AELP Mini Commission #2

Qualification Achievement Rates (QAR)/Accountability

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Final Report - June 2025

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FOREWORD

The apprenticeship sector has come a long way, but how we measure success hasn't kept pace. Our second Mini Commission dives into this disconnect by examining the current Qualification Achievement Rate (QAR) methodology and Apprenticeship Accountability Framework, and setting out clear steps for reform.

We need a smarter, fairer, and more flexible approach. One that recognises not just completions, but also positive destinations like employment progression or successful transitions between providers. Apprenticeship success isn't always linear, and our data systems should reflect that.

Through this report, we're calling for change: more detailed milestone tracking, stronger support for employer onboarding, and better collaboration between providers and assessment organisations. We also believe it's time to rethink some outdated terminology, like "off-the-job training", to make things clearer for employers and learners alike.

We're asking DfE to provide the sector with greater clarity on policy changes through a transparent roadmap, helping providers plan ahead with confidence.

These recommendations are grounded in real insight from robust research and direct conversations with providers, EPAOs and stakeholders. Together, they point to a more accurate, responsive apprenticeship model, one that truly reflects learner journeys and supports quality at every step.

We hope this report sparks the conversations and actions needed to move the discussions forward.

Ben Rowland

CEO | AELP

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INTRODUCTION

The Association of Employment and Learning Providers (AELP) launched its second mini commission into QAR and Accountability on 5 March 2025. The purpose of this mini commission is to consider:

> *"How data reporting and apprentice and employer actions can unduly affect a provider's QAR data, and identify possible solutions on how the system could be changed, with shared accountability (providers and employers) and fairer and more transparent measures".*

Following the release of 2023/24 apprenticeship QAR data on 28 March 2025, we now know that the national apprenticeship achievement rate has increased to 60.5% from the 54.3% rate in 2022/23 moving us closer to the ambition of a 67% achievement rate by the end of 2024/25, announced at the AELP National Conference in June 2022.

AELP believes that there is now the opportunity to influence changes to reporting methodology with a sharper focus on outcomes for learners, not outputs, and a clearer understanding of what greater employer accountability should look like without increasing regulatory burden and oversight. This also coincides with impending changes to the Ofsted framework and how this influences both the Apprenticeship Accountability Framework (AAF) and Department for Education (DfE) intervention.

This report is based on the findings of a sector survey ran over a three week period in March, roundtables with providers and End Point Assessment Organisations in early April, deeper discussions with four providers through case studies and additional provider/stakeholder information and research submitted to support our report and recommendations.

Note: this report was written prior to release of the 2025/26 funding rules and 24/25 QAR guidance.

RECOMMENDATIONS:

Recommendations build upon those outlined in the interim report and have been placed at the start of the report for ease of reference.

(* Appendix 3 shows some suggested impact/impact on QAR based on recommendations 2, 3 and 4)

Opportunities to test and pilot new measures and methodology:

1) Use new apprenticeship models (foundation apprenticeships) to pilot new/a broader range of QAR measures, calculations and outcomes to recognise positive destinations, i.e. progression and employment outcomes, alongside achievement/completion rates.

Broaden current reporting methodology to take account 'positive destinations' and introduce more milestone points:

2) Recognise all contributions to success, particularly where learners move between employers or providers. Allow providers to flag 'positive outcomes' with supporting data/evidence and adapt QAR metrics to improve data validation and tracking through other systems (i.e. HMRC) to evidence progression outcomes and transfers.
3) Redefine QAR milestone points – publish simple, easy to access additional data sets and wider outcomes alongside QAR data i.e. gateway entry data, End Point Assessment (EPA) pass rates and grading outcomes, and retention alongside achievement data (i.e. on Find an Apprenticeship).

Employer Responsibilities and Commitment

4) Strengthen employer responsibilities and commitment with more robust training and onboarding for new employers, with simplified data capture/transfer between providers and employers.

5) Allow apprentices to 'rate their employer' on Find an Apprenticeship to allow future learners to make informed career decisions when considering an apprenticeship.

Provider and EPAO Collaboration

6) Continue to encourage stronger and closer communication and collaboration (in place of transactional practice) to ensure earlier engagement to manage EPAO capacity/oversight. Any EPAO policy changes will require robust guidance outlining clear role definitions and responsibilities of providers, EPAOs and employers. Both providers and EPAOs should be involved in the early-stage assessment plan design and reviews (where possible) to ensure practical implementation with appropriate controls, including internal and external sampling. EPAOs should maintain a strong role, particularly in high-stakes assessments, to preserve independence.

Off the Job Training (OTJT)

7) Rename OTJT to remove out of date terminology and confusion for employers and learners, to better reflect the time spent 'developing and learning new skills' with re-branded, centralised guidance and supporting documentation.

Policy Announcements and Sector Impact

8) DfE to produce a roadmap of current and future changes to better inform the sector and help to futureproof compliance, where possible.

METHODOLOGY

The **survey** received 58 responses (see appendix 1 for questions). Survey findings were used to facilitate the roundtable discussions and case studies.

Provider roundtable discussions held in April commenced with an overview of survey findings, from which we then delved deeper into the following questions:

1) How does current data reporting methodology, and apprentice and employer actions, unduly affect a provider's QAR data?
2) What do you think the impact of recent and future policy decisions will be on QAR data?
3) How could the system be changed, with more shared accountability (providers and employers) to give fairer and more transparent measures?

EPAO roundtable discussions focussed on a different set of questions, which included:

1) How do you think a more simplified EPA process could positively and negatively impact on a) you as an EPAO and b) providers' behaviours?
2) How do you think the recent flexibilities for 19+ Functional Skills Qualifications will impact on EPA?
3) Do you feel changes to AAF intervention thresholds would positively impact on provider behaviours in relation to EPA?
4) Do you think that changes to how learners who are passed planned end date (PPED) are viewed (through AAF intervention) would positively impact on provider behaviours in relation to EPA?

5) What do you feel are the main barriers to achievement/completion and reasons for withdrawal?
6) Do you think having more employer accountability in the system would be positive or negative?

FINDINGS AND ANALYSIS

Part A - Provider Roundtable Feedback (7 & 10 April 2025)

This part of the report summarises the key challenges obtained via feedback from apprenticeship providers and employer providers during our roundtable discussions. It explores the complexity of learner transfers, the limitations of the current QAR and Apprenticeship Accountability Framework (AAF) methodologies, and highlights the need for sector-specific, flexible, and fairer systems and measures.

Transfers and Withdrawals:

Providers are often unfairly penalised when apprentices transfer to new employers or providers. The original provider may deliver the bulk of training but receive a negative QAR, while the new provider gains credit for completion.

Learners often move for positive reasons beyond the provider's control i.e. better wages, job security, or new opportunities. These moves are not necessarily negative outcomes but are currently reflected as such in reporting metrics. In some sectors i.e. Adult Care or Early Years, apprenticeships are viewed more as jobs than long-term careers, which can exacerbate these trends.

Rigid employer policies (e.g., dismissal after failed exams) and inflexible EPAO schedules can also unduly affect learner outcomes. Roll-on/roll-off programme models are misaligned with hard ILR deadlines, which distorts reported achievement/completion data.

Validated evidence for positive outcomes is difficult and expensive to collect. While some providers invest in employer tracking or exit surveys, concerns about data sharing and confidentiality persist. Integration with external databases like HMRC could help confirm successful learner transitions.

QAR should reflect not only completion but also learner progress, time on programme, and engagement level. Where apprentices gain significant knowledge, skills, and behaviours (KSBs) providers deserve recognition, even if the learner does not complete the full apprenticeship.

Despite good information and guidance (IAG), retention remains a challenge. Young learners often leave around 5–6 months into a programme when they fully realise job expectations, which is outside of the 42 day requirement for enrolment on the ILR. Government policies (focused on younger learners) must address this pattern. COVID's long-term effects also continue to impact QAR.

