Apprenticeship English and mathematics flexibilities for learners with learning difficulties and disabilities: pilot evaluation

Research report

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Contents

This research report was written before the new UK Government took office on 5 July 2024. As a result, the content may not reflect current Government policy.

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Acknowledgements

List of abbreviations

ADHD – Attention Deficit Hyperactivity Disorder

ALS – Additional Learning Support

CAMHS – Child and Adolescent Mental Health Services

CGR – CooperGibson Research

DfE – Department for Education

EAL – English as an Additional Language

EHCP – Education, health and care plan

EOI – Expression of Interest

GDPR – General Data Protection Regulation

GCSE – General Certificate of Secondary Education

JCQ – Joint Council for Qualifications

LDD – Learning Difficulty and/or Disability

RAG – Red, Amber, Green

SEMH – Social, emotional and mental health

SEND – Special Educational Needs and Disability

SENCO – Special Educational Needs Coordinator

Executive Summary

The [Maynard Review](#) (2016) recommended that the minimum standard of English and mathematics for apprentices be reduced from Level 2 to Entry Level 3 for a defined group of apprentices with learning difficulties and/or disabilities (LDD) who are otherwise able to meet the occupational standard but struggle to achieve the standard English and mathematics qualifications. Current arrangements are that such flexibilities can apply only to learners who have an education, health and care plan (EHCP).

An expression of interest was sent out to providers in March 2023 inviting them to trial methods of assessment to evaluate eligibility for the English and mathematics flexibilities (beyond the requirement of EHCPs). Twenty providers were selected (with a projection of over 500 learners) to begin a 12-month Pilot that started in May 2023. These were a mixture of colleges, independent training providers and employer-providers.

Aims and approach

This evaluation of the Pilot explored the types of evidence that could be used to evaluate eligibility for the English and mathematics flexibilities, how they were implemented, what worked well or less well, the experiences of providers and learners, and perceptions around scaling up. The findings will be used to inform future apprenticeships policy decision making about the flexibilities.

A qualitative approach was taken, involving in-depth interviews with 17 apprenticeship providers engaged in the Pilot and 19 learners who had used the flexibilities.[1]

Assessing eligibility

Providers were clear about the importance of making the right decision so that those who genuinely needed the flexibilities were able to use them. In some cases, providers referred to instances where they had not offered the flexibilities due to factors such as learners having gaps in learning rather than a LDD or achieving too high a standardised score in diagnostic tests.

Providers typically combined several approaches to gain evidence of learner eligibility. This emphasised the importance of triangulation of evidence sources which, alongside staff expertise and prior experience of applying processes used, helped give providers confidence in their decisions. Often starting with a learner's self-declaration and moving

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[1] At the time of the research, 3 providers had not engaged with the Pilot and so were not interviewed. Another 5 had not used the flexibilities but were interviewed to explore their perceptions of the policy.

through previous sources of evidence to those administered by providers, evidence sources from which providers selected comprised:

- Learners' self-declaration of a LDD.

- Provider discussions or interviews with a learner to gain an understanding of their experiences that could help identify a LDD.

- Evidence of prior learning, such as, qualifications.

- Evidence of prior support, such as, through examination access arrangements.

- Prior diagnoses, for example, medical reports of a LDD.

- Provider-administered initial functional skills assessments.

- Provider-administered cognitive assessments/LDD diagnostics.

- Provider observations of learners' current ways of working, such as their use of mathematical strategies.

- Other sources of evidence, such as discussions with a learner's parents.

A few providers weighted their decision-making on either prior diagnoses or use of specific LDD diagnostic tests which they felt gave reliable standardised scores. Beyond these, providers considered that each type could hold value in assessing eligibility. However, those most commonly referred to in terms of value were:

- Cognitive assessments/LDD diagnostics.

- Initial functional skills assessments.

- Ways of working reports – observational assessments of learners' strategies in functional skills work, typically written by provider tutors.

- Discussion with the learner/learner self-declaration.

The majority of providers said they applied a consistent approach to collecting evidence from learners. However, some said that flexibility might be appropriate, such as tailoring of cognitive diagnostics to learner need.

Most learners thought that the approaches taken by providers to find out about their LDD were not particularly burdensome. In the few cases where learners did experience difficulties, these mostly related to accessing previous documentary evidence of their LDD and completing assessments. In the latter case, individual examples centred on

either finding the functional skills test challenging or accessibility issues with computer-based assessments.

A few providers said they had made some improvements to approaches that were in place at the start of the Pilot, like improving processes for collecting evidence from learners. Some providers commented how evidence collection was not necessarily burdensome compared to usual learner assessment. Where evidence collection was considered burdensome by providers, this was mostly due to the time needed to arrange and conduct assessments. This aligned with views on having sufficient time within the 8-week window[2] to mitigate the risk of an eligible learner not being identified. While some saw the 8-week window as achievable, if in a few cases pressured, some viewed it as challenging or potentially problematic.

At the time of the interviews[3], 5 of the 17 providers had not yet recruited learners to the Pilot. Where providers identified successes in recruiting learners these largely focused on promotion of the Pilot or the use of internal processes to identify potential learners, such as analysing applicant learner grades. Reasons for lower-than-expected recruitment included the level of qualifications achieved by learners ruling out eligibility, employers not having apprenticeship jobs available and provider difficulties processing the applications.

Reducing barriers for learners

Overall, providers considered that Entry Level 3 was appropriate for learners and the apprenticeships for which they were applying. They felt strongly that the flexibilities would reduce barriers for learners, for example, by:

- Making apprenticeships inclusive and attainable for learners with a LDD.

- Redressing potential inequality between flexibilities offered to learners in receipt of an EHCP, and learners without one who may have an undiagnosed LDD.

Providers were similarly unequivocal that the flexibilities would lead to a better apprenticeship experience due to:

- Removal of the pressure and anxiety to achieve English and mathematics at a higher level.

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[2] The current process for identification of an apprentice's learning needs is set out in the Apprenticeships Funding Rules and states that this judgement must be made within 8 weeks of an apprentice beginning their apprenticeship. The same timeframe has been used for the Pilot.
[3] Interviews were conducted in November and December 2023, half-way through the year-long Pilot.

- The opportunity of employment with its benefits of earning and fulfilling a desired occupation that is productive.

- Improved self-esteem due, for example, to not being adversely affected by multiple examination failures.

Overall, providers viewed the Pilot to be suitable for learners with different LDDs. They referred to how they had drawn on learners' evidence to plan delivery and support for them, primarily in using cognitive assessment and functional skills assessment outcomes.

The flexibilities had attracted a few learners but most were not aware of it when applying. Several were unsure about the functional skills requirements for their apprenticeship when applying.

Overall, learners said that they were satisfied with their apprenticeship experience to date. Key indicators of this related to:

- The majority of learners feeling confident about passing their apprenticeship as the flexibilities would make this easier.

- Most learners that had started English and/or mathematics studies reporting progress.

- The majority of learners feeling well-supported, for example, by tutors.

Providers similarly commented on learners' progress in functional skills as well as, for example, their confidence and engagement with learning.

Scaling up the Pilot

Providers strongly indicated that the Pilot should progress to become policy, based on the reasons stated above relating to reducing barriers for learning. Some also referred to previous learners that would have benefited from such flexibilities.

