed to consider whether resources were appropriate to the programme and its model of delivery. However, when a provider was running an existing programme in the profession and had resources in place, we could take confidence that these resources were tried and tested, and appropriate to the delivery of an existing programme, even if that programme was run in a different way to the proposed apprenticeship programme.

Sometimes, however, this led to assumptions from education providers that the resources would be appropriate to the delivery of the apprenticeship programme, specifically how programme resources, including staffing, would be used to support learners through the programme. Often, these issues focused on how resources would be used effectively for a set of learners with potentially different needs, and how resources would be shared with existing provision.

For example, many apprentice learners spent more time in the workplace than more traditional undergraduate learners, meaning they needed to be supported to be more independent in their learning. Some of these learners were returning to training after many years, with some having more recently achieved Further Education qualifications and decided to take an employment route into the profession. So there was often also a range of support needed, depending on the learner.

As apprentice learners were often situated in their workplace for the majority of their training, they may have considered this institution their 'home' institution (as opposed to the education provider). In these cases, it may have been more difficult for them to remotely access support from the provider, or to be unclear where to access support from. These were areas that visitors investigated through assessments of programmes, and we had further requirements of providers in several key areas relating to the above.

When introducing an apprenticeship programme, most providers chose to increase their learner numbers overall, but some reduced learners on existing programmes so their overall numbers remained the same. Decisions about overall cohort size linked to two factors. Firstly, what the education provider thought they could reasonably resource, with their existing or further resources. Secondly, what employers wanted, and what they could resource in terms of practice-based learning. Employers are key partners in apprenticeship programmes, and are responsible for providing practice-based learning experience for learners, and resources to support learning in practice. This meant that practice-based learning was often well resourced.

Generally, visitors were happy with arrangements to increase learner numbers, and there was no emerging theme in our requirements of programmes that was linked specifically to increasing learner numbers for apprenticeship programmes. These requirements of programmes through assessments could have been made of any other provider that was increasing learner numbers, or introducing a new route.

Even with increases in learner numbers, having existing resources (such as specialist teaching equipment, or books in the library) in place, was beneficial to meeting our standards linked to resourcing the programme. In meeting our regulatory requirements, education providers were able to adapt their existing resources, and introduce specific resources for apprenticeship learners where required. For example, often education providers would ensure that they had good e-book stocks for apprentice learners to access while they were away from the education provider, and that learners were able to access libraries from other local education providers. Where attendance on site at the

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education provider was necessary (to undertake academic components of the training, and to access specialist teaching equipment), this requirement was usually made clear to apprentice learners so they knew what was expected of them. Importantly, employers were also usually clear that apprentice learners were undertaking training, and that the academic components of this training were crucial to the qualification of their apprentices.

Model of delivery

In order to meet IfA requirements, apprentices must undertake at least 20 per cent 'off-the-job' training. Usually, for apprenticeship programmes we have approved, we saw learners undertaking a certain proportion of their week at their place of work, and the rest at the education provider. Structurally, this is different to many traditional undergraduate programme which often operate a model of alternating blocks in the academic and placement setting, often lasting weeks or months at a time.

In practice, this meant that apprentices often undertook:

- academic components at the education provider and via distance learning;
- formal 'placement' components (which were linked to learning outcomes) at their employer or elsewhere; and
- paid duties at their employer.

The latter of these three strands provides the biggest difference to more traditional undergraduate training models. Apprentices would undertake work which may involve shadowing professionals early in the programme, but would normally move to undertaking work of their own, possibly in an assistant capacity (depending on the profession), with a greater level of autonomy as they progressed through the programme. Through their training, apprentices need to be supported to contextualise this work within their training to become a professional. Through all of this, education providers needed to ensure that that apprentices' experience in their place of work (and elsewhere if formal 'placements' took place at another employer), was appropriate to support the achievement of the learning outcomes.

Although this training model is not a barrier in itself, it did provide education providers challenges with delivering programmes alongside existing provision, effectively integrating theory and practice, and supporting learners (discussed in the sub-section above). It required education providers to think differently about delivering academic components of the programme at the same time as learners undertake practice-based learning. From a timetabling perspective, there were challenges if learners from different programmes were undertaking the same modules together, as apprenticeship learners would have only been in the academic setting at certain times.