Sectors such as Adult Care are may appear to be underperforming by QAR metrics, but internal and external comparisons can show otherwise. Achievement/completion rates need sector-specific context for accuracy.

Employer providers support integrated assessment but raise concerns about licence-to-practice qualifications prompting early exits. In sectors like housing and the NHS, learners often leave as soon as certification is gained. Meanwhile redundancies, particularly in business admin, are increasing due to current economic pressures.

Many young apprentices are unaware of their status or contract terms when starting an apprenticeship. Providers report higher dropouts on lower levels standards, especially among young people. Industry qualifications desired by learners are often unfunded, and employers are reluctant to cover the cost commercially.

Limited EPA windows, and lack of specialist pathway end point assessors, also cause delays.

The AAF is seen as too blunt, failing to distinguish between sectors or engagement duration. PPED, while fairer, remains a binary measure. Outdated Off-The-Job Training (OTJT) metrics need modernisation.

Employer Accountability:

Risk and transparency: Providers often carry the risk in apprenticeship delivery but lack visibility into employer practices, making it difficult to assess potential risks before engagement.

Incentivising positive behaviour: The system should focus on rewarding good employer practices, rather than penalising poor ones. Positive reinforcement is preferred over disincentives.

SME sensitivity: Accountability measures should consider excluding SMEs, as rating smaller employers could discourage their participation in apprenticeship schemes.

Employer switching: Employers can easily switch providers, which may undermine accountability efforts and create consequences for providers without recourse.

Employer awareness and capacity: While employers need upskilling to understand their impact on outcomes, there are concerns about their willingness or capacity to engage in such learning.

Metric design: Any performance framework would need to be carefully designed and appropriately pitched, with clear, relevant metrics tied to outcomes.

Apprentice Feedback:

Providers currently lack access to apprentice feedback on employers; gaining visibility into this would be valuable for improving decision-making.

Impact of recent and future policy decisions on QAR data:

There is a growing concern around how QAR links with the proposed Ofsted scorecard. Many providers feel that the framework is shifting back towards a heavy reliance on validated data. This is seen as a double-edged sword - while data can help demonstrate strengths and justify progress ('distance travelled'), it also poses risks for providers with small learner volumes, where low numbers can disproportionately affect QAR outcomes, or for providers in high turnover sectors.

In-year QAR data could be more representative but is not currently used. Concerns were also raised about how sector-specific impacts (e.g., employer closures due to cost of living) will be considered during inspection. Calls were made for an overarching QAR measure for foundation and short-duration programmes, when introduced.

The recent flexibility allowing 19+ learners to bypass Functional Skills Qualifications (FSQs) before gateway is seen as a largely positive shift. It puts FSQs on a more even footing with other qualifications, though the long-term impact is still unknown. While most providers report that learners continue to opt in for FSQs, there are sector-specific pressures (e.g., marine and NHS sectors) where FSQ completion is still expected. That said, the flexibility helps many learners stay on

programme who might otherwise have withdrawn. However, employers may still impose restrictions or opt not to extend contracts if FSQs are not completed.

A more simplified EPA process could significantly boost QAR. Suggestions include basing QAR calculations on gateway approval rather than EPA completion by the academic year-end, allowing final outcomes to be captured up to the hard deadline of R14 (generally around October). This would relieve pressure from long EPA windows, which currently delay completions and distort performance data. Integrating qualifications such as licenses to practice has also proven effective in improving retention and QAR. This is discussed further in part b.

System Reform: Shared Accountability, AAF, PPED, and Programme Blockages

There is a strong call for more balanced accountability between providers and employers. The Apprenticeship Accountability Framework (AAF), while a useful dashboard, is seen as a blunt instrument. QAR calculations are particularly criticised as unfit for purpose, with a desire for more nuanced and sector-sensitive metrics. Stakeholders suggested benchmarking against sector averages or using in-year trajectory data, rather than relying solely on arbitrary year-end figures. However, concerns were raised about the risks of premature judgment based on in-progress data.

Performance management discussions between providers and the DfE are often based on outdated data, reducing their effectiveness. Sector delivery biases (e.g., in healthcare) can distort Break In Learning (BIL) and Past Planned End Date (PPED) figures. For instance, apprentices returning from maternity leave may inflate PPED data due to time needed for reintegration. While Ofsted views PPED as a useful performance and quality predictor, DfE places less emphasis on it in the current framework. Many PPED instances result from external issues such as EPAO delays or unavoidable learning gaps. The continued use of PPED should be re-evaluated, particularly where context matters.

There was widespread agreement that non-fault withdrawals (e.g., redundancy, redeployment) should not negatively impact a provider's QAR. These events are outside of the provider's control and do not reflect quality of delivery. Transfers were also flagged as a data distortion factor, particularly if they are counted as withdrawals.

The current measure of OTJT in the AAF is seen as simplistic — essentially verifying ILR input. Yet OTJT remains critical for funding assurance. There is a need for more meaningful evaluation, focusing on the quality and relevance of training delivered by employers, not just the quantity. Many feel OTJT remains too old-fashioned and has not kept pace with modern apprenticeship standards.

Several systemic blockages were identified for on-programme learners:

- Employers, in some cases, enforcing their own functional skills policies regardless of official flexibilities.
- Learners achieving mandatory qualifications but unable to complete EPA.
- Over-assessment, particularly in standards like HR/CIPD, where learners must produce excessive evidence.

EPA reform concerns: potential fee increases, added burden on providers, and the risk of learners 'shopping around' between versions of standards to avoid more difficult assessments.

Summary:

From the above, it is clear that current QAR and AAF systems do not adequately reflect the realities of modern apprenticeships. A revised, more flexible, data-informed and sector-based approach is needed to support providers, employers, and learners alike.

Part B – End Point Assessment Organisation (EPAO) Feedback (11.04.2025)

A roundtable discussion was also held with EPAOs and the following is a summary of the main points:

Simplification and Flexibility of End-Point Assessment (EPA)

- Concerns were raised that proposed simplifications may add complexity for EPAOs, despite delegating tasks to ITPs.
- One EPAO supported the EPA review to enhance efficiency, suggesting shorter EPA durations and on-programme assessments could help. However many providers are satisfied with current EPA setups.
- Potential positives were highlighted, such as less duplication and EPAO-led redesigns but warned of risks to quality and cost objectives.
- There is a need for balanced design input and safeguards to prevent assessment shifts that reduce credibility.
- Assessment design is inherently a compromise and quality of training might be impacted by available funding.

Functional Skills Qualifications (FSQ) - Flexibilities and Impact

- Have observed minimal initial impact but welcomed the flexibility, particularly for STEM sectors.
- Have noted increased collaboration at gateway and flagged concerns over re-sits and resource strain.
- Emphasised understanding the value of FSQs for different apprenticeships.
- General agreement that it's too early to fully assess FSQ impact, with monitoring ongoing.

QAR (Qualification Achievement Rates) and Accountability

- Importance of early learner visibility to avoid EPA issues was stressed. Late learner visibility and lack of coordination affects EPA outcomes.
- One EPAO warned of potential QAR and financial risks if EPA responsibilities are diluted.
- Need for modernising of QAR metrics and removing provider-irrelevant withdrawals.
- Shared responsibility needed for high achievement/completion rates across the sector.

Assessment Approach and Intervention

- General consensus on the need for proportionate, effective assessment plans.
- Recognition that successful EPA outcomes rely on provider engagement and early learner registration.
- Support for structured systems that promote good practices, such as the SIAS registration model.

Key Concerns Across Stakeholders

- Whether simplification compromises quality and rigor.
- Clarity of roles and responsibilities under the new model.
- Readiness of the sector for assessment and regulatory changes.
- Need for safeguards to maintain independence and system credibility.

Summary:

Any changes to EPA will require guidance outlining clear role definitions and responsibilities of providers, EPAOs and employers. Both providers and EPAOs should be involved in the early-stage assessment plan design/reviews (where possible) to ensure practical implementation. The EPA system needs to embed multiple Quality Assurance stages, including internal and external sampling, whilst EPAOs should maintain a strong role, particularly in high-stakes assessments, to preserve independence.

