

GMLPN End Point Assessment (EPA) Feedback Paper

Introduction

The Greater Manchester Learning Provider Network ([GMLPN](#)) is a network of over 100 Independent Training Providers, Colleges, Universities and Careers Organisations. We work alongside key partners including; Greater Manchester Combined Authority, Job Centre Plus, Greater Manchester Chamber of Commerce, Greater Manchester Colleges Group and Local Authorities to achieve closer alignment between the needs of employers, individuals, communities and the suppliers of skills.

We have partnered with Education Charity and Awarding Organisation NCFE to pilot the Supporting Autistic Individuals into Apprenticeships project which seeks to equip autistic individuals with technical and employability skills to progress into Apprenticeships or other destinations e.g. traineeships, full time education and employment. More information on this project will follow in the next section.

End point assessment (EPA) has been regularly raised as a concern throughout the project in conversations and in sub-group and steering group meetings. We have asked stakeholders involved in the project to send in feedback and intelligence they have on EPA, reasonable adjustments and specifically The Institute for Apprenticeships and Technical Education's Reasonable Adjustment Matrix, as it relates to autistic individuals. This feedback paper was reviewed at the Project Steering group on the 25th January 2022 with representatives present from: Association of Colleges, Aquinas College, Digital Advantage, the Education Skills Funding Agency (ESFA), Jobcentre Plus (JCP), National Autistic Society, North Chadderton College, NCFE, NowSkills, Oldham College, OneFile and Salford City Council.

We have aggregated this feedback into a response in the form of this paper which will set out the challenges EPA presents for autistic individuals, look at the Reasonable Adjustment Matrix and present suggestions for improvement of the reasonable adjustments process.

The views represented in this paper do not claim to represent NCFE's position.

Supporting Autistic Individuals into Apprenticeships

The Supporting Autistic Individuals into Apprenticeships project aims to:

- Work with Training Providers to deliver a training and mentoring programme, which will embed both technical and employability skills to support autistic individuals to progress on to an Apprenticeship (or other best next steps)
- Inform Training Providers, Employers and Referral Agencies on how best to support autistic individuals through the development of toolkits and capacity building services
- Prove an effective model and provide an evidence base of the impact on learners and employers making the case to key stakeholders. Garnering the support of other stakeholders for the level of funding required to ensure an inclusive funding policy that enables progression for autistic learners and a return on investment

This project is pertinent as autistic individuals are already disadvantaged in terms of likelihood of employment ([ref](#)) and research on previous economic crises suggests that disadvantaged groups

become even more marginalised and further away from the labour market ([ref](#)) than before. We passionately believe that apprenticeships are a strong progression route for this cohort, but we are aware more could be done within the system to ensure inclusivity.

Throughout this project we have worked with stakeholders in the form of sub-group and steering group meetings and one to one conversations. There are three sub-groups made up of the key stakeholders involved in the project; Training Providers, Employers and Referral Agencies. The steering group that helps to oversee this project includes representatives from national organisations such as the Education Skills Funding Agency (ESFA) and Association of Colleges, Training Providers, Careers Organisations, Autism Specialists, Local Authority groups and more. These stakeholders have been key in supporting the project and providing the feedback that is detailed in this paper.

General Feedback on EPA

Respondents had some general comments and concerns about the EPA process focusing on clarity/timing and the reasonable adjustments process which will be detailed below.

Clarity & Timing

Stakeholders broadly felt that the EPA process is unclear and can often be too slow. Comments highlighted that slowness in receiving results can cause a lot of anxiety for autistic individuals who can struggle with a lack of routine ([ref](#)) and sudden change.

Many comments noted how EPA is relatively new and some people still do not understand the process. We feel it is vital that work continues to be done to build confidence and understanding in the EPA process for all, something we are aware the ESFA are working on currently including the production of EPA guides for key stakeholders.

Reasonable Adjustments

Stakeholders suggested that they would benefit from a series of webinars/training focusing on reasonable adjustments including what they are and how to make them. This training could be offered to End Point Assessment Organisations (EPAOs), training providers and employers, so that there is greater collective understanding within the system.

Additionally, comments suggested that EPAOs themselves may want to host webinars on reasonable adjustments for providers and employers laying out the process of EPA and what the EPAOs expect. Feedback from Training Providers suggests there is a lack of consistent messaging from EPAOs when it comes to reasonable adjustments within EPA. Stakeholders felt this would give providers more confidence when dealing with reasonable adjustments.

Another suggestion was that if the Independent End Point Assessor could speak to the autistic individual and their skills tutor before EPA takes place as autistic individuals often feel anxious when meeting new people for the first time ([ref](#)). This meeting could be used to explain the reasonable

adjustments that are being made for the individual so that they can familiarise themselves with what will be happening during their EPA.

One comment suggested that the reasonable adjustment process is not always fair in that sometimes decision has been made for adjustments to be applied in one circumstance but not another even though the need has been the same. In this case, the stakeholder was left confused by the process and did not receive an adequate explanation from the EPAO for the decision.