Providers identified a series of scaling considerations should the Pilot result in a change in practice. These included organisational level challenges such as staffing demands, training and funding, to ensure adequate capacity and capability to manage the assessment process. Most providers gave a preference for a consistent approach to collecting evidence to mitigate against risks, such as, inequality in application of the flexibilities across providers. Implications of this included:

- Providing guidance, such as a very clear funding rules flow chart which sets out acceptable evidence for LDD identification and assessing eligibility.

- Ensuring equality of evidence collection and eligibility decision-making.

- Manageability for providers so that evidence collection and administration is straightforward rather than burdensome or too costly.

- Provider size and ability to administer more specialised assessments, such as standardised tests for memory and processing speed.

- Sharing good practice recommendations in some form.

- Monitoring so that application of the flexibilities was not abused.

Conclusion

Overall, both providers and learners considered the Pilot had been a positive experience to date. Providers were confident that the approaches they took to collect and assess evidence to apply the flexibilities were suitably robust with triangulation of approaches a key reason for this, alongside staff experience and expertise. Some challenges in processes were noted, relating mostly to the time taken for collection and assessment. Overall, learners did not find approaches taken by providers to collect evidence from them to be particularly burdensome.

For learners with LDD, participation in the Pilot offered an opportunity to gain an apprenticeship in which they were occupationally competent through reducing qualification requirements and the anxiety that could be experienced in trying to achieve these. Providers were consequently strongly supportive of its intentions and potential to become policy, considering it more inclusive and appropriate.

Providers were clear that, if taken forward, communications about requirements, systems and processes need to be clear and robust. This would ensure that only those learners who should receive the flexibilities did so. It would also protect the integrity of the flexibilities and ensure consistency and equality in evidence assessment and decision-making.

Introduction

English and mathematics qualifications are an important requirement of the apprenticeship programme, given their role in supporting longer-term career prospects. English and/or mathematics must be provided for all apprentices where they do not have prior attainment in these subjects at Level 2.

English and mathematics flexibilities were introduced for some apprentices following the [Maynard Review](#) in 2016, which explored access to apprenticeships for those with learning difficulties and/or disabilities (LDD).

The review recommended that the minimum standard of English and mathematics be reduced from Level 2 to Entry Level 3 for a defined group of apprentices with LDD who are otherwise able to meet the occupational standard but struggle to achieve the standard English and mathematics qualifications. The flexibilities to the standard requirements allow learners to achieve their apprenticeship with the reduced Entry Level 3 English and/or mathematics when they meet certain conditions:

- The apprentice has an existing or previously issued education, health and care plan (EHCP)[4].

- The provider and employer expect the apprentice to achieve all other aspects of the apprenticeship requirements (including occupational competency and achieving Entry Level 3 in English and mathematics).

- The provider holds/has conducted an evidenced judgement demonstrating the apprentice cannot meet the standard requirements within the timeframe they are expected to complete all the occupational elements even with support, reasonable adjustments or stepping-stone qualifications.

There is very limited evidence in this area, but the current assessment is that too few apprentices with LDD benefit from the existing support offer, including English and mathematics flexibilities.

Stakeholders have shared particular concerns about the use of EHCPs to access the flexibilities, citing issues such as variations between local authorities in how EHCPs are awarded and that EHCPs were not intended to act as a gateway to government programmes. There were also concerns that older apprentices without an EHCP, or earlier equivalents, could be disadvantaged. Other concerns centred on the capacity and

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[4] An education, health and care (EHC) plan is for children and young people aged up to 25 who need more support than is available through special educational needs support. EHC plans identify educational, health and social needs and set out the additional support to meet those needs. https://www.gov.uk/children-with-special-educational-needs/extra-SEN-help.

capability of providers to identify need, particularly at the start of an apprentice's programme.

To address such concerns, the Department for Education introduced a Pilot of alternative approaches to evaluating eligibility for the English and mathematics flexibilities. An expression of interest was sent out to providers in March 2023 inviting their proposals for additional methods of assessment for the flexibilities, beyond the requirement of EHCPs. Twenty providers were selected (with a projection of over 500 learners) to begin a 12-month Pilot that started in May 2023. These were a mixture of colleges, independent training providers and employer-providers. Providers were piloting a range of approaches, including: cognitive assessment tools, other skills-based assessments, evidence of prior attainment or need, provider assessment, self-declared learning difficulty, and diagnostic testing.

Aims and key research questions

The aim of this evaluation was to identify and understand more about the types of evidence that could be used to evaluate eligibility for the English and mathematics flexibilities (beyond an EHCP). The evaluation took place midway through the Pilot so that its findings could inform future policy decision making about the flexibilities.

The primary research questions for this Pilot were:

- What appropriate alternative methods were providers able to use to assess and evidence flexibility eligibility and why did they choose those methods?

- How were these methods implemented?

- What were the experiences of learners in providing the evidence?

- What worked well/less well?

- What could be improved for any future roll-out and is scaling up feasible within provider organisations?

- Was the English and mathematics requirement a barrier to learners starting an apprenticeship?

Additionally, the evaluation explored (to a lesser extent):

- Did the new flexibilities encourage learners to start an apprenticeship?

- Have learners made progress in developing their English and mathematics skills?

- How confident are learners in achieving their apprenticeship?

Methodology

The research was designed to understand the process of using different types of evidence to assess eligibility for the flexibilities. Understanding impact of the flexibilities was beyond the scope although there was lighter touch exploration of provider and learner perceptions on their progress and achieving the apprenticeships.

To understand more about the types of evidence that could be used to evaluate eligibility for the English and mathematics flexibilities, a qualitative approach was taken, involving in-depth interviews with apprenticeship providers and learners with LDD.

Virtual or telephone interviews were conducted with:

- 17 providers.[5]

- 19 learners.

The interviews took place between November and December 2023 and lasted 30 minutes (learners) to one hour (providers).

Sample

Providers

Contact details of all apprenticeship providers selected by the Department for Education (DfE) to take part in the Pilot were provided to CooperGibson Research (CGR). All 17 providers who were engaged with the Pilot participated in an in-depth qualitative interview. The range of providers interviewed included:

- 8 General Further Education Colleges, 7 private sector providers, 1 public funded provider and 1 school.

- Small to large providers (number of apprentices), across all regions and a national provider.

The number of eligible learners on the Pilot when the research took place was wide ranging, but with most providers having fewer than 10.

Interviews were conducted with senior leadership team members, apprenticeship leads, leads in Functional Skills, Special Educational Needs and Disability (SEND) or Additional

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[5] At the time of the research, 3 providers had not engaged with the Pilot and so were not interviewed. Another 5 had not used the flexibilities but were interviewed to explore their perceptions of the policy.

Learning Support (ALS), or development leads. Details of the final provider sample are provided in [Appendix 1](#). There was substantial variation in levels of take-up with 5 providers having not recruited apprentices/used the flexibilities at the time of interview[6]).

Learners

Details of all 122 learners (from the 10 providers) recruited as part of the Pilot at the time of sampling, were provided (anonymously) by DfE to CGR. CGR selected 50 of these learners based on achieving a reasonable spread of learner types and DfE provided direct contact details for the selected sample. The Apprentice sample was selected from 10 providers with learners engaged in the Pilot (at the time), ensuring a range across:

- Primary needs (moderate learning difficulty, mental health difficulty, dyslexia, dyscalculia, other medical condition, other learning difficulty)[7].

- Assessment methods (including where there are variations within a provider).

- Subject / sector areas (hairdressing, manufacturing, engineering, construction, health sector, care related, hospitality and catering, education).

- Apprentice ages (around 17 to 50 years).

- Using English and/or mathematics flexibilities (one or the other, or both with a range of levels of previous qualifications or none).