Part C – Group Training Association (GTA) Members' Feedback (16 April 2025)

The discussion with GTA members focused on the same questions as the provider roundtables, but with less emphasis on current methodology due to GTA members operating in sectors where achievement/completion rates tend to be higher. Instead the session focused on employer accountability, apprentice exit surveys, the impact of recent and future policy decisions and how the system could be changed moving forward.

Employer Accountability in Apprenticeships

- Importance of employer accountability acknowledged, but punitive measures could discourage engagement.
- Suggested positive incentives like government accreditation for high apprentice completion rates.
- Call for an accountability framework for employers similar to that for providers with employer-specific achievement/completion data showing on the employer Apprentice Service account, visible to providers – felt this would aid in risk assessment and quality discussions with potential employer partners. Encourages employer oversight to make improvements.
- Emphasis on quality and completion rates over apprentice numbers.

Apprentice Feedback & Exit Surveys
- Current feedback is limited to provider ratings; employers are not rated.
- Support for detailed and sensitive apprentice exit surveys.
- A more nuanced system would prevent unfair blame allocation.

Support & Resources for Employers
- Employers need more guidance and clarity on roles and responsibilities.
- Suggested shared resources should be available, for example, to support line managers.
- Reduce duplication and ensure standardisation by centralising support materials available to all employers.

Policy Announcements & Sector Impact
- Sector impacted by vague, poorly timed announcements (e.g., during National Apprenticeship Week), recent announcements have lacked clarity, especially around EPA and functional skills which risks a disconnect between policy intent and implementation.

Endpoint Assessment (EPA) & Gateway Issues
- Providers unfairly bear accountability post-Gateway.

- Delays and extended EPA timelines affect QAR and cause frustration.
- Pandemic-related delays have ongoing impact.

Measuring Success & Non-Completions
- Not all non-completions are negative; some apprentices find better paths.
- Support for a 'distance travelled' model to measure learner growth.
- Recognition of broader outcomes beyond final qualifications.

Off-the-Job Training (OTJT)
- Requirement for extra employer sign-off seen as redundant - gateway approval should suffice if minimum OTJT met.
- Calls for better ways to measure and manage OTJT.

Transfer & Continuity Challenges
- Switching standards currently counts as dropout, negatively impacting QAR.
- Need for better recognition of prior learning (RPL) to reflect continuity.

EPA Timing and Reporting
- Long EPA durations skew academic year reporting and affect metrics.
- The 'past planned end date' (PPED) issue inflates performance challenges on dashboards.

Summary:

There is a strong call for increased employer accountability in apprenticeships, but with a focus on quality and completion over numbers, and a preference for positive incentives rather than disincentives for employer accountability. Improved visibility of employer-specific data is suggested to support quality improvement without discouraging participation. Feedback systems should include employer ratings and detailed apprentice exit surveys for fairer evaluations. Employers also need clearer guidance and centralised resources. Concerns were raised about vague policy announcements and misaligned implementation, especially around EPA and Functional Skills Qualifications. Delays in EPA and issues post-Gateway affect providers and skew QAR therefore broader measures of success, such as a 'distance travelled' model, are supported. OTJT requirements need streamlining, and better handling of transfers and prior learning is needed to reflect true continuity. Finally, long EPA timelines and 'past planned end date' issues distort reporting and performance metrics.

Part D – Case Study Findings

Visits/online discussions were held in April and May to obtain more in depth information from four providers. A summary of the discussions and feedback are outlined, per provider, below:

- **Provider 1 – ITP based in the North** *(AELP membership category 1001 – 2500 learners)*

Background:

Prior to the case study, the provider shared following statement:

"Although there will always be a few programmes lagging behind industry averages, our overall figures are consistently well ahead of industry standards and often surpass many of our competitors.

At the end of this month, the QAR data for 23/24 will be published, and we can expect to see a rate of 77%. Some key standards of ours are around 93% for Data Technician, 82% for ICT, and 79% for Digital Marketer. This performance is incredible and a testament to our principled approach. However, while these figures speak volumes to us and those within the apprenticeship industry, they are not as accessible or easily interpreted by potential employers"

Summary of Discussion:

QAR

The provider delivered a project to make some simple changes which have resulted in increased QAR rate, however, due to time lags they are only just seeing the result of this 4 years later. They use a 120 retention day metric looking at progress after 4 months to ascertain how many learners are still on programme. They also look at early retention in order to frequently and robustly monitor on programme learners, alongside analysing the reasons for withdrawal. Highest ranking reasons for withdrawal are learner commitment and conduct. The provider found that these early and frequent monitoring/measures, OTJT reporting and transparency with employers at 6 months also helped to improved achievement across the board.

They suggested the need for an ITP early retention indicator, relative to the programme duration, published around March time. Employers understand retention rather than QAR - the only time providers are asked for QAR data is from bigger enterprises, usually levy paying employers i.e. Jaguar Land Rover and some council procurements on certain standards.

The provider feels that it tends to be the provider with the best sales pitch that wins the business, rather than the best QAR. QAR is very outdated but should be driven more for businesses to see as a Value for Money (VFM) metric for businesses. If QAR was understood by more employers, it could inform them when choosing an apprenticeship provider, helping deliver greater VFM. However, given the lack of understanding of QAR among employers, the employer often needs QAR rates translated or explained. The provider wants employers to care more about QAR as a means of achieving greater VFM and Return on Investment (ROI) with more scrutiny on providers that deliver large numbers but don't deliver good outcomes. The provider also believes that proposed EPAO changes will speed up the process which is good.

AAF

Lots of resources go into analysing and tracking provider performance and the provider believes that all providers should have some scrutiny along these lines, built in to AAF from early retention perspective particularly for providers who deliver over a certain amount of apprenticeships per year.

They would like to see AAF used as a temperature check, not to measure performance and drive change. Other providers may be delivering lots of starts but come under the threshold of intervention. As QAR increases, it would make sense to increase intervention thresholds.

ILR

They like the idea of 'positive outcomes' but believe this needs validation as it could open a can of worms with subjective opinions and require some thresholds to manage planned end dates and percentage completed, retained etc. They don't use ILR withdrawal reasons as they use their own system to identify withdrawals with 15 metrics on root causes. The most common leaver root causes are commitment across the board, conduct of learners and the learner not knowing what they're signing up for and getting dismissed from the workplace. If the AAF looked at learners leaving at 4 months and 6 months, this would also address issues around time lag.

Off-The-Job-Training (OTJT)

OTJT is tracked during early intervention metrics to see how many hours have been logged – it makes sense to have early focus on this. Low OTJT is indicative that the learner is more likely to leave. Learner progress is managed weekly to identify risks but sometimes the provider only becomes aware when it's too late so they can't always affect it. All learners on programme are tracked and if deadlines are missed, will be flagged, as will absences. This is used internally as a flag to identify learners as a risk. However the structure, training and delivery models of all providers are different. The most important thing to consider is 'does the learner have entries in each month and is this evidenced, with regular check-points implemented' however this would also depend on what e-portfolio system providers are using which is usually the ones that providers can afford.

Apprentice Feedback

There is currently a statement that learners can agree/disagree on Find an Apprenticeship and the provider gets their own feedback, however, if apprentices could provide feedback half way through their programme, the provider could intervene sooner, if needed.

Overall summary:

Provider 1 has implemented early retention strategies such as monitoring at 120 days, transparent employer communication, and tracking Off-The-Job Training (OTJT) which have led to improved QAR outcomes, though results are only just emerging due to time lags. Commitment and conduct remain top reasons for early withdrawal, and there's a strong belief that QAR should be reframed as a value-for-money (VFM) metric to better resonate with employers, who currently respond more to retention than QAR figures. They advocate for an early retention indicators metric, published annually, and suggest that the Apprenticeship Accountability Framework (AAF) include graded QARs and act as a "temperature check" rather than a performance driver. While positive withdrawals are seen as useful, they require validation to avoid subjective bias. OTJT data is seen as a key early risk indicator, although provider systems vary. Feedback from apprentices midway through their programme is also highlighted as valuable for timely intervention.

