



EPA - Reasonable Adjustments Report September 2023



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The Northern Skills Network (NSN) is a not-for-profit organisation which aims to represent training and education providers from all persuasions across the North of England and to promote the value of vocational and technical education, especially apprenticeships, to employers and other key stakeholders. NSN members consist of eight provider networks across the north: North East, Cumbria, Lancashire, Greater Manchester, Greater Merseyside, North and West Yorkshire, South Yorkshire Region and Cheshire and Warrington.

In total NSN represents over 300 providers, ranging from FE Colleges, Independent training Providers, Universities, Local Authorities, Community Voluntary Organisations and other stakeholders.

The challenges related to Reasonable Adjustments

NSN are aware that members report **ongoing challenges** with the End Point Assessment (EPA) process. NSN have launched a Business Plan and Manifesto for 2023 (1) and tackling the issues related to EPA is one of NSN's key priorities in 2023. NSN are involved in discussions with a range of stakeholders on these challenges e.g. the Department for Education, Cognassist, NCFE and the Institute for Apprenticeships and Technical Education. NSN are aware that Institute for Apprenticeships and Technical Education are actively working on revised guidance for EPA.

Reasonable adjustments can be defined as "any action that helps to reduce the effect of a disability or difficulty that places the apprentice at a disadvantage in the assessment situation" (2).

NSN member, the Greater Manchester Learning Provider Network (GMLPN) facilitated a webinar on Thursday 8th June on '**Understanding reasonable adjustments: implementation and execution**' with Dr Louise Karwowski, Director of Education at Cognassist (3).

The session explored the importance of reasonable adjustments and highlighted how they impact upon neurodiverse learners. Attendees from a range of different provider types were in attendance such as FE Colleges, Independent Training Providers etc.

During the webinar, attendees were polled on a range of questions related to EPA, End Point Assessment Organisations (EPAOs) and the challenges with the process. NSN member networks distributed the poll post-webinar to their own members to gather more intelligence. In total **72 participants** have completed the poll.

This report will detail the findings of the poll and make several recommendations based on the evidence provided.

Based on the findings of this report, NSN suggest the following recommendations:

Providers:

- Ensure that reasonable adjustments are discussed as early as possible with apprentices and employers and are embedded throughout all of the stages of an apprentices' journey, not just at EPA gateway.
- Discuss Reasonable adjustments with the EPAO as early as possible in the journey

End Point Assessment Organisations:

- Work with providers to ensure understanding and confidence in the EPA system and reasonable adjustments

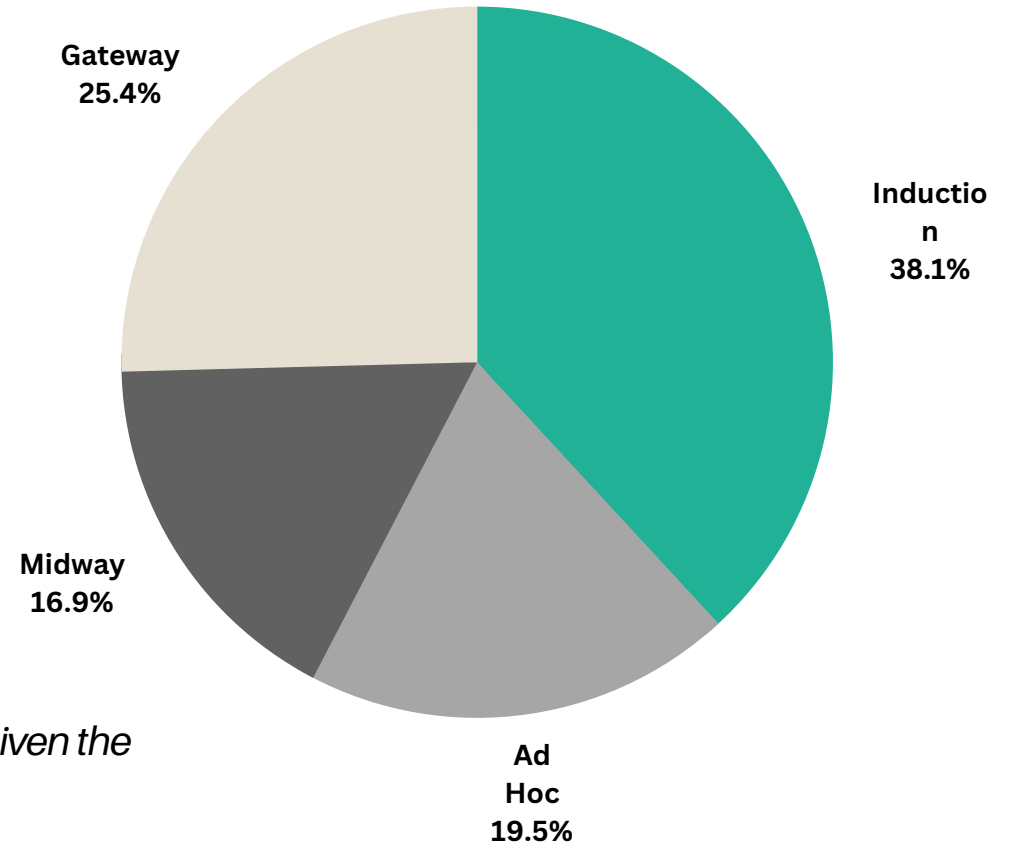
The Institute for Apprenticeships and Technical Education:

- Look at standardisation of process and policies across EPAOs
- Continue to develop and promote:
 - Guidance for Providers on what is expected of them
 - Guidance for EPAOs on what is expected of them

Respondents were asked how many EPOAs they currently work with, and responses ranged from one EPAO to more than 10. This variance is likely due to some providers, e.g., FE Colleges, offering a much wider range of apprenticeships standards.

NSN asked at what stage providers discuss reasonable adjustments with apprentices. The data shows that **not all providers are discussing reasonable adjustments at induction.**

At what stage do you discuss reasonable adjustments with apprentices?



Please note that providers were given the option to select multiple choices.

NSN note that it is recommended by the Institute for Apprenticeships and Technical Education for providers to discuss Reasonable Adjustments with apprentices 'as early as possible' (4). If reasonable adjustments are only discussed at Gateway with the apprentice, providers may not have sufficient time to discuss with the EPAO or be able to get the evidence required for the reasonable adjustment to be approved. This can cause challenges for all parties, but most importantly could mean that apprentices risk not receiving the adjustment they require which would enable them to achieve.

Barriers in getting Reasonable Adjustments

The most common barrier to getting reasonable adjustments reported was **evidence**.

Providers report **facing challenges obtaining evidence from learners such as a formal diagnosis from a specialist**. Often, providers feel that they are lacking clear guidance from EPAOs about what evidence is sufficient to enable them to ask for specific adjustments to be made.

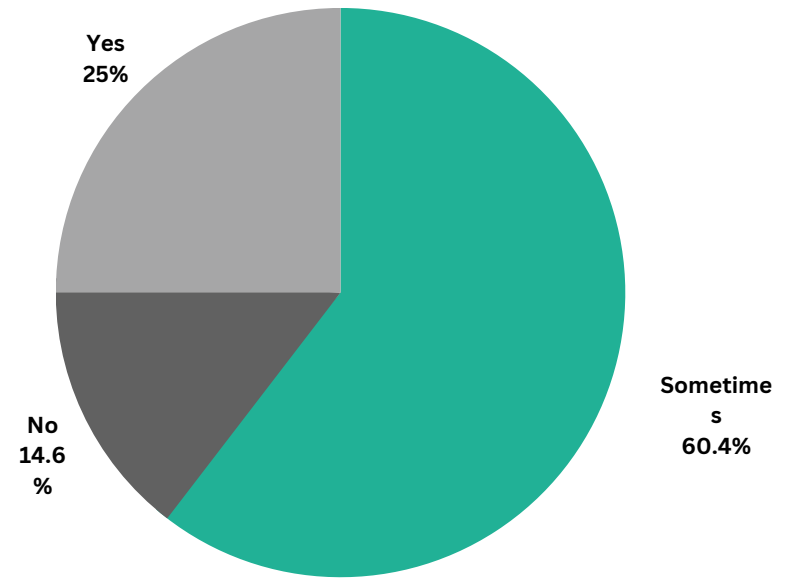
Respondents highlighted that **evidence that is sufficient for one EPAO might not be sufficient for another**, and that there is little explanation as to why this is. It is suggested that this is causing the reasonable adjustments process to be very confusing and time consuming for providers, which can impact on learners and apprentices.