- Apprenticeship Levels (mostly L2 and 3, inclusion of some L4 and 5).

The number of learners selected per provider was broadly proportionate to the number of learners enrolled.

The final 19 learners interviewed consisted of a range of:

- Primary LDD (Moderate learning difficulties, Dyslexia and dyscalculia, other).

- Age (17-50).

- Apprenticeship Levels 2-5.

- Current English and mathematics (Entry/Level 1/GCSE).

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[6] Interviews were conducted midway through the Pilot year during November and December 2023.
[7] At the time of the interviews, dyslexia and dyscalculia were most commonly represented in the population of learners. Sampling ensured a sample across a range of LDDs were included to understand how the flexibilities applied to these learners.

- Subject area (Construction, maintenance, engineering and manufacturing, Business administration and service industries, Health and social care, Education and community support).

At least one learner per provider (with learners registered on the Pilot) was interviewed and in larger providers, 2 to 4 learners were interviewed. Details of the final learner sample are provided in Appendix 1.

Interview analysis

Interview transcripts were entered into an analysis framework structured around key topics of the interview schedules and the overarching research questions. This allowed the qualitative data to be organised into discrete topic areas, enabling comparative analysis and triangulation of provider and learner data. Once all transcripts had been entered into the framework, new topic areas and sub-topics were added to the framework representing new themes emerging. Responses were then coded into these themes, enabling researchers to establish the most and least common themes in each topic area.

Considerations when reading this report

To enable the evaluation to inform key policy decisions on the flexibilities, the research took place whilst the Pilot was midway through its 12-month period This means that some providers were relatively inexperienced at using the different approaches to assessing eligibility or that learning from applying the flexibilities was yet to take place.

The findings presented here are not intended to be representative of all apprenticeship providers but reflect the experiences of those involved in the flexibilities Pilot. It should be noted that providers were self-selecting in applying to be included in the Pilot and might not be representative of a broader population. Similarly, findings based on learner perspectives are drawn from a small sample of self-selecting learners (in that although they had provided consent to be contacted for research purposes, they decided whether to respond to the invitation to take part in the research). Statements based on the qualitative interview evidence cannot therefore, be considered to be representative of the wider learner population engaged in the Pilot or the wider apprentice pool.

Findings are based on a small sample of providers and learners. Some of these include points from very small numbers of interviewees or individuals with the purpose of providing exemplification rather than representation of the sample as a whole.

Rationale for using the evidence assessment approaches

Providers identified a number of the approaches they used to collect and assess evidence of a learner's LDD so that they could make fair and robust judgements on eligibility for the flexibilities. This included reflections on value and potential limitations of these approaches. Overall, approaches used were considered helpful in assessing learners across a range of LDDs.

Prior experience of applying the flexibilities

Overall, providers reported some limited prior experience of applying flexibilities for apprentices with EHCPs, due primarily to low numbers of learners with EHCPs applying for an apprenticeship. A few interviewees had prior experience from outside the apprenticeship provider sector, such as a school Special Educational Needs Coordinator (SENCO). In some cases, there was reference to using this prior experience to inform evidence collection processes and judgements made on eligibility. For example, a former school SENCO was able to apply their knowledge of evidence required for an EHCP to assessing eligibility of learners with diagnoses of autism or Attention Deficit and Hyperactivity Disorder (ADHD).

Approaches used – value and limitations

Providers stated the importance of making the right decision in evidence assessment approaches so that:

- Decisions were authentic and valid so that those who genuinely needed the flexibilities were able to use it.

- The apprenticeship length was sufficient for learners to achieve the level of English and mathematics required.

- They were not 'letting learners down' i.e. making a judgement that might do the learner, or an employer, a disservice.

   We need to apply our judgments absolutely knowing that we feel we've covered all of our evidence bases, otherwise we're doing learners in the future disservice and the whole Pilot a disservice. – *Provider*

One provider stated that they also made it clear to learners that the exemption was for this qualification only and access to study for future qualifications may require level 2 functional skills.

Providers typically combined several of the approaches identified below to gain evidence of learner eligibility. Each of these is explored in the sub-sections that follow, considering providers' and learners' perceptions of their value and potential limitations. In Figure 1 below, these approaches are presented in 3 categories, reflecting the importance of triangulation of evidence to inform decision-making:

- Self-declaration and discussion between the learner and provider.

- Use of previous evidence.

- Use of evidence from providers' other assessment processes (new assessments).

Figure 1: Components of eligibility assessments
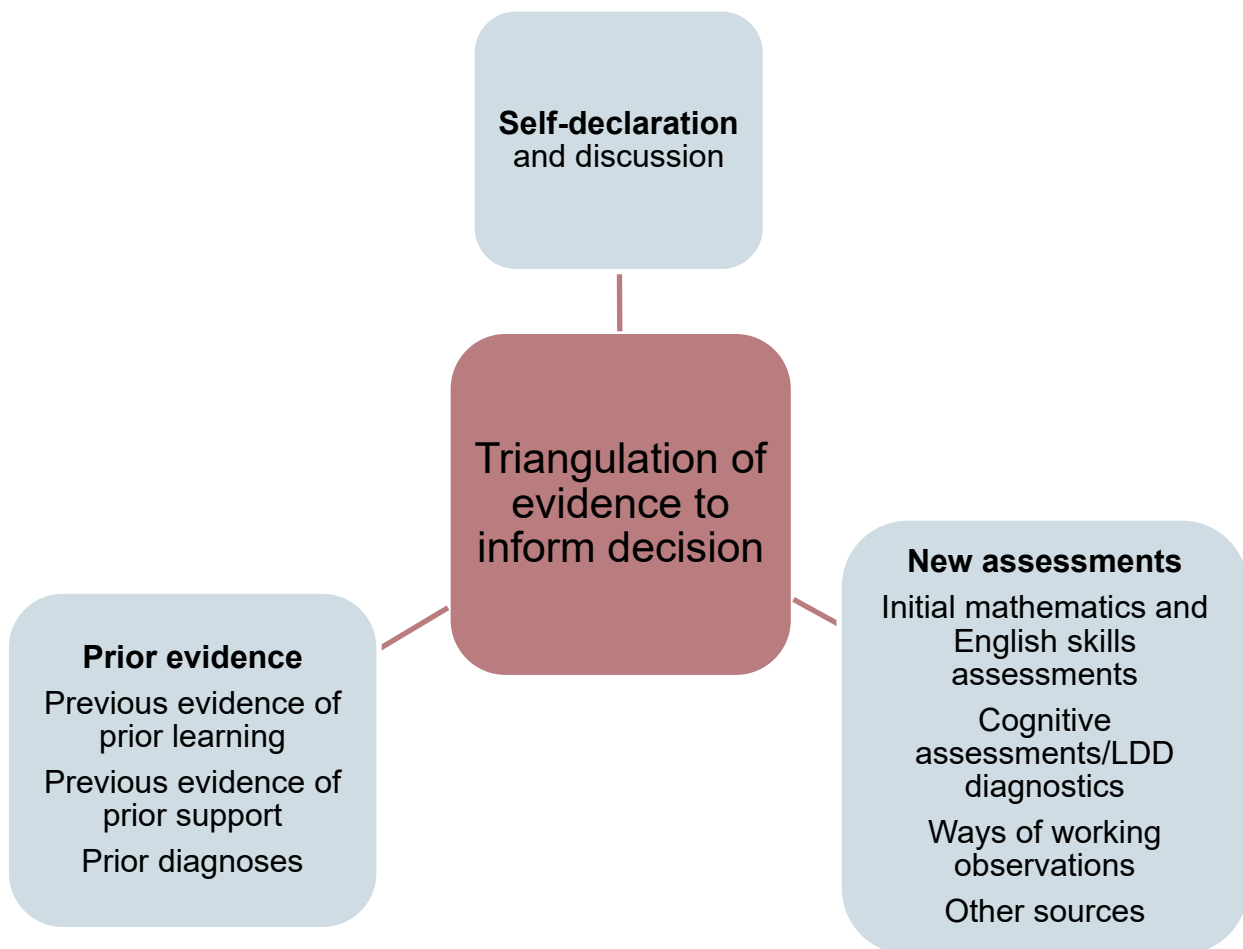
Self-declaration

A learner's self-declaration of a LDD gave providers a starting point from which to gather additional evidence and understand how learning and achievement were impacted. Self-declaration might occur at different stages, for example at initial application, on an enrolment form or in discussion with a provider representative (see page 18, Discussion with learners).