- **Provider 2 – FE College based in the North** *(AELP membership category 500 – 1000 learners)*

Information provided from 23/24 Data - Overall achievement rate 66.1%

"We had a further 54 who went through gateway before the 31/07/24 in line with their end of learning date, 33 of which achieved in August or early September before the R14 ILR, but they don't count as they need to have sat EPA by 31/07/24 to count. This metric means providers can't be as flexible anymore with Roll on Roll off dates and are making decisions on the length of a programme for the wrong reasons. If this 33 had counted our overall achievement data would have been 68.2%". *More specifically it would have impacted on the following standards having approved achievement:*

- *Carpentry and Joinery L2 overall achievement 80% with the 8 extra 82.5%*
- *Bricklayer L2 overall achievement 56.3% with the 11 extra 62.7%*
- *Engineering Operative L2 overall achievement 58.8% with the 2 extra 63.15%*

Summary of Discussion:

QAR

The provider suggested that achievement data should be based on those who have sat and achieved by R14, not 31st July – this would allow for more flexibility and planning for end dates and EPAO capacity. R14 is the point that 16-18 classroom based provision is counted, so why not apprenticeships? For example, if a learner achieves gateway in March often EPA is not possible until August but this takes the completion outside of the in-year period for QAR. For those learners who go PPED, the employer is still paying them and the provider is still working with them (often unfunded) but learner can't get a pay rise until achieved. This is forcing providers to manage start and date dates and reduces flexibility.

Business decisions often come down to funding and Colleges have moved away from some sectors as delivery in them is not financially viable. ROI on apprenticeships is less than that for 16-18 and adult funding. Earning only starts when learner is classed as on programme but there is a lot of work to do upfront and no current incentive to ensure quality of Information, Advice and Guidance (IAG).

ILR

Positive outcomes and transfers should be recognised, not classed as withdrawals. Ofsted consider reasons in provider's control, outside of provider's control and market focus therefore QAR should do the same. Funding for withdrawals is based on time, not progress (receiving provider takes on the costs) – the provider believes there should be some way to separate this based on progress.

Destination fields on ILR were removed for 16-18 but not apprenticeships – they should all be the same.

AAF

AAF works well but needs to run concurrently with QAR. AAF currently looks at total number of learners but QAR split is the biggest bugbear currently. AAF intervention benchmarks are also not clear.

The AAF also only shows the base case, not live data, due to time lags.

OTJT

OTJT training can be very confusing for employers and learners – this should be changed to 'training in the workplace'. Example, if a 16 year old starts their first apprenticeship they won't be 'on the job' for a period of time so all training could be classed as 'OTJT'. OTJT can be monitored effectively when on day release, but if the learner is not released for OTJT for a day, it is hard to get reliable data – some logged hours could be fictional. Learners doing higher level apprenticeships (or even those lower level programmes) may want to study on weekends but this isn't currently counted. Maths and English should also be counted in OTJT.

Systems for logging OTJT vary depending on platforms used. Theres should be a centralised system to log this.

EPA

Most EPAOs have service agreements to register learners within a certain time period but it can get messy with account credits if learner doesn't progress.

Some EPAs are not viable i.e. employer closing business for 7 hours to allow time for the assessment, assessments in customer's homes (example tiling apprenticeships). These forms of EPA will turn businesses off from engaging with the apprenticeship system.

"For the Carpentry and Joinery apprentices and the Brick apprentices, although EPA was planned in advance the EPAO companies could not give us dates till August, so this is out of a provider's control. I have 2 examples from other North West based colleges feeling this again this year. One College have stated they have applied in April for EPA for Electrical but are being told there is nothing available until August. Another College have their own EPA centre for Automotive and are being told in April that for IEPA's it will be August"

Functional Skills Qualifications (FSQs)

16-18 year olds should have the same FSQ flexibility as 19+. For example, a hairdressing learner on an apprenticeship and not completing due to FSQs will walk away with nothing. Whereas on classroom based L3 they achieve a qualification in the same scenario. This sways learners more towards classroom based learning. Current FSQ rules for 16-18 are also stopping progression. The two routes need to be aligned.

"The other thing we discussed was the impact of FSQs on achievement for 16-18 and how impossible it is for some to get through the L2 in the time on the L3 Apprenticeship. This is not in line with Study Programme Conditions of Funding where a 16-18 can still achieve their main programme even if they don't achieve their FS or GCSE resit. Stats nationally show us that only 13% of 16-18 are passing their math resit and 22% for English, yet a 16-18 apprentice has to achieve FS L2 if they want to achieve their apprenticeship and progress in their career!!!!"

Apprentice Feedback

Apprentice and employer feedback at gateway should be **mandatory** then fed into the 'Find an Apprentice Training Provider' website to give more accurate picture alongside achievement rates. Search should show results based on 'nearest provider' rather than 'delivered in the workplace'.

Overall Summary:

Provider 2 highlighted a strong case for aligning QAR calculations with R14 rather than the July 31 deadline to better reflect real achievement timelines, particularly where EPA delays are beyond the provider's control. Providers face funding and planning challenges due to rigid timelines, and positive outcomes like transfers and progress should not be classed as withdrawals. There is a call for greater consistency across frameworks like ILR and AAF, which should account for lagged results and differentiate between factors inside and outside provider control. Off-The-Job Training (OTJT) remains confusing for learners and employers and should be rebranded and centralised, with flexibility for varied learning formats like weekend study or Maths and English inclusion. EPA scheduling issues and FSQ requirements are also seen as major barriers, especially for 16–18 learners, whose progression is hindered by stricter rules compared to classroom-based peers. Feedback from apprentices and employers at gateway should be mandatory and linked to public provider profiles to improve transparency and inform choice.

Provider 3 – ITP based in the Midlands *(AELP membership category 101 - 250 learners)*

This provider focuses on provision in the creative sector. In addition to the discussion they have also provided us with some robust tracking information that considers their QAR, achievement rates by standard, equality and diversity, ethnicity, age and gender data, a deprivation index and destination data. Although not included in full in this report, this shows the additional work that some providers are doing to track and monitor their learners:

"We been working to visualise our QAR data over the last few years and are currently in the process of updating our 'in year visualisation'. We did see a dip in QAR during covid, but are now back to

78.29% for 2023/24 and for a provider of 160 learners we are in the top 10% of providers in this category. We have one outlier on with Digital Marketer but the standard has design issues.

Retention and pass rates remain high if the learners stay on programme it is over 90%. We have quite an even split between age of learners, around 80% SME and 20% Levy payers. This year we have had 22 leavers and it is an even spilt in the age [of learners] but the reasons are mostly due to one reason which are "resigned from role" or "made redundant.

"Apprentices normally leave about 3-6 months in to apprenticeship if employer linked issues are a cause – e.g. often end of honeymoon period. Destination data shows 83 learners progressed to full time work".

Summary of Discussion:

QAR

It would be much more useful to have "real time" data so that the provider can carry out a sense check, even if it was every quarter rather than monthly. QAR being 10 months behind when published isn't helpful because of the level of uncertainty and the planning cycle has reduced from 3 years, to 1 year, to 3 months. With so much uncertainty it isn't "worth planning" against speculation. It is then hard to then plan cash flow and decision about contracts.

The provider suggested linking QAR more closely to the Quality Improvement Plan (QIP) and using the data to inform the QIP. A couple of years ago pass rates were okay but distinction rates were poor. The provider then started to benchmark what distinction looks like and this has led to massive growth. The provider has also started looking at leaver reasons to understand how interventions can improve situations and look for trends and to intervene in case reviews.

