

By email: consultations@ofqual.gov.uk

27th August 2025

To whom it may concern

Regulatory framework for apprenticeship assessment

The Chartered Governance Institute is the professional body for governance and the qualifying and membership body for governance professionals across all sectors. Its purpose under Royal Charter is to lead effective governance and efficient administration of commerce, industry, and public affairs working with regulators and policymakers to champion high standards of governance and providing qualifications, training, and guidance. As a lifelong learning partner, the Institute helps governance professionals achieve their professional goals, providing recognition, community, and the voice of its membership.

One of nine divisions of the global Chartered Governance Institute, which was established 130 years ago, the Chartered Governance Institute UK & Ireland represents members working and studying in the UK and Ireland and many other countries and regions including the Caribbean, parts of Africa and the Middle East.

As the professional body that qualifies Chartered Secretaries and Chartered Governance Professionals, our members are well placed to understand the issues associated with the training and employment of apprentices in the profession. In preparing our response we have consulted, with our members. However, the views expressed in this response are not necessarily those of any individual members, nor of the companies they represent.

Our views on the questions asked in your consultation paper are set out below.

General comments

We have some concerns around the way in which the apprenticeship process seems to pay little regard to the presence in a profession of a chartered professional body such as ourselves. While we have supported the development of the Governance Officer apprenticeship, for example, it remains our view that a lot of work has been redone simply to ‘tick boxes’ rather than using the comprehensive programme already in place and that the End Point Assessment Organisations are not always, in fact, best placed to make that assessment.

On that basis, we generally support the proposals put forward in the open consultation on the regulatory framework for apprenticeship assessment but would ask that Ofqual give increased consideration to those organisations that already provide standards in the market, rather than requiring the reinvention of the wheel.

Specific questions asked in the consultation paper

We have no comment on questions 1 to 34 and 38 to 50 inclusive beyond confirming our broad support for the principles and approach proposed.

Question 35: To what extent do you agree or disagree with the proposal not to disapply

Condition E1 for apprenticeship assessments?

In summary, Condition E1 requires awarding organisations to:

- ensure that a qualification has a clear objective and meets that objective; and
- consult users of a qualification to ascertain whether there is support for the qualification.

Condition E1 was previously disappplied for apprenticeships on the basis that employers (through Trailblazer Groups) had developed the end point assessment plan within an apprenticeship standard and hence employer support for the assessment was implicit through the development and approval of an apprenticeship standard.

The changes that are to be made to apprenticeship assessment mean that employers (through Trailblazer Groups) will have much less involvement in developing the assessment for an apprenticeship. As a result, employer support will no longer be implicit within the development and approval of an apprenticeship standard.



Even within the existing detailed end point assessment framework, we have seen evidence of End Point Assessment Organisations interpreting end point assessment plans incorrectly (for example, proposing to assess knowledge of the wrong legislation and regulation, despite examples being provided within the relevant knowledge statements). One way to address such misinterpretations is through employer engagement or, perhaps more importantly, engagement with any relevant professional body.

Given the requirement for employer support of qualifications, and given the experience outlined above with an existing end point assessment plan within an apprenticeship standard, we strongly agree that Condition E1 should not be disapplied for apprenticeship assessments in future.

Question 36: Do you have any comments on the proposal to issue Ofqual guidance to support awarding organisations to engage with employers effectively when designing apprenticeship assessments? Please specify any areas you think that it would be helpful to include in the guidance.

Guidance in this area will be important to ensure a similar level and quality of engagement across different Assessment Organisations.

Assuming Trailblazer Groups will continue to be involved in the development of apprenticeship standards, they provide a ready-made employer group that can be consulted by an Assessment Organisation. Further, many careers have relevant professional or industry bodies that represent employers. This ready-made employer group is significantly underutilised at present.

As a minimum, the guidance should strongly recommend that Assessment Organisations engage with:

1. the Trailblazer Group that developed the relevant apprenticeship standard; and
2. any relevant professional or industry bodies.

Further, it would help build employer confidence in apprenticeship assessment if they could understand the engagement that has taken place in developing the assessment for a particular apprenticeship standard. The guidance should recommend that this information is made publicly available.



Question 37: Do you have any further comments on the proposals contained in this section?

As noted in our answer to question 35 above, even within the existing end point assessment framework we have seen evidence of End Point Assessment Organisations interpreting detailed end point assessment plans incorrectly. This is partly a result of the fact that End Point Assessment Organisations are able to develop their end point assessment approach without any further interaction with the Trailblazer Group, employers or their representatives.

This is a cause for significant concern because it risks employers losing confidence in the qualification if they are concerned the wrong knowledge, skills and behaviours are being assessed. Moreover, where a professional body such as ourselves has agreed to recognise the apprenticeship in some way, this recognition is jeopardised if there are concerns about whether the right knowledge, skills and behaviours are being assessed.

There is an opportunity to address this weakness through:

- the removal of the disapplication of Condition E1 (see question 35); and
- guidance that sets out clear recommendations about how employer engagement should take place (see question 36).

If you would like to discuss any of the above comments in further detail, please do feel free to contact me.

Yours faithfully,

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