A limitation was that learners might not self-declare due to lack of awareness of specific difficulties, embarrassment or fear of the consequences for their apprenticeship or employment.

> They might be new to the company and they worry that it will be a bad thing for them and their career and we're trying to tell them, "No it isn't, it's just the way your brain works, it's fine." – *Provider*

Discussion with learners

Discussions between providers and learners came in the form of interviews, meetings, and conversations. The time taken varied, with one provider stating an hour and another a range from 20 minutes to one and a half hours. These took place either face-to-face or online and involved a suitably qualified staff member, such as a functional skills tutor or member of a learning support team. Such discussions were stated to be set in a supportive environment which could build a personal connection between provider and learner. In some cases, more than one discussion might be held, such as self-declaration in an initial discussion leading to another more in-depth discussion with a learning support officer.

Discussions between providers and learners were also considered valuable in providing the opportunity for learners to talk about a range of matters that could include:

- Barriers to learning (subject-related, such as reading, and/or cognition-related, such as working memory and processing).

- Sources of evidence in their possession, if not already stated.

- Additional support provided previously, either in school or by other providers, and the impact, or not, of this.

- Experiencing difficulties but schools not acting to identify a potential LDD.

- Being placed in lower sets at secondary school.

- Examination grades achieved and experience, such as, multiple re-takes and failures.

- Initial assessment results (functional skills and/or cognitive assessments) and how these reflect their prior experience, view of their needs and support required for these.

- Their day-to-day 'lived experience', such as, not being able to tell the time or copy a phone number down correctly.

- Experience at school in their home country for learners with EAL to understand whether this reflected a LDD rather than a current language barrier.

This helped the provider understand the learner's perspective, which, combined with other evidence afforded important contextualisation.

> They may not fully understand why [they received additional support] but for us to know that happened is crucial evidence. – *Provider*

Limitations associated with the discussion process primarily replicated those for self-declaration, including that a learner may not self-declare due, for example, to fear of consequences for their apprenticeship or career. There was also the potential for the learner to be reticent to speak about negative prior experiences.

Evidence of prior learning

Examination certificates offered providers clear evidence of accredited prior learning, with low grades considered a potential indicator of a LDD and suitability for the flexibilities. Grade disparity between English and mathematics could also be a helpful indicator of a LDD, as a relative strength in English would indicate reading the mathematics examination questions was not a problem.

More broadly, personal learning records (PLRs) included additional information about accredited courses started but which the learner had either failed or not completed. In one case, a provider used desktop analysis to identify potentially eligible learners due to low GCSE grades and contacted them in case they did not self-declare, while another stated:

> If I see a learner coming through that wants to do the apprenticeship and I can see that they've got an exemption in English, but they've got a history of failing maths…they're getting 1s over and over again or you've got people that have got an F, then a G and then an F, then G; then they've gone to the new version and there's again 1s and 2s...I'll cherry pick those out. – *Provider*

Evidence of prior support

Examination access arrangements were a key source of evidence showing that learners had received prior support for an identified need. The Joint Council for Qualifications' (JCQ) Form 8[8] provided information about examination access arrangements and reasonable adjustments to support needs, with one provider highlighting how this was

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[8] https://www.jcq.org.uk/exams-office/access-arrangements-and-special-consideration/forms/

helpful to refer to during discussions with the learner. The JCQ Form 9[9] provided evidence of specialist assessment of a learner's way of working. Other communication evidence might be used with learners' consent, for example from schools about support provided.

> There isn't always a lot of evidence with regards to previous things that happened…you get a lot of comments from learners saying "My school wasn't very good at this kind of thing" or "My parents asked for this to be checked out and no one did anything." So, there wasn't necessarily a lot of evidence like the JCQ 8 forms and things like that. So, we're very much relying on someone who's always struggled but doesn't know why.
> – *Provider*

Prior diagnoses

Prior diagnoses of LDDs offered valid clinical assessments. One provider declared these to be the 'gold standard' of evidence for assessing eligibility.

However, a few providers commented that older learners were potentially less likely to hold such evidence compared to younger learners, due to either not being previously diagnosed, losing the evidence over time, or it expiring. Some learners might also have undiagnosed LDDs, for example those with autism. Additionally, the time required to receive medical reports from General Practitioners could be problematic, with the learner needing to request these themselves due to General Data Protection Regulation (GDPR).

> They [the provider] wanted to see my original dyslexia report, but it's been over 20 years since I was diagnosed, so I can't find it. – *Learner*

Case example

One provider explained how they had come across learners with ADHD who had tried and failed to pass functional skills examinations because of their concentration levels and lack of reasonable adjustments applied in the past. The provider said that while learners may not have needed a reader or scribe as they did not have a specific learning difficulty, they had received the ADHD diagnosis (for example, from the Child and Adolescent Mental Health Services (CAMHS)) and it was viewed by the provider as 'obviously affecting their education'. The provider, based on their reasonable adjustments' assessor training, completed a JCQ Form 9 referring to learner's normal way of working being affected and how they had tried and failed to pass examinations. This was used as a source of evidence for eligibility.

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[9] https://www.jcq.org.uk/exams-office/access-arrangements-and-special-consideration/forms/

Initial English and mathematics skills assessments

Providers routinely used initial English and mathematics skills assessments to determine current working levels in English and/or mathematics, for example, if learners had not achieved a GCSE grade 4 or Level 2 functional skills. The assessments helped the provider to consider the gap between learners' current level and the level required for the apprenticeship applied for and whether the latter was realistically achievable, with support, over its duration. Low scores could prove helpful indicators of potential need.

Additional evidence sources were used in conjunction with these assessments in some cases. One provider said that a functional skills tutor sat with the learner when completing the assessment, encouraging them to talk through their ways of working, which provided information on difficulties experienced. A few required learners to complete an observed free writing exercise alongside the initial assessment to provide additional evidence of English skills.

A few also referred to using diagnostic assessments which were considered to provide additional value in informing the functional skills tutors of relative strengths and areas in need of development. One learner talked about the potential benefit in terms of how test outcomes resulted in provision of individual support.

Overall, such assessments were seen as helpful but obtaining complementary evidence, such as discussion with the learner about their results, was considered as important.

However, some limitations were identified by individual providers, such as, the assessments not identifying a LDD or learners 'having a bad day' or being nervous when tested in an acknowledged area of weakness.

Lack of supervision when completing assessments was also highlighted as a potential limitation, where learners could seek assistance with their completion. One provider had brought in invigilation in the past year to address this issue.