QAR is likely to be understood by staff in the provider's Management Information Systems Operational teams, and at a Senior Management Team level, but it would be beneficial for the Business Development and Delivery team to understand QAR and why it is important. Delivery teams are aware of their own data but not necessarily how that fits into the overall rates and it is difficult to be collaborative (across the organisation) on this element even if sharing support with other areas like Initial Assessment process. The organisation said additional DfE training/support would help as there is very little transparency around the changes and it is incredibly difficult to get a response to questions from the DfE service desk.

They would also like to be able to share national statistics on why employer/apprentice relationships break down, rather than just their locally held data (new and existing employees). Also, it would be useful to know what the leaver/achievement rates are for existing employees and new starts into business.

AAF

The provider carries out monthly checks on the dashboards but trusts internal data more, and noted that it is easier with the payments side, and that having a visual is useful but it is harder to keep up with the volume of changes.

ILR

The leaver reason is a restrictive ILR field and 97 code (Other) is so broad.

Taking on transfers is a huge risk. When they did take on learners from another provider, they spent a lot of time analysing the data they received about the learners prior to accepting them due to the concerns about impact on their own QAR.

A number of apprentices on the flexi job scheme weren't taken on as progress wasn't where it should have been. The learner is penalised when progress hasn't been made and provision has been the challenge. If there was a separate code in these instances, it would make the system fairer as it is currently too high risk, leading the provider to question who to take on depending on the progress and level of funding left available. This could be negotiated with the employer to make up the short fall but employer very unlikely to do this – which comes back to the question of more employer accountability as part of the any future changes.

OTJT

The provider suggested removing the OTJT metric because guided learning hours were never measured and progress would be a more appropriate measure rather than number of hours. Employers don't see much value of OTJT in itself, but instead judge hours on progress.

If not removed then a wider definition of what could be eligible for OTJT would be welcome, i.e. mocks, revision and preparation. There is no parity with other forms of technical education because this is built in for other provision types like 16-19.

Also there needs to be more transparency on what is deemed as acceptable OTJT and will be expected to see in an audit; not just the types of activity but what this looks like on "paper".

The provider is concerned that shorter duration apprenticeships will not mean more money, but a reduced cost or more intensive use of current funds; it won't mean less work just less time. Whilst the 20% completion payment comes at achievement, not at gateway, there is still cost included.

Apprentice Feedback

The provider is clear on how employer and learner feedback is collected internally, but this isn't the same method, topics or frequency that DfE will collect.

The provider believes it is difficult to make suggestions as they don't want to increase workload for staff but there could there be an automatic questionnaire or form for based on ILR data that is submitted. This should be the responsibility of DfE, given that success should really be who is still in post 12 months plus as its about starting a career rather than just achieving. The DfE could be asked to follow up with a 5 -10 learner sample and then aggregate this across the country. Currently progression is too anecdotal with data not there to support claims.

It would also be nice to have more transparency i.e. learner feedback (ongoing) and learner destination and employer feedback on a quarterly basis. Doing an annual survey isn't sufficient - It would be useful to know how the provider is comparing with other providers and have size groups for benchmarking for the feedback.

Overall Summary:

Provider 3 expressed the need for more timely, quarterly QAR data to support planning and improve responsiveness, as the current 10-month delay renders it ineffective. Financial uncertainty and shifting planning cycles hinder long-term decision-making, while linking QAR data directly to Quality Improvement Plans has shown promise, particularly by benchmarking distinction rates. There's a desire for clearer staff training and greater internal understanding of QAR across all teams, as well as improved transparency and responsiveness from the DfE. Concerns were raised

about the risk and fairness of taking on transferred learners and those from flexi-job schemes, suggesting the need for differentiated ILR coding and greater employer accountability. Off-the-Job Training (OTJT) is seen as an outdated metric, with calls to either remove it or expand its definition to include wider activities like revision and mock exams. Feedback mechanisms for apprentices and employers need standardisation and automation, ideally led by DfE, with regular, comparable data on learner destinations and retention post-programme. Overall, more real-time data, flexibility, and systemic clarity are needed to make QAR meaningful and actionable.

- **Provider 4 – ITP based in the South** *(AELP membership category over 5000 learners)*

"We do use the Industrial strategy and have a view of the future workforce, workforce size and skilled worker density piece of work but there is very little information out there on what the demand will be, no idea when this will happen and no idea on what the workforce size will need to be to meet this or what the skills requirements are. Durations of apprenticeship programmes also have an impact e.g., new homes needed in 2028, apprentices should have started 2 years ago to be ready. The lag and lack of forward planning is difficult to plan for, there always seems to be moving targets.

We are specialists in a narrow field and a large provider with two hats on, outcomes and getting people through successfully, but also charitable outcome is to support the sector in a non-competitive way. 'Collaborative competition' bleeds into a whole set of issues around subcontracting (are moving towards all direct delivery) but subcontracting is helpful from the charitable angle. 25% subcontracting rule is a potential issue, part-programme subcontracting is the model used. When managed well it's a good thing but because it's 'arm's length' it can be difficult to maintain quality".

- *Want all apprentices to have the best chance of achievement and approach subcontracting the same as direct delivery.*
- *All about supporting industry to support competent and qualified staff. The subcontracting supports this to ensure that all areas are supported.*
- *Brings in discussions about destinations and outcomes e.g., positive destination in another industry however this is not seen as a positive outcome.*
- *EPA being the competency is the key in the sector particularly where there is a professional qualification.*

Summary of Discussion

QAR

In some ways the AAF is a good tool but internal KPIs are more rigorous than AAF. There are no financials in the AAF and often the financials are the key driver to ensure that delivery can be maintained.

All of the accountability currently sits with the provider so the organisation stated a preference for the term 'shared responsibility' with 'responsibility' more linked to understanding what the reasons are (mainly associated with achievement and non-completion). However they feel that employers sharing the burden might not work as they may have one apprentice meaning SMEs might be turned off. Would potentially make sense for big levy payers but wouldn't work as a one size fits all.

Understanding of QAR methodology is variable across the provider's network. Most people won't have the knowledge to root around in the raw data. Known deficiencies include transfers between providers which impact negatively. Turbulence in the system also causes more delayed drag which impacts providers. This also impacts the starts figures e.g., College mergers, re-starts – big figures we

see in starts are not necessarily a reflection of the number of individuals who have started; redundancies should be an override for withdrawals for this reason.

The organisation has carried out a lot of destination reporting and monitoring, i.e. telephone surveys providing rich data in relation to withdrawals. It suggests that there could be pilot destination surveys, using a paid for service to gather the data.

In terms of forecasting QAR targets and progress, the following points were noted:

- o They can attempt to forecast but this should be a bit easier than it currently is
- o Functional skills can have an impact
- o Barrier of the 31/07 date is an issue for forecasting when 'achievement' is out of the control of the provider
- o Completion payment rather than an achievement payment - confusion around 'completed' and 'achieved' and how the recording is managed in the ILR and therefore forecasting QAR.
- o Achievement to dictate the completion.

The provider would welcome training/support in understanding non-completion, recognising patterns to give them better data.

AAF

The organisation is a keen user of the tool but feels it is very 'funding and accountability based' and doesn't lend itself to a good understanding of avoiding non-completion – they see it as a RAG rating tool rather than a tool to provide key insights. They feel it forces providers to work to avoid dropping into the red zone taking the point away from delivering a quality apprenticeship programme. They would question whether the 'one size fits all' approach works and whether more granularity i.e. breadth of cohort can be provided and whether types of employers could be taken into account i.e. SMEs often see more leavers.

The organisation has a live dashboard to manage overall data and knows when things might turn 'red'. However, other providers might not have the resources to develop this and therefore just use the overarching overview from the AAF. Some providers, where apprenticeships are a small part of their provision, might not fully understand the AAF and just see it as a RAG rating tool rather than a tool manage their programmes effectively.

When asked whether real time data, as opposed to older data, can aid management of business and decisions, the organisation felt that it would depend on how current the data was. They have a system that updates from the ILR which 're-creates' the AAF as well as funding information to track performance but they question whether providers not in this position would want to wait for DfE to update this.