Several respondents are concerned that EPAOs don't fully understand how difficulties affect learners in reality, and suggest that appropriate training on issues such as neurodiversity should be standard across staff making decisions.

This issue of a lack of standardisation across EPAOs is a running theme throughout the evidence NSN has gathered.

Barriers in getting Reasonable Adjustments

Is the process for applying for reasonable adjustments within EPA fit for purpose?

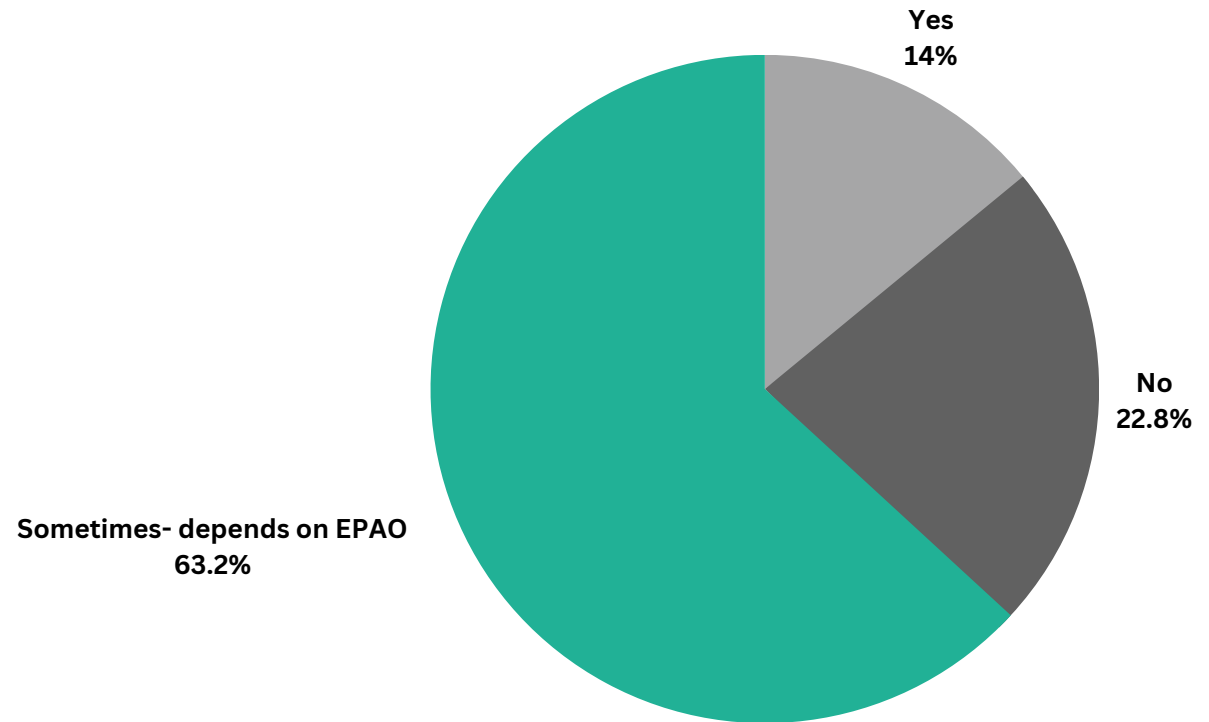


A majority of providers feel that the process for applying for reasonable adjustments is not fit for purpose.

A small number of responses suggested that EPAOs were not responsive or timely in getting back to providers who had questions about the process.