Finally, stakeholders were concerned that EPAOs may not recognise that specialists on special educational needs and disabilities may not be experts on the needs of specific students and the challenges that they face. Therefore, it is important that any system is open to change in order to be as inclusive as possible.

Feedback on The Institute's Reasonable Adjustment Matrix

In order to tackle some of the confusion and concerns surrounding the reasonable adjustments, The Institute for Apprenticeships and Technical Education have developed a Reasonable Adjustment Matrix ([ref](#)) which aims to 'help support EPAOs in making appropriate and consistent judgements and provide a valid, reliable and manageable approach to supporting apprentices' ([ref](#)).

GMLPN welcome the extra support the Matrix provides for EPAOs, however feedback we have gathered suggests that the Matrix is insufficient as it currently stands for a number of key reasons detailed below.

Communication

Most feedback gathered by GMLPN highlighted that the Matrix does not have a clear and sufficient focus on communication, which is particularly concerning as this one of the central challenges autistic individuals face ([ref](#)) and reasonable adjustments could easily be made to alleviate this challenge.

For example, autistic individuals may benefit from having a personal support worker in attendance as having a familiar face around may help to reduce anxiety ([ref](#)). It was also noted that allowing individuals to take bathroom breaks may help to reduce feelings of anxiety, which is a common issue for autistic individuals ([ref](#)), and may be beneficial for everyone taking EPA and suffering from anxiety not just autistic individuals.

Respondents suggested that autistic individuals may respond best to clear and simple instructions ([ref](#)) or may benefit from receiving a set of written questions rather than verbal questions. Stakeholders hoped that this communication element would be picked up throughout EPA in observations and professional discussions, but this is not clearly marked out in the Matrix.

Additionally, some autistic individuals may have problems with written communication ([ref](#)) and for those individuals it may be reasonable to allow them to provide verbal (or perhaps pre-recorded) answers or demonstrations of their knowledge instead e.g. conducting practical tasks. Feedback highlighted how memory/processing can be a challenge for this cohort ([ref](#)) and allowing individuals to bring in notes and prompts might help them to better demonstrate their knowledge.

Understanding of Autism

Additionally, respondents were concerned with the presentation of autism in the Matrix as a social/communication need, when in fact autism is far more complicated and autistic individuals can face challenges with cognitive processing ([ref](#)), sensory issues ([ref](#)) and more. It is vital that any reasonable adjustment Matrix has a robust understanding of any conditions it aims to include.

It is necessary to point out that autism is a very wide and varied condition ([ref](#)) and any two autistic individuals can face entirely different challenges. Because of this, stakeholders suggested that The Institute may wish to liaise with autistic individuals/specialists on autism in order to better understand the challenges this cohort faces.

Finally, some comments suggested that the concept of a Reasonable Adjustment Matrix may be intrinsically flawed, as the needs of those taking EPA can often go above and beyond the restrictive categories of the Matrix. Therefore, it is vital that the Matrix is not a 'final answer' on reasonable adjustments and can be open to change, criticism and suggestion.

Conclusions

Given the statistics about the autism employment gap, it is clear that autistic individuals need extra support to access employment and apprenticeships are a clear and effective model for supporting these individuals to succeed. However, more can be done to make the apprenticeship system more inclusive and accessible for autistic individuals.

We broadly welcome The Institute for Apprenticeships and Technical Education work on developing a Reasonable Adjustment Matrix. However, we are concerned that the Matrix does not focus enough on the communication needs of autistic individuals.

EPA can be a confusing and challenging time for all, and this is compounded for autistic individuals. Feedback we received highlighted how the EPA process needs to be streamlined so that learners are not confused about what the process entails and are Training Providers are working closely with the individual and EPAOs to ensure the individual can access timely and fair reasonable adjustments.

Recommendations on EPA from respondents included:

- Training/Webinars to be developed for providers, employers and EPAOs on reasonable adjustments to help dispel some of the confusion about the process
- Additional Reasonable Adjustments for Autistic Individuals for EPA:
 - Giving timely responses to reasonable adjustment requests
 - Letting individuals take bathroom breaks
 - Permitting individuals to give verbal responses rather than written responses to questions
 - Allowing individuals to take in notes to assessments
 - Personal support workers to attend EPA to help individuals with their anxiety
 - Independent End Point Assessors/ EPAOs to meet with individuals in advance to help take away uncertainty about the process

Stakeholders felt that The Institute for Apprenticeships and Technical Education's Matrix did not properly represent the varied range of challenges that autistic individuals may face. The Institute could consider seeking input from experts on autism to help bolster the credibility and usefulness of the Matrix. This is something that GMLPN could support and facilitate through the project.

In closing, we would like to highlight that many of the issues and suggestions raised within this paper affect people regardless of whether they are autistic or not. Feedback we have received has consistently highlighted that getting reasonable adjustments right is a benefit for everyone going through the EPA process. We feel that more could be done to make the process as clear, coherent and inclusive as possible.