> But I think it also highlights how desperate some young people are to do the apprenticeship that they know they can succeed in and how they've almost learnt to hide, by whatever strategy, the learning difficulty in order to be able to get on. – *Provider*

Cognitive assessments/LDD diagnostics

Providers used a range of approaches to assess learners' cognitive skills, for example, using an online cognitive assessment program and dyslexia screening programs. Reference was made to assessing:

- Cognitive functions such as short-term memory, working memory and speed of processing, to establish whether these were below the normal range and standardised score that indicates low performance.

- Dyscalculia and dyslexia.

> Someone [from the provider] came to college at the start and did some tests and said I had dyslexia and learning difficulties…At school, I always had extra time in exams, and they helped me but I didn't have anyone tell me I was dyslexic...I always struggled at school, but they didn't test for it there. – *Learner*

The scientific basis for such assessments afforded them credibility with providers and having standardised scores was seen as helpful in identifying those with a LDD, for example, in working memory speed. Holding a discussion with a learner subsequently to explore the results and how this reflected their experience was reported to be helpful to gain a clear picture of their difficulties and needs, and consider implications for their achievement in English and mathematics. It also helped learners understand why they experienced difficulties.

> I've just seen somebody this morning and she was in floods of tears because she was so grateful about somebody taking time to listen to her and actually give her some answers and explain what her difficulties were…To actually to say to somebody, "Listen, we know you're great at your job, but what we're doing is we're going to reduce this to entry Level 3." – *Provider*

Perceived limitations or considerations from a few or individual providers included:

- Independence in completing online cognitive assessments could not be guaranteed unless supervised.

- Reading for learners with English as an additional language (EAL) might affect understanding and result in a lower score.

- There could also be a mismatch between self-declaration of a LDD and cognitive assessment outcomes (although this comment was based on prior experience outside of the Pilot).

Ways of working observations

Providers said that staff members and employers were able to refer learners experiencing difficulties based on their observations once they had started the apprenticeship. This offered another opportunity to flag needs alongside learners' self-declaration.

Functional skills tutors were important in this regard as they could help identify a learner with a LDD due to their expertise in noticing potential issues.

> The maths teacher sat with her and it was soon very evident that she had no idea what division was, but could do multiplication with visual aids support. – *Provider*

Examples of establishing learners' ways of working included:

- A mathematics tutor working with small groups following initial functional skills assessments combined with a cognitive assessment and discussion to provide a triangulated approach.

- Weekly collation of tutors' observation evidence by an additional support worker to identify whether learners were experiencing difficulties across lessons and not just within one subject.

- One-to-one tutoring provision over a 6-week period to identify whether the learner had learning gaps (and so might not be eligible for a flexibility) or were exhibiting, for example, retention difficulties (and so could be eligible).

- Tutor feedback on examples of work alongside evidence of support provided identifying a lack of learner progress.

> I started in September and went to maths class on a Monday each week. Then two weeks ago [the tutor] asked if I was struggling and if I found it hard to concentrate. I said yes, and she said there was this Pilot that she could put me on and I could do maths and English at a lower level. – *Learner*

A few identified logistical challenges in managing such arrangements, for example achieving these observations within the 8-week window[10] due to scheduling of lessons or staffing ratio issues.

Other evidence sources

Some other evidence sources stated by a few or individual providers in interviews or recorded on the Expressions of Interest (EOIs) included:

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[10] The current process for identification of an apprentice's learning needs is set out in the Apprenticeships Funding Rules and states that this judgement must be made within 8 weeks of an apprentice beginning their apprenticeship[10]. The same timeframe has been used for the pilot.

- Parental discussions (with learner consent) - referred to in a few cases, primarily because parents/carers had a better memory of earlier childhood experiences. These focused on a learner's prior learning experience/achievement and/or support. A few learners also mentioned these taking place.

  > They asked me some questions and my mum was there. I could answer some of the questions, but I was so young when I was diagnosed that I couldn't remember it all. My mum could answer about when I was diagnosed. – *Learner*

- Lapsed EHCPs, prior statements of educational need, or evidence provided to a local authority in support of an EHCP, which did not lead to one being issued but supports a LDD being present.

- Employer feedback/discussions with providers on evidence of learner need.

Tests used to assess progress might also provide evidence of an issue as highlighted by one learner:

> I started the apprenticeship and the provider gave me a normal progress exam and it had gone really wrong. Some of my answers weren't relevant to the questions that had been asked. So, they then tested for dyslexia and dyscalculia and found I had it. It all makes more sense and I understand why I struggle now. – *Learner*

Considerations for evidence collection and use

In collecting evidence, there was a range of considerations undertaken by providers beyond choice of approaches. These are explored in the sub-sections below and focus on:

- Weighting and triangulation.

- Whether to make adjustments to approaches used.

- Ensuring manageability for providers and learners.

- How to communicate requirements.

- Whether to adopt a consistent approach or allow flexibility.

The final sub-section discusses how confident providers felt in making decisions on eligibility based on such considerations and evidence collected.

Weighting and triangulation

Overall, providers considered triangulation of evidence to be important when making eligibility decisions so that they were informed by a number of complementary sources. Examples included:

- A RAG (red, amber, green)[11] approach in which medical diagnoses were seen as green or the 'gold standard'. Amber represented examination access arrangements (JCQ Form 8) and other evidence of previous support provided, for example at school.

- Prioritised use of specific LDD diagnostic tests providing reliable standardised scores (complemented by a discussion with learners), with eligibility only offered to learners scoring below average on these.

- Another stated similarly that they would focus on standardised scores but exercise professional judgement in borderline cases, as they would be allowed to with examination access arrangement judgements.

Providers emphasised evidence sources they saw as providing most value with the 4 most commonly represented as follows. In most cases, 2 or 3 of these were identified in combination:

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[11] Red equates to a lower judgement on the contribution of a particular evidence source to decision-making; amber equates to a medium contribution and green a higher contribution (i.e. the most robust).

- Cognitive assessments/LDD diagnostics.

- Functional skills assessments.

- Ways of working reports.

- Discussion/self-declaration.

Most providers stated that all evidence sources held some value and contributed to overall triangulation. A few individual comments were however made on sources considered to have more limited value:

- Use of past papers as if it was a subject learners did not like at school, they would be unlikely to like doing this again in test conditions.

- Evidence of ADHD which was perceived by one provider to be related to 'general learning ability' compared to LDDs specifically related to functional skills, such as, dyslexia and dyscalculia.

Refining the approach

The majority of providers said that the evidence collection approaches identified on their EOIs for the Pilot had broadly remained the same in practice. They also planned to keep the same processes moving forward as they worked well and were based on standard approaches with which providers were familiar.[12] A few expressed a commitment to maintaining fidelity to their original Pilot plans (as stated in the EOI).

In a few cases, evidence collected was reduced:

- Inclusion of a mental health assessment was initially proposed but not included due to concerns about its potential accuracy and therefore validity.

- Gaining school reports was not pursued due to sufficient evidence having been obtained from other sources.

Beyond this, any changes were more refinements to stated approaches, including using additional assessments, or plans to introduce these. Individual cases reported:

- Reducing the number of sessions in which tutors observed learners' ways of working from 6 to 4 due to the time required.

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[12] A few had not yet had to use the approaches with applicants and so there had not been a need for change.

- Holding a discussion with the learner to complement self-declaration, initial skills assessment and cognitive assessment, and which informs their learning plan.

- Adding dyslexia and dyscalculia screening assessments to complement the cognitive assessment used.