Sometimes, providers decided to run the same modules twice aimed at the different learners, sometimes providers were able to timetable all learners to undertake learning together, and sometimes there was a mix of these two approaches. Education providers also used technology to deliver elements of the programme via online learning. Delivering modular content via e-learning means presented challenges, when that content was normally delivered via a range of face-to-face academic sessions (such as lectures and tutorials).

Education providers needed to carefully manage practice experience, to ensure learners were undertaking a range of practice-based learning. In some programmes

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with multiple employment partners, education providers were able to facilitate contrasting placement experiences for learners across different employers. This was more challenging when there was one employer partner, although for large employers like NHS Trusts or Local Authorities, contrasting experiences were often available for learners.

For all programmes assessed, we have required education providers to demonstrate how the range of practice-based learning is appropriate to support the delivery of the programme, and visitors have been able to make judgements against the standards. Education providers managed this in several ways, with some already having arrangements for their existing provision that would continue to work for apprenticeship programmes. Often, we would see a member of staff in place with a particular role in ensuring learners had a good, contrasting practice experience. Education providers also set expectations of what would be needed for a learner undertaking practice-based learning, contained through formal agreements with their employer partners.

With the outcome focus of our SETs, through these assessments, education providers were able to demonstrate that proposed programme structures were appropriate to the delivery of the SOPs for learners. The challenges faced were often logistical, which with careful management, education providers were able to overcome.

Curriculum and assessment

Generally speaking, education providers with existing provision told us that they were using the all or some of the same modules for apprenticeship programmes, or were amending these modules in small ways to fit with the model of the programme. Almost all providers noted that learning outcomes and assessment strategy would be reflective of existing programmes. Some providers decided to redesign their curriculum more fundamentally to deliver apprenticeship learning.

For existing providers, we did not see big problems with how programmes were delivering the standards of proficiency (SOPs). Challenges more often came from the integration of the End Point Assessment (EPA) into the programme. A requirement of the IfA is that apprentices complete an EPA. This assessment is run independently, and it being completed successfully leads education providers being able to access the final part of the apprenticeship funding. When developing standards, most Trailblazer groups decided to integrate the EPA into the assessment of the programme.

This meant that the way the education provider assessed the achievement of the learning outcomes was different for apprenticeship provision. This often linked to small changes in the delivery of the modules, so we needed to make judgements about how the learning outcomes and assessments, including the EPA, ensured learners met the SOPs for the profession.

Again, as the SETs are outcome focused they allows for providers to set up their teaching and assessment in multiple ways. Broadly, there was nothing in EPA requirements that was in conflict with our standard being met, and on a professional level, we had signed off that there was sufficient alignment of the occupational standard with our SOPs.

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Section 7: Looking to the future

Consistency of proposals

Recently, we have seen proposals becoming more consistent, with education providers often noting:

- apprenticeship provision is being contained and fully integrated within their existing provision;
- apprentices will meet the same learning outcomes in the same ways;
- apprentices will undertake the same modules alongside other learners through most of the programme (normally up to 300 credits); and
- apprentices will then undertake a module which contains the EPA.

In the above cases, education providers have been proposing apprenticeship programmes that broadly follow the same path as existing provision, but distinguishing the name of the programme in some way, for example by suffixing '(degree apprenticeship)'. These are often administrative distinctions for the education provider, and are more akin to adding a revised route through an existing programme, and noting this route has a different mode of study. We are therefore able to be more flexible in applying our 'general expectations' for considering how to assess these programmes. This may mean we assess more programmes via major change in the future.

Future operational work

The following is an overview of where each of the HCPC professions are in terms of development, correct as of 11 February 2019.