Regarding other performance measures that need to be added to give a truer picture of provision, they feel that potentially the timing of the withdrawal and maybe linking achievement to cohort sizes or proportionality of high/low performing areas would be useful. It would be interesting to track and assess 'year of withdrawal/time of withdrawal' on longer programmes. This provider's statistics show that withdrawal rates in year 1 of programmes is higher than any other year on the 4 year standard therefore this could this be linked to employers sharing responsibility.

ILR

In terms of better, and more automatic ways, to capture progression data, and transfers to ensure less risk to the provider, the organisation suggested using ILR data for this to confirm whether the learner is still 'in learning'.

Employer Support/Recruitment

Since 2018 the number of electricians has dropped by 25%. This could be explained as a result of a number of factors, including Brexit, ageing workforce, SMEs not being able to commit to 4 years, issues about return on training investment, and others. There is a need to make it easier for employers to take on an apprentice, 'something that gives employers something back' particularly for SMEs, who might struggle to see something 4 years ahead - for example, tax break incentives which would not dimmish the appetite. The sector is already sold on the benefits of apprenticeships but it's the business reality of being able to create the opportunity in the first place.

There are currently more candidates than employers, so we need to make sure they have enough range for the apprentice to complete the standard and wages to support a slightly higher pay scale as there tends to be more 'churn for employers' who pay a lower wage. Employers often choose their own rules due to lack of industry standardisation – they are the ones creating the opportunities but they might not always be the best person to make the judgement on whether [the learner] can complete the apprenticeship.

Apprentice Feedback

The organisation has carried out some pilot studies with internal or external providers to do follow up surveys and destinations but don't want to create a whole industry as it's often easier to get larger employers to support the surveys. They would also question what the information is used for by DfE and others.

Overall Summary:

Provider 4 highlights that while the AAF is seen as a useful tool, the provider relies more on rigorous internal KPIs and highlights the need for shared responsibility in apprenticeships, though this may not suit SMEs. Understanding of QAR varies across teams, and forecasting is complicated by rigid deadlines, ILR recording confusion, and factors like Functional Skills. The provider suggests more support for analysing non-completions and advocates for real-time or more current data to improve decision-making. They also recommend capturing richer progression and destination data, such as through pilot surveys. Structural challenges like inconsistent QAR impacts from transfers and system turbulence (e.g., college mergers) add risk. Employers, particularly SMEs, struggle with the long-term commitment required, and incentives such as tax breaks could help. The provider stresses the need for a more nuanced AAF that reflects employer types and programme length, with particular attention to early withdrawals. Better alignment of ILR data to track learner progression and clearer performance indicators are also suggested. Finally, they call for transparency in how apprentice feedback data is used and recommend more targeted, meaningful follow-ups.

Part E - Additional Supporting Evidence

Although not carried out as a specific case study, some further information was submitted to us by two providers.

Provider 5 – Nationally based ITP *(AELP membership categories vary depending on region)*

Summary of Information Submitted:

Limitations of QAR as a Metric

- Overly Simplistic: QAR is a blunt, one-size-fits-all metric that doesn't account for the diversity across over 700 apprenticeship standards and sectors from Levels 2–7.
- Opaque Calculation: Even experienced education professionals struggle to fully understand how it's calculated.
- Narrow Definition of Success: Only full completion of EPA (End-Point Assessment) is counted. Other achievements (e.g. gaining a qualification, promotion, skill development) are ignored.

Misalignment with Stakeholder Interests

- Employers' Focus: Employers value exam pass rates and skills development more than QAR, many are unaware of it entirely.
- Learner Success Not Recognised: Career advancements or personal growth unrelated to EPA completion aren't captured.

Inconsistent and Unfair Targeting

- Single National Target (67%): Doesn't consider difficulty, level, or duration of different programmes.
- Professional Qualification Variance: Some apprenticeships (e.g., accountancy with ICAEW/ACCA exams) face globally low pass rates that skew QAR.
- Duration Impact: Longer programmes are more susceptible to life changes that affect completion rates.

Unbalanced Accountability

- Burden on Providers: Providers bear full accountability, while employers, EPAOs, and learners often escape scrutiny.
- External Factors: Life events (career change, family, travel), job market dynamics, and employer actions significantly affect QAR, yet are out of provider control.

Structural and Operational Challenges

- 'Positive Withdrawals': Many learners leave for legitimate, beneficial reasons i.e. promotion, sector change, better job but are still recorded as failures.
- EPA Scheduling Limitations: Restricted exam windows and re-sit rules can unfairly penalise learners and providers.
- Resource Drain: Tracking non-completers diverts staff and resources from active learners, with no additional funding.

Risk of Unintended Consequences

- Learner Selection Bias: Providers may avoid admitting learners with non-traditional backgrounds to protect QAR, undermining apprenticeship diversity and social mobility goals.
- Impact of EPA Reform: If more stakeholders (e.g. providers, employers) are involved in EPA, this could change QAR expectations and outcomes.

Overall Summary:

QAR is widely seen as an overly simplistic and opaque metric that fails to reflect the diversity and complexity of apprenticeships across sectors and levels. It only counts full EPA completion, ignoring other meaningful learner outcomes like qualifications, promotions, or skills gained. Employers are largely unaware of QAR and instead value skills development and exam success, while learners' progress is often not recognised unless fully completed. The single national target doesn't account for programme difficulty or length, disadvantaging those in longer or more rigorous apprenticeships. Accountability falls solely on providers, despite many influencing factors, like life changes, job moves, or employer decisions being outside their control. Structural issues like restrictive EPA scheduling and resource-intensive withdrawal tracking further burden providers. Additionally, QAR may incentivise risk-averse behaviour, discouraging providers from admitting diverse learners and potentially undermining social mobility goals. Reform of EPA could reshape how QAR is used and understood

Provider 6 – ITP based in East of England *(AELP membership category 501-1000 learners)*

This provider kindly provided an insight into their withdrawal data taking account of 154 starts between July 2021 and June 2024, based on apprenticeships across 15 standards (Level 2 – 53, Level 3 – 74, Level 4+ 14), all of which are noted with a provider end code of 'Non Achiever – Left Programme Early'.

Of the 154 learners, 141 (92%) were coded on the ILR as 97 – Other. Of these 141 learners, destination data shows that the reasons for leaving were:

Reason	Number of learners
Left employer	79
Nothing further known – no contact	25
Left employer for a change of career	18
Ill health, stress, anxiety etc.	5
Not taking EPA	3
Progressed to another level programme	3
Changed mind	3
Gone to another education programme	2
Dismissed	1
Made redundant	1
Non-starter	1

Summary

Provider 6 data shows that 92% of their withdrawals are coded as 97 therefore this does not adequately identify the reasons, many of which could sit outside of the provider's control and doesn't highlight whether the learner moved to another employer and, as such, a positive destination. This also reflects feedback from provider 3 where it is stated that "the leaver reason is quite a restrictive ILR field and 97 code personal reasons is so broad".

Stakeholder Research

On 20 May an article regarding research published in FE Week by Aptem, an AELP associate member was noted. The research correlated with a lot of our own findings, particularly the use of code 97 – other.

"When a learner withdraws from an apprenticeship, there is a Department for Education requirement to capture within the ILR the reason from a set of limited categories. Although training providers may be aware of the reason, the most commonly used category is "other" followed by "other personal reasons", which between them account for almost 90 per cent of withdrawals and does not tell us much at all"

The withdrawal data used during Aptem's research found that:

"Overall 72.4% of withdrawals were described as 'Other', followed by 16.1% as 'Other personal reasons'. A small percentage have transferred to another provider (2.7%) and 2.6% left due to injury or illness, although this group is likely to be much larger whilst categorised under 'Other personal reasons'".