- Adding an assessment for reading, spelling and mathematics skills.

- Carrying out more detailed analysis of initial functional skills assessments.

Manageability of evidence collection processes

Providers and learners were asked about how manageable the processes for evidence collection were.

Manageability for providers

Some providers commented how evidence collection was not necessarily burdensome (compared to usual learner assessment), with individuals referring to:

- Evidence being easy to assess once collected.

- Observed assessments being built in as part of normal routines.

- Examination results accessed through provider systems.

Other providers however, did report demands that could be onerous and burdensome. These largely centred around the time taken to arrange evidence collection and carry out assessments, and included:

- Administration arrangements (for identifying and confirming learners' eligibility for the flexibilities, and arranging assessments with busy specialist staff).

- Requesting and receiving evidence from external sources, such as previous diagnoses from doctors (either directly with permission or via the learner).

- Conducting assessments.

- Ways of working tutor reports, for example, where this was based on evidence collected over several taught sessions or observing learners completing an assessment.

- Evidence collection coming at a busy time, such as, alongside a broader intake of students.

- Following up learners for evidence submission.

    Unfortunately, it goes with the territory that a lot of learners who do struggle with their memory and their reading and writing forget to get the paperwork back to me. So I've got, I think, 12 outstanding people who I've sent the paperwork out to. I keep nudging them to say "please, can you get this back to me?" But they haven't got it back to me. So those learners are still waiting to go on the Pilot. – *Provider*

Manageability for learners

Most learners thought that the approaches taken to find out about their LDD were not too burdensome, with comments using words such as 'straightforward'.

    I now understand how I process stuff, which is great. The tests weren't stressful - I enjoyed them because they helped me understand how my brain works. I know I'm okay; I'm not thick. I didn't have to be embarrassed to ask for help or be the way I am. – *Learner*

Evidence of prior learning and support (such as JCQ Form 8 and the PLR) forwarded from previous providers or organisations could reduce demands for evidence. Strategies used to reduce burden on learners included:

- Not having a time limit on a functional skills assessment or cutting this short if the learner was completely struggling.

- Organising breaks in discussions if this helped learner attention.

- Conducting reading assessments through an online meeting to enable explanation of the process which one provider considered, would also likely support learners with EAL.

- Offering face-to-face support for cognitive assessment completion instead of online if preferred, or completion across 2 sessions.

    At no point did I feel under pressure. They reassured me the whole time that there was no right or wrong answer; [that I could] just write down what I thought. – *Learner*

However, providers noted that some aspects of evidence collection could be burdensome for learners including:

- Accessing previous diagnoses due, for example, to time taken to gain a doctor's appointment and facing potential charges for this.

- Completing paperwork that needs use of a home printer.

- Travel to complete assessments at the provider's premises.

Providers acknowledged that older learners might face additional demands as prior evidence of need may have expired or been lost over time, and examination results not automatically received (as systems for this did not exist at the time).

Where learners did experience difficulties, these mostly related to accessing documentary evidence of their LDD and completing assessments. There were few references to these however:

- Previous diagnoses, for example of dyslexia (of those that stated this, only one was able to easily locate it).

   Because I didn't have any written record we could find, I had to write down everything I knew and my family remembered from seeing doctors and things…But it was 36 years ago. – *Learner*

- Assessments seen as difficult, causing stress or difficult to access, such as the initial functional skills assessment.

Communication of requirements

Providers' communication of requirements to learners who were offered the eligibility, took place at various times, from the application stage onwards, with references made to prior to interview, prior to sign-up, and at enrolment.

   It was pretty much straightaway. I took all of the tests in August before I even started the apprenticeship. It was all planned and prepared before I started…I did all the tests before I started so we had time to get all of the information in before I began. – *Learner*

Case example

One provider explained how an initial phone conversation is carried out with the learner before a follow-up email is sent. This sets out the types of evidence that may be gathered alongside a DfE consent form and an additional provider version about being on the Pilot. It also sets out that if the learner is given the flexibility exemption, they still need to study functional skills and achieve to best of their ability.

Several learners indicated that they had been identified for the Pilot once they had started.

When I actually started the apprenticeship, I was offered the chance to do my maths at a different level that I felt was appropriate to me. I didn't know it was possible when I applied. – *Learner*

Consistent or flexible assessment

Most providers said they applied a consistent approach, to maintain fidelity to an equitable process. Some stated that although it was standardised overall, flexibility might be appropriate in relation to, for example:

- Tailoring of cognitive diagnostics to learner need.

- Discussions varying according to learner need.

- If a cognitive assessment was borderline but other evidence collected indicated the learner had a LDD.

- Variations in attendance (for example, when some one-to-one observed functional skills sessions with tutors had been missed, so supplementary independent work had been provided as an evidence source).

- Adjustments on how assessments were managed to support access, as stated earlier on .

Confidence in decision-making

Providers said they felt confident in making robust, fair judgements based on several factors that reflected themes around methodology, staff expertise and experience of the process adopted. These factors included:

- Triangulation of evidence sources collected which offered complementary findings.

- Staff experience and specialist expertise, either individual or combined (SENCO; a Level 7 qualified assessor of additional needs; ALS staff).

- Team-based approaches, offering discussion of evidence, internal challenge and shared decision-making.

- Underpinning principles guiding decision-making, such as, a duty to get the decision right for the learner and employer.

Several providers stated how their decision-making had meant some learners were identified as ineligible for the flexibilities, with one highlighting how excluding learners

in such cases aided confidence in the process they used. Examples of reasons for ineligibility included:

- Gaps in learning and/or low attainment due to factors other than a LDD:
    - Mathematics anxiety.
    - Lack of engagement at school.
    - Having EAL.
- Standardised diagnostic test scores (such as for reading) being above the 85 benchmark.
- The learner's level of literacy considered too low to ensure safe practice in reading and understanding written instructions in the job role.

There's been a lot more applicants and assessments completed, than people joining the programme, so it has worked. – *Provider*

Tailoring provision to support continued progress in English and mathematics

Once offered a place on the Pilot, providers worked to ensure that provision helped learners progress in their English and mathematics. Initial views of the impact of this on learners was offered by both providers and learners.

Using eligibility evidence to plan delivery and support

Providers referred to how they had drawn on the evidence collected to plan delivery and support for learners, primarily using cognitive assessment and functional skills assessment outcomes.

Cognitive assessment evidence enabled providers to establish and communicate learners' LDDs to those supporting them so they could tailor provision accordingly. Examples included providing:

- Extra time for processing.

- Reading support, such as in-lesson support as well as for examinations.

- Dyslexia-friendly online content.

- Small group tutoring with a dyscalculia expert (planned for January 2024).

- Support to an employer to tailor materials and communications to meet learner needs, such as, using coloured handouts and providing written instructions alongside verbal instructions to aid retention.

Functional skills assessment results were also used to inform tailored provision with examples including:

- Identifying areas of relative strength and need, to draw up Individual Learning Plans with steps needed to achieve Entry Level 3 and subsequently upskilling once this has been achieved.

- Tailoring of workplace assessments and learning to individual contexts.

- Proving targeted learning materials, such as for homework.

Learners also referred to tailoring provision in terms of tutors:

- Considering their specific needs, for example, through adaptation of delivery materials to aid accessibility or reader support for examinations.