Profession	Stage	Operational interactions with HCPC
Arts therapists	Development – standard approved	None
Healthcare Science Practitioner (Biomedical scientists)	Approved for delivery – 31 March 2017	 3 programmes approved 1 assessment in progress
Podiatrists (Chiropodists / podiatrists)	Approved for delivery – 14 May 2018	 2 assessments in progress
Clinical scientists	N/A	None
Dietitians	Development – proposal approved	None
Hearing aid dispensers	Development – Standard approved	1 programme approved
Occupational therapists	Approved for delivery – 7 December 2018	 2 programmes approved 1 assessment in progress
Operating department practitioners	Approved for delivery – 28 June 2018	 3 programmes approved 4 assessment in progress
Orthoptists	N/A	None
Paramedics	Approved for delivery – 8 August 2018	 2 assessments in progress
Physiotherapists	Approved for delivery – 18 December 2018	2 programmes approved
Practitioner psychologists	N/A	None

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Prosthetists / orthotists	Approved for delivery – 31	None
	October 2018	
Radiographers	N/A	None
Social workers	Approved for delivery – 30	 6 programmes approved
	November 2018	 19 assessments in
		progress
Speech and language	Development – proposal	None
therapists	approved	

We can reasonably expect apprenticeship programmes to be proposed to us at any time from professions approved for delivery, and from professions at the latter stages of the development phase. In terms of considering future work for the Department, these professions are more likely to generate work along a shorter timescale, with the professions that are approved for delivery the most likely.

Section 8: Conclusions and recommendations

From early stages of apprenticeship programmes being developed for the HCPC professions, the Education Department has proactively engaged with external stakeholders to gain an understanding of the impact on our regulatory function. We have been able to feed into Trailblazer groups to ensure their proposals are compatible with regulatory requirements, and have been able to plan for spikes in externally driven operational assessment of apprenticeship proposals.

Regardless of the method of HCPC assessment, more issues were noted through assessments of apprenticeship programmes, but not so many to suggest there were any fundamental issues with meeting our regulatory requirements. The sector has been able to adapt quickly to deliver apprenticeship programmes, and the application of our standards has been a reasonable regulatory burden, whilst enabling change and ensuring public protection.

We have identified the following learning points, and changes to our approach for future work in this area.

Loosening the 'general principles' for the method of assessment

In the early stages of assessing apprenticeship proposals, having general principles to work to was useful. This helped with consistency, and developing the Executive team's understanding of this scheme.

To date, we have not needed to visit any programmes as a result of the full major change process (ie visitors recommending that we visit the programme to consider its approval). This shows that we are making good judgements at the notification stage of the process, in filtering out cases that should be visited.

For other major change notifications, we are able to make this judgement on the merits of the case alone, rather than by applying specific general principles specific to sectoral developments. Setting some general expectations for the Executive to work to when apprenticeship programmes were first proposed was very useful. Now, with increased knowledge and experience of the team reviewing these cases, it seems reasonable to relax these expectations which should result in reviewing more programmes via the

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major change process. We will make these judgements based on merits of the individual case, making a risk-based judgement about how similar the proposed apprenticeship route is to existing training in the profession. We will update our guidance where needed, to ensure this change in approach is clear to education providers.

Increased regulatory requirements in evidence submissions

The further documentary requirements when assessing apprenticeship programmes through the major change process helped education providers to put together a useful and understandable submission and visitors to frame their assessments against apprenticeship requirements. A documentary review of programmes that are intended to meet our standards differently in at least some fundamental ways is a riskier approach to assessment, due to generally not being able to talk to stakeholders to triangulate information.

Therefore, the further documentary requirements from the education provider should remain in place, to mitigate these risks. This also ensures that the education provider has thought in detail about how our standards may be impacted by the introduction of the programme.

Cancelled approval visits

An area of concern through this review was the high number of cancelled approval visits. The HCPC are not in control of education providers cancelling visits, but we can be aware of situations where this is more likely to occur. For apprenticeship programmes, this mainly happened when the EPA and funding band had not been agreed. Therefore, when significant areas of apprenticeships have not been finalised, we should ensure we work closely with providers around the readiness of their proposals, so we do not commit resources unnecessarily.

The new normal

Looking to the future, we should continue to engage with Trailblazer groups as they develop new apprenticeship standards, and underline or regulatory requirements to new professions as they near approval to run apprenticeship programmes.

These programmes can be quality assured in the same way that other programmes can, with the exception of the further documentary requirements noted above. On an operational level, the assessment of apprenticeship programmes have become a normal part of the Department's work. However, we should continue to be mindful of new professions entering latter parts of the development stage, to consider potential impact on our overall workload. To this end, we will continue to review our work in this area and provide an update report in the future.

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