Table 1:

ESFA Code	count	%	Description
97	25487	72.4	Other
44	5668	16.1	Other personal reasons
2	939	2.7	Learner has transferred to another provider
3	918	2.6	Learner injury / illness

Their data also shows correlation to our research where providers are penalised for withdrawals that are not within their control:

"Overall 33% of withdrawals were employment status related where the learners employment was either terminated, made redundant, resigned or promoted to a new role not suitable for their apprenticeship programme.

A further 15% of apprentices were withdrawn due to a lack of commitment or engagement, poor attendance or simply no longer wanting to continue with their apprenticeship."

Also highlighted during their analysis of withdrawal reasons by age:

*"Younger apprentices (aged below 25) are more likely to be completing level 2 and level 3 courses. **The youngest group (aged 16-18 years old) were more likely to withdraw due to employment status related reasons (47%) compared to any other group**. The most common employment-related reason was due to a change of employer, particularly among the youngest group, but this group also had a much higher termination rate (7.5%) compared to older apprentices.*

Only 6% of the youngest age group gave "personal reasons" for leaving their apprenticeship programme. Older learners are significantly more likely to withdraw as a result of personal reasons or commitment and engagement factors. Compared to younger learners those aged over 35 were almost twice as likely to withdraw as a result of health-related factors"

Part F- Overall case study/additional evidence summary

Below is a summary of some positives, identified by providers during the case study discussions, grouped into themed areas:

POSITIVES IDENTIFIED IN THE CURRENT APPRENTICESHIP ACCOUNTABILITY AND QAR SYSTEM

1 **Effective Provider Strategies**

Early retention strategies (e.g. 120-day monitoring, OTJT tracking, transparent employer communication) have led to improved QAR outcomes.

Linking QAR data to Quality Improvement Plans (QIPs) has been effective, especially for benchmarking distinction rates.

2 **Usefulness of the Apprenticeship Accountability Framework (AAF)**

AAF is seen as a useful tool, particularly when used alongside internal KPIs.

Suggestion for AAF to act as a 'temperature check' rather than a strict performance measure reflects positive intent in its design.

3 **Value of Learner and Employer Feedback**

Midway apprentice feedback is highlighted as valuable for timely intervention

Gateway feedback from apprentices and employers could enhance transparency and help inform learner choice.

Feedback is recognised as a valuable data source, with calls for more targeted follow-ups.

4 **OTJT as a Risk Indicator**

OTJT data, despite its challenges, is recognised as a key early risk indicator.

5 **Positive Outcomes Recognition**

Positive withdrawals (e.g., transfers or progress) are acknowledged as meaningful and useful outcomes if validated.

6 **Calls for Reform Indicate Value in Frameworks**

Providers see potential value in the QAR and AAF frameworks, not in their current form, but as tools that could be improved to be more accurate, flexible, and fair.

NEGATIVES IDENTIFIED IN THE CURRENT APPRENTICESHIP ACCOUNTABILITY AND QAR SYSTEM

1 Limitations of QAR:

QAR is perceived as overly simplistic and opaque.

It fails to account for programme difficulty, learner diversity, and partial but meaningful outcomes.

The 10-month data delay limits its usefulness for responsive planning.

Employers are largely unaware of QAR and focus more on retention and skill development.

2 Off-The-Job Training (OTJT) Challenges

OTJT is confusing and inconsistently applied across providers.

It excludes relevant learning activities like revision and mock exams.

Learners and employers struggle to understand OTJT requirements.

3 Data and Framework Inconsistencies

Rigid timelines and misalignment between ILR, AAF, and QAR cause confusion.

Current ILR codes, especially code 97, are too broad and obscure real withdrawal reasons.

Inconsistent data systems hinder accurate learner tracking and destination mapping.

4 Structural and Systemic Barriers

Providers bear full accountability despite many factors being beyond their control.

Restrictive EPA scheduling and FSQ requirements hinder learner progression, especially for 16–18s.

SMEs face challenges in maintaining long-term apprenticeship commitments.

Systemic issues may discourage inclusion and undermine social mobility.

5 Feedback and Engagement Gaps

Apprentice and employer feedback is inconsistently collected and used.

There is limited transparency on how feedback data informs decision-making.

6 Planning and Decision-Making Constraints

Long data delays and funding uncertainties hinder strategic planning.

Internal understanding of QAR is limited across provider teams.

PROVIDER RECOMMENDATIONS FOR THE APPRENTICESHIP ACCOUNTABILITY AND QAR SYSTEM

1 Limitations of QAR:

Reframe QAR as a value-for-money metric.

Provide quarterly QAR data updates.

Include positive outcomes like transfers, qualifications, and promotions in QAR.

Differentiate QAR metrics by programme type and length.

2 Off-The-Job Training (OTJT) Challenges

Rebrand and centralise OTJT guidance.

Allow flexibility for delivery formats and recognise broader learning activities.

Expand definitions to include maths and English and other support activities.

3 Data and Framework Inconsistencies

Align QAR timelines with the R14 hard close instead of July 31.

Improve ILR coding granularity to reflect positive destinations and real causes of withdrawal.

Standardise data across frameworks and ensure system interoperability.

4 Structural and Systemic Barriers

Reform EPA scheduling for greater flexibility.

Introduce tax incentives or other supports for SMEs.

Recognise and accommodate external factors in accountability frameworks.

5 Feedback and Engagement Gaps

Make feedback collection at gateway and mid-point mandatory.

Link feedback to public provider profiles to aid learner and employer choice.

Improve transparency and follow-up on feedback findings.

6 Planning and Decision-Making Constraints

Provide real-time or more current data feeds.

Offer training for staff on interpreting QAR and using it for improvement planning.

CONCLUSION

In conclusion, current QAR and AAF systems **require reform** to better align with the evolving landscape of modern apprenticeships. A more flexible, data-driven, and sector-specific approach is essential to effectively support all stakeholders, including providers, employers, and learners. Clearer guidance, enhanced collaboration in assessment design, stronger quality assurance mechanisms, and a rebalanced focus on quality and completion over numerical targets are key. Addressing systemic issues such as delayed assessments, reporting distortions, and off-the-job training complexities will be crucial to building a more accurate, fair, and sustainable apprenticeship model.

Our survey roundtable activities found that the current QAR and AAF systems do not fully reflect the complexity of modern apprenticeships. Providers call for a more **flexible, timely, and transparent framework** that supports meaningful outcomes beyond EPA completion.

There is a need to **reform EPA processes** with clearer roles for providers, employers, and EPAOs, along with stronger quality assurance. Providers support **greater employer accountability**, focused on **quality and retention**, using **incentives** and **public feedback** rather than penalties.

Systemic issues like **EPA delays, rigid functional skills rules**, and **unclear data frameworks** must be addressed. More holistic success measures, like a **'distance travelled' model**, and streamlined OTJT tracking would better reflect learner progress and provider impact.

Provider case studies highlighted, across all providers, a clear consensus that the current QAR system is too narrow, overly delayed, and does not reflect the true complexity or quality of apprenticeship outcomes. Key challenges include rigid timelines, outdated metrics like OTJT, inconsistent ILR coding, and a lack of recognition for positive learner progression or transfers. Providers advocate for more real-time, nuanced, and value-driven measures, such as reframing QAR as a value-for-money metric, improving ILR accuracy, reforming EPA timelines, and making feedback from apprentices and employers more transparent and actionable. Greater flexibility, system alignment, and shared accountability, especially with employers, are seen as essential to improving outcomes and ensuring fairness.

All of the above feedback has been taken into account to enable AELP to provide the Department for Education with some clear feedback and recommendations that could be implemented to improve and enhance the current system.

Appendix 1 – Sector Survey - Questions

1) In the last 12 months (or chose full year 2023/24 if preferred), roughly what % of your learners did not complete their apprenticeship?

2) Of those, what % of these learners progressed into a positive destination?