- Varying learning design, for example regular one-to-one tutorials:

  > The tutor has been really helpful though and has tailored the way she teaches me maths to the ways I can remember. She finds techniques that I can get. She has told me about exam technique and that as long as I show my working out, it doesn't matter which methods I use. Knowing that fills me with more confidence. – *Learner*

Learner reasons for applying, experiences and satisfaction

Learners identified a number of reasons for applying for their apprenticeships including:

- A job they had always wanted to do.

- Career progression.

- Preference for practical work.

- Family influence, for example a close or wider family member already in the sector.

- Employer recommendation.

  > To get to be a [post title]. That's why I have done it. I'm really glad I have; I'm really enjoying it. I'm enjoying being back into learning and, since having my kids, it's good to think about your own future. – *Learner*

The flexibilities themselves had attracted a few learners to their apprenticeship, as in the example below. Most were not aware of it however, when applying. Several were unsure about the functional skills requirements for their apprenticeship when applying.

> I haven't got a GCSE in English and maths at all, so when I saw that you could do lower level…I thought it was a really good idea and I applied...I wasn't the best student at school and the dyslexia made me struggle. – *Learner*

Learners stated that overall, they were satisfied with their apprenticeship experience to date. Key indicators of this related to the following points:

- Feeling confident about passing the apprenticeship due to the reduced the level of English and mathematics required (a few did not because the expected level was still seen as too challenging). A few also referred to having a choice of levels and a flexible study programme design.

> I panic particularly with numbers and sums and I can't remember maths, so being tested by the provider and finding I have dyslexia, dyscalculia and dyspraxia, it all makes sense now. Being able to do this at a reduced level of English and maths has opened up opportunities for me. Doing the Entry Level 3 in maths especially; I'm finding it a lot better. I'm managing to deal with the panic that I feel with numbers on this course at this level. – *Learner*

- Making progress in English and mathematics, now understanding aspects that they had not previously, remembering learning, applying learning and passing examinations.

    > It was hard doing the Entry Level 3 and I struggled a bit. Especially as I have a really full-time job and a family as well. Any higher English and maths qualification would just be too much. The maths was the hardest. But I have passed. – *Learner*

- Feeling well-supported by their provider and/or employer and particularly functional skills tutors.

Where learners felt less well supported, this largely reflected the opposite of the points made above with a few or individual comments referring to:

- Learning design, such as large groups in which questions could not easily be asked, distractions were present, or speed of delivery was too fast.

- On-to-one sessions with tutors offered but not being provided or being inconsistently provided.

- Lack of communication, for example about which level English and mathematics examinations the provider intends to enter the learner for.

- Lack for employer support for study time, for example due to workplace demands.

- Accessibility of materials.

> For the action plan…I really struggle to read. I get fed up with reading after a while and it all goes to gobbledegook. Sometimes when it's a long document or a long list of stuff, where they put down things like where they would make changes for me, I haven't read it. It's too long and it does my head in. I get really bad headaches then. It would be better if it was on one file and had the active speech thing for it so I could get it to read it to me. I could always copy and paste the document into Word, but really it should be the provider's responsibility to make sure that I can access it. – *Learner*

Provider perceptions of impact

Providers reported positive responses from those involved in the Pilot overall. Impact on learners was noted by some providers with respect to:

- Progression for some learners in English and mathematics, such as examination achievements or through internal tools like a functional skills tracking program or RAG rating of skills evidence within an e-portfolio.

Case example

A provider uses an e-portfolio system so that there is a joined-up approach between different parties. A functional skills tutor assigned to work with Pilot learners writes, for example, journal entries for sessions about what has been learnt and what homework has been set. The learner's coach who deals with the core learning for the apprenticeship can then see this which informs the contextualisation of functional skills in the workplace. The employer also has some access to the e-portfolio so there is a shared knowledge of learner progress, reflected in observational assessments and witness statements.

- Learners reporting confidence gains to providers in subject understanding and reduced anxiety.

- Tutors reporting good learner engagement and confidence.

- Learners' benefiting from awareness of their LDD.

Overall implementation experience to date

This section discusses providers' perceptions of the Pilot around recruitment and use of the 8-week window for assessing eligibility, as well as broader views on what had worked well or had been challenging.

Learner recruitment to the Pilot

Most of the 17 providers considered the numbers of learners on the Pilot, at the time of interview, to be below those expected, including 5 who had not yet recruited learners to date. Where providers identified successes in recruiting learners these largely focused on promotion of the Pilot or use of internal processes.

Examples of promotion included:

- A website notification and link for self-declaration with an estimation that this accounted for around one-fifth of their Pilot learners.

- Using marketing or business development team engagement with employers to keep the Pilot at the forefront of stakeholder engagement.

- Social media use.

  I spoke to someone at [another provider] and they're all over it with their social media, much better than we were. So, I went back to the marketing team and said, "This needs to be an absolute priority – we need to be pushing this out more" and as a result of this we've had a couple of applications come through. – *Provider*

Examples of internal processes included:

- Staff identifying potential candidates with low grades at interview and referring them to the Pilot team.

- Desktop analysis of very low English and mathematics grades and directly contacting learners as they may not self-declare.

- Contacting previously unsuccessful applicants without benchmark grades and evidence of LDD due to private test affordability.

However, a few providers did not promote the Pilot. Two had not yet recruited and another felt that if they had promoted the flexibilities, they would have had more learners. Reasons behind not promoting comprised:

- Feeling that it was to be applied to existing or newly applying learners as a matter of course.

- Being cautious as it was a Pilot.

- Concerns that it could result in being inundated with learners applying for the flexibilities rather than having actual needs.

Where providers had considered potential reasons for lower than anticipated recruitment, these included:

- Learners already having the required Level 2 qualifications or higher level functional skills precluding them from the Pilot.

- Organisational factors, such as staffing changes, or needing improved communications about the Pilot internally or externally.

- Employer factors, such as not currently having openings for apprenticeships.

What has worked well?

Providers said that learners with a range of LDDs had been recruited onto the Pilot, including those with dyslexia and/or dyscalculia. Overall, they felt that the Pilot worked for learners across a range of LDDs who had been considered eligible for the flexibilities. In one case, a provider had not included learners with social, emotional and mental health (SEMH) needs in their eligibility criteria while some others did refer to this in their responses.

Other individual examples of how the Pilot was working well or had had a positive impact organisationally included:

- Team expertise: team-working, such as in creating the Pilot model, and whole team support for making functional skills 'everyone's business'.

- Relationships with a provider's business development team to communicate the flexibilities to employers.

- Identifying issues such as chasing learners for evidence collection or administering assessments and creating support roles for these.

- Reducing the number of steps in an evidence collection process to improve efficiency.

- Increased awareness of vocational trainers about LDD, such as showing curiosity about why a learner might not have achieved their GCSEs at school or spotting

difficulties in managing in the workplace, and referring this more quickly than previously.

- Increased staff understanding of LDD through interaction with those with specialist expertise.

- Greater emphasis on trainer-assessors contextualising functional skills in the workplace.

Providers also considered that the Pilot was enabling learners to gain an apprenticeship and that there was support for them in this:

> One of the things has worked well is the learners actually feeling like somebody has understood their learning difficulty or disability because young people have struggled for a very long time and they do have low self-esteem and they do feel like failures. But they've managed to get an employer and then we're able to say to them, "We have a scheme that if you fit all the right criteria, you will succeed in getting a full apprenticeship." And I've had parents say to me that it's life-changing. I've had learners say to me, especially older learners, that it's life-changing. They've now got an opportunity to succeed and get a full qualification. – *Provider*

Problems, barriers and improvements

Overall, providers did not identify many problems or barriers beyond those associated with the 8-week window (see page 39) or those already mentioned in previous sections, such as: time taken to collect evidence (page 27), learners not self-declaring (page 17), or organisational issues, for example improvements needed to internal communications (page 36).

Other problems and barriers identified in a few or in individual cases included:

- Costs incurred if the DfE required an externally written report of a LDD as evidence.

- End Point Assessors' awareness of the Pilot and its implications for qualification levels achieved.

- Recognition that mathematics anxiety could be a potential barrier to achievement but is not something that can be currently tested for or which falls within the provider's criteria for eligibility as it's not a LDD.

Providers stated that they had made some improvements to the systems and processes that were in place at the start of the Pilot, in some cases, with individual comments about:

- Collecting all the evidence at the application stage before sign-up.

- Assigning staff to roles that help efficiency, for example, one coordinator carrying out all the assessments for Pilot learners.

- Trying to improve processes to get paperwork back from learners sooner, including developing approaches where the burden is taken off the learner.

> The problem bit is getting the learners to get their background information back to me. I think probably more of an understanding from the employers and having the employers online to say, "This is your learner, print these out for your learner, give them time to do these sheets and then you can scan it in on your printer and get them back to me." A lot of our learners don't have printers at home and maybe feel embarrassed about getting it printed off at the office at work. And then we've had another member of staff on Zoom with the duplicate sheet, reading it out to them as they were filling it in, but it's a really lengthy process. – *Provider*

The 8-week window

The current process for identification of an apprentice's learning needs is set out in the Apprenticeships Funding Rules and states that this judgement must be made within 8 weeks of an apprentice beginning their apprenticeship[13]. The same timeframe has been used for the Pilot.

Provider views on whether the timespan was sufficient for this purpose were mixed, including comments that it should not be a protracted process or rushed (which risks reducing evidence quality and/or missing learners who could be eligible).

> If you're going to prove a normal way of working and you're going to get learning support set up for these learners, it needs to be done early. It can't drag on, and somebody 9 months into their apprenticeship being assessed - it shouldn't work like that. – *Provider*

Providers' views largely fell within 3 categories – that the window was:

1. Achievable with no caveats (although a few stating this had not yet recruited).

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[13] Apprenticeship funding rules 2023 to 2024 (publishing.service.gov.uk) – line 48

2. Achievable but with caveats such as:

   - If evidence collection was straightforward i.e. with no issues that would cause delays.

   - It could lead to potential risks of missing something that would affect eligibility.

3. Problematic/challenging.

Challenges identified in gaining evidence and making a decision on eligibility within the 8-week window included those previously identified such as: time taken for assessments, following up learner submissions, and potential self-declaration issues. Other statements included:

- Time needed to build a relationship with the learner to support self-declaration.

- Being more demanding than for applying the EHCP flexibilities where all of the evidence is already collated.

- The time needed for functional skills tutors to assess learners' ways of working through observation over a series of sessions and then report on these:

  - Problematic if the apprenticeship programme structure means that functional skills sessions do not start until after the window closes or offer limited time for assessment within the window. In one case, this resulted in a few learners not being identified in time.

  - Day release provision could mean learners had a full timetable which limited providers' time to assess them.

- Unexpected issues that might cause assessment delays, such as learners having to cover for work absence.

- Organisational capacity, for example, some larger providers might have better access to specialist staff to conduct assessments.

In a few cases, providers identified structures and processes that supported achievability in the 8-week window:

- Completing functional skills assessments before the window opens to give a longer time for gathering and assessing evidence.

- Staff roles adapted or created to increase capacity to manage demands.

- Having quarterly cohort start dates which allow for screening/assessment prior to starting and then using the 8-week window to check if someone has been missed (but acknowledging that roll-on, roll-off programmes would not allow for this).

System considerations on the flexibilities

This section discusses providers' broader system views and considerations on the flexibilities both in terms of its potential impact on learners accessing apprenticeships and how it might be achieved at a larger scale, internally and nationally.

Entry Level 3 appropriateness

Overall, providers considered that Entry Level 3 was appropriate for learners and the apprenticeships for which they were applying. A few stated that:

- It depended on their initial functional skills assessments as some might achieve higher than Entry Level 3 on these (this also had implications for targeting progression in functional skills was targeted).

- It was important to be fair to the learner so that they were set up for success to achieve their apprenticeship.

    They have to have an ability to read and understand and do basic maths. So, the Entry Level 3 will confirm they've got that. If you then drop it further, you've then got the issue that they might be able to practically undertake a task, but would they be able to operate safely within their environment? Because, if they're too low, then they might not be able to read the instructions or input the required data. So, from our point of view with the type of employee that we work with, Entry 3 would definitely be what I'd recommend. – *Provider*

Reducing barriers for prospective learners

Providers strongly agreed that the flexibilities would reduce barriers for learners and offer a better apprenticeship experience, with several stating: 'absolutely', 'definitely' or '100%'. Reasons given included:

- Making apprenticeships more inclusive and attainable for learners with LDD who were occupationally competent by reducing English and mathematics requirements and pressure to achieve these, while still enabling them to progress in these subjects.

    It is a shame that this one thing [mathematics] stops you from doing something you would be good at. It holds you back from so many opportunities. – *Learner*

- Level 2 functional skills are not needed for some roles.

- Redressing potential inequality between flexibilities offered to learners in receipt of an EHCP, and learners without one who may have an undiagnosed LDD.

- The opportunity of employment with its benefits of earning, fulfilling a desired occupation that is productive and supporting sector employment needs.

  > When the school told me there was this route it was fantastic. It is a long route, but it is there and I want it badly…I wasn't the best at school and it feels good to do this. – *Learner*

- Improved self-esteem, for example, not being adversely affected by multiple examination failures when trying to achieve a higher level.

  > I think we do see learners with really damaged self-esteem, really damaged belief in themselves as a learner…I had one this morning… this learner has attempted maths a number of times. Now, citing sort of mental health [difficulties] with continued assessment and trying and the employer has basically said, "I'd rather them fail their apprenticeship and I keep a healthy worker than continually put them through their maths". – *Provider*

Scaling

Providers strongly indicated that the Pilot should progress to become policy, based on the reasons stated on . Some also referred to previous learners that would have benefited from such flexibilities.

> I think it's [the Pilot] a really important scheme and I think it really needs to move from being a Pilot study hopefully into something that's actually put into practice because at the moment we're losing young people who are very, very good in their area of apprenticeship [but] they can't get maths or English at the right level. And I think the problems with that go beyond almost just losing them, because they start to self-define themselves as people that can't achieve; people that can't move on and can't get a job…it's a bigger picture. – *Provider*

Providers considered scaling at organisational and national level should the Pilot continue. Organisational considerations included:

- Staffing capacity to manage additional demands on time, such as for assessment and administration.

- Budgetary demands as EHCPs are funded by the local authority but additional learners with a LDD will incur assessment and additional learning support costs.

- Training of staff so that expertise was not held by a few only, such as, administering specific diagnostic tests

Providers also offered some recommendations for peers or stated they would do some things differently with the benefit of hindsight. These reiterated some previous points about promotion of the flexibilities and internal communications as well as:

- Reviewing the efficiency and manageability of evidence collection approaches, such, as collecting evidence at an earlier stage.

- External communications with local authorities, schools and providers, for example around the benefits of providers engaging with learners with a LDD.

Most providers stated a preference for a more consistent model than a more flexible approach. Implications of this included:

- The need for DfE guidance, such as, a very clear funding rules flow chart which