NSN asked if there are any specific apprenticeship standards that cause problems, but responses indicate that **challenges are universal across all apprenticeship standards.**

Do EPAOs explain their reasonable adjustments process properly?



A majority of providers feel that EPAOs do not always properly explain the process.

The most common improvement suggested was **better communication from EPAOs**. Responses indicated that it can be difficult to engage in dialogue with EPAOs about the application process, which is exacerbating confusion and making the process more time consuming.

Several providers suggested that EPAOs should be more flexible and trust providers' judgment more and highlighted the fact that providers have often worked with apprentices for long periods of time and understand their needs well, but it is noted that this would need to be evidenced effectively.

Some respondents suggested that simple measures such as a clear timeline, process flowchart and having one main point of contact for communications would make the process easier for providers and apprentices to navigate.

It has also been noted that there needs to be a clearer process of EPAOs recognising and explaining any errors that have been made in the application process.

NSN suggest that **clear guidance for EPAOs and providers** respectively would help to mitigate these challenges.

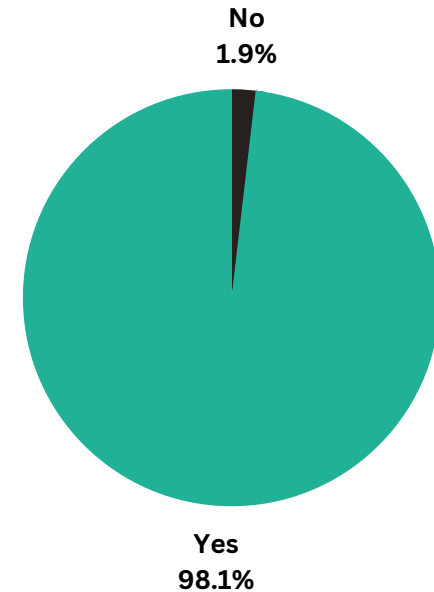
Several responses indicate a need for a clear checklist of what reasonable adjustments should be available for learners with different needs. NSN note that **Institute for Apprenticeships and Technical Education** have developed a reasonable adjustments matrix to help providers identify which needs are appropriate for their learners (4).

GMLPN have looked at the matrix as part of their **Supporting Autistic Individuals into Apprenticeships project**, and in January 2022 produced a report on the specific challenges autistic individuals face with the EPA process (5). NSN note that the guidance (4) that supports the matrix has been updated in Summer 2023, the guidance helps to explain when reasonable adjustments may be required, examples that can be applied and how they may be implemented in EPA. NSN welcome the development of this guidance.

NSN asked providers if the EPA process as it stands is fit for purpose. Responses to this question were very mixed, with a majority suggesting that the process is sometimes fit for purpose.

Finally, we asked if providers would like to see a standardised process across EPAOs. The vast majority were in favour of this measure.

Would you like to see a standardised process across all EPAOs?



NSN believe that The Institute for Apprenticeships and Technical Education should **look at introducing standard rules, guidance and processes in order to mitigate the challenges providers and apprentices are facing with the EPA process currently.**

These findings provided evidence and lead to the recommendations put forward.

NSN have shared this report with **Cognassist** who provided the following **quote in support:**

"The process of getting reasonable adjustments in place to mitigate barriers posed by a learning difficulty/disability should not be an additional barrier. Standardisation of process and acceptable evidence needs to happen to improve this, and make it less strenuous for educator providers to apply for adjustments for learners who need them. The process currently is a lottery and success for learners with additional needs is potluck depending on what is deemed suitable evidence, how easy/difficult and convoluted the process is and in some cases, whether any reasonable adjustments are accepted at all!"

Dr Louise Karwowski | Director of Education | Cognassist



1. [Northern Skills Network](#)
2. [CIPD policy on reasonable adjustments and special considerations](#)
3. [Helping every diverse mind thrive - Cognassist](#)
4. [End-point Assessment Reasonable Adjustments Guidance / Institute for Apprenticeships and Technical Education](#)
5. [GMLPN-EPA-Feedback-Paper-Final-Jan-2022.pdf](#)