   - Full-time job with the same employer

   - New job with a different employer

   - Self-employment/starting a business

   - Moved into Further or Higher Education

   - Other (please specify)

3) What are the main barriers to achievement/completion (tick all that apply)

   - End Point Assessment (EPA)

   - Obtain professional certification prior to EPA

   - Employer actions (i.e. redundancy, changing priorities)

   - Breaks in learning

   - Transfers

   - Wider recent policy decisions (i.e. changes to NICs)

   - Changes in the apprentice's circumstances

4) Do you think a more simplified End Point Assessment (EPA) process will positively or negatively impact on QAR moving forward? (yes/no/don't know) (option to provide more details)

5) Do you think the new flexibilities on Functional Skills Qualifications (FSQs) for adults will help improve achievement/completion and reduce withdrawals (yes/no/don't know) (option to provide more details)

6) Do you have any suggestions for additional ILR coding that will positively impact on a) withdrawals, b) transfers, c) breaks in learning (open text for each category)

7) Do you have any thoughts on the relationship between the withdrawal reason and the timing of the withdrawal (open text)

8) Do you think that having to provide a more detailed reasons with some evidence (in the evidence pack) for non-completions would a) add unnecessary burden or b) be something you would support? (open text to provide more details)

9) Do you think there should be more employer accountability and to what extent? How do you think this could be better captured? (open text)

10) How do you see the proposed Ofsted changes impacting on your Apprenticeship Accountability Framework and any subsequent intervention? (Open text)

11) Sectors currently delivering (list)

12) Geographical locations of delivery (list)

Appendix 2 – Case Study Questions

Conversations were based on, but not limited to, the following questions:

Quality:

- What does 'quality' and 'successful' apprenticeship delivery look like?
- Is the current AAF fit for purpose and 'doing what it says on the tin'? How can it be better refined?
- What measures (using data we already have, not new) would be better/stronger to provide a fair, balanced and pragmatic overview of a provider's quality of delivery?
- Is what is currently in the dashboard reliable and what else would be useful to include to give all parties the transparency on quality of provision
- Do providers/staff fully understand QAR methodology?
- What other training/support from DfE would be useful to raise staff and provider awareness/understanding/confidence of:
    - Audit
    - Compliance
    - Data
    - QAR

MIS/Data/Information

- How are providers using the information in the dashboard?
- How helpful would real time data be as opposed to older data to aid management of business and decisions? Currency and timeliness/availability of data in dashboard
- What could be done differently to improve the data/provider's experience of using the system?
- Are there any other performance measures that need to be added to give a truer picture of provision?
- Is there a better, and more automatic way, to capture progression data, transfers (between employers and providers or both) to ensure less risk to the providers? Any evidence of this?
- How can providers ensure more timely and accurate submission of data?
- How can providers better forecast QAR targets and progress

Curriculum/Business Planning

- How can the AAF dashboard drive better provider self-improvement earlier in the process?
- What considerations do you take into account when deciding on your curriculum offer, i.e. industrial strategy, progression/outcome trends
- How can we get more apprentice feedback (exit survey currently sits outside of AAF)
- What wider changes are impacting on business decisions (i.e. choosing to move away from particular sectors)?
- How do you ensure that your recruitment procedures are robust for a) learners and b) employers?
- What can DfE do with employers that would help with front line delivery?

Appendix 3 – Suggested impact/impact on QAR of recommendations 2, 3 and 4 is outlined below:

Recommendation 2 - Recognise all contribution to success, particularly where learners move between employers/providers. Allow providers to flag 'positive outcomes' with supporting data/evidence and adapt QAR metrics to improve data validation and tracking through other systems (i.e. HMRC) to evidence progression outcomes and transfers.

Recommendation 3 - Redefine QAR milestone points – publish simple, easy to access additional data sets and wider outcomes alongside QAR data i.e. gateway entry data, EPA pass rates and grading outcomes, and retention alongside achievement data (i.e. on Find and Apprenticeship).

Action	Impact	Impact on QAR (based on case studies and additional information/data received from providers)
Introducing positive destination tracking a wider set of learner outcomes. *Allowing providers to flag positive outcomes with evidence (e.g., employment via HMRC data, continuation with a new provider) would give fairer accountability.* *Potential for new QAR categories (e.g., "transferred with success", "progressed to employment") for more nuanced performance measurement. Also being able to record withdrawals that were outside of the provider's control.*	Allow measurement of positive outcomes for learners who transfer between employer/provider and ultimately achieve their apprenticeship, or move into sustained employment rather than being counted as a non-achiever. This shift would reflect a more realistic overview of the learner journey. Improved accuracy of provider performance data and reduce penalisation for factors outside provider control (e.g., employer redundancies, relocations). This would encourage collaboration between providers, rather than competition, which can discourage mid-programme transfers which results in less volatility in QAR due to learner movement.	Provider 6 – Additional Information Had this provider been able to record transfers as a positive destination, it would have resulted in 24 fewer learners being coded as 97 - other A further 80 learners were recorded as 'left employer' or 'made redundant' however this was likely outside of the provider's control.
Introduction of additional milestone points would allow QAR to reflect in-year achievement or completion.	Additional milestone points would reduce 'non-completions' when successes occur outside of the rigid in-year data up to 31 July	Provider 2 Case Study - Overall achievement rate 66.1% *"We had a further 54 learners who went through gateway before the 31/07/24 in line with their end of learning date, 33 of which achieved in August or early September before the R14*

		ILR, but they don't count as they need to have sat EPA by 31/07/24 to count. If this 33 had counted our overall achievement data would have been 68.2%"
Publishing additional data points (e.g., gateway entry, EPA pass rates, retention and progression) alongside QAR on platforms like 'Find an Apprenticeship' would provide enhanced transparency and improve learner choice.	This change empowers learners/employers with a richer view of provider quality. Also highlights quality of delivery, not just completion rates.	<u>Provider 1 – Case Study</u> *"Early monitoring/measures, OTJT reporting and transparency with employers at 6 months helped to improved achievement across the board.* They suggested the need for an *"ITP early retention indicator, relative to the programme duration, published around March time"*

Employer Responsibilities and Commitment

Recommendation 4 *- Strengthen employer responsibilities and commitment with more robust training and onboarding for new employers, with simplified data capture/transfer between providers and employers.*

Action	Impact on QAR	% possible change on overall QAR
Strengthened employer responsibilities, commitment and understanding the apprenticeship journey, expectations, and how to support learners effectively.	Fewer early withdrawals due to employer disengagement or poor induction. Learners are more likely to remain on-programme and succeed.	<u>Stakeholder Research</u> *"We found that 6.3% of learners where withdrawn due to an employer no longer supporting the apprenticeship and withdrawing or not actively providing support within the workplace. A further 4% withdrew because the course/programme was unsuitable for them or they had decided to leave for study in further or higher education"*

Simplified data capture/transfer enables cleaner handovers if learners change employers or providers.	Reduces administrative loss of data when learners transfer. Ensures continuity in the ILR and learning plans. Prevents learners from being counted as withdrawals due to missing data.	<u>Provider 6 – Additional Information</u> Had this provider been able to record transfers as a positive destination, it would have resulted in 24 less learners being coded as 97 - other
Robust onboarding ensures employers understand their role in supporting off-the-job training, gateway readiness, and EPA preparation.	Employers more actively support completion and assessment. Higher quality of learning experience and readiness for EPA.	<u>Provider 5 – Additional Supporting Evidence</u> *"The burden is on Providers: Providers bear full accountability, while employers, EPAOs, and learners often escape scrutiny.* *External Factors: Life events (career change, family, travel), job market dynamics, and employer actions significantly affect QAR, yet are out of provider control"*
Training employers to identify and report early warning signs (e.g., disengagement, personal challenges). Streamlined employer data processes ensure accurate reasons for withdrawal, transfers, or breaks in learning.	Providers can intervene earlier Targeted support prevents withdrawals and/or non-completions Prevents misclassification of outcomes due to missing info. Ensures legitimate exits (e.g., employment progression) that don't negatively affect QAR.	<u>Provider 6 – Additional Information</u> *25 learners were recorded as 'nothing further known – no contact'.* If there was more information available, or these withdrawals had been flagged earlier, the provider may have been able to provider more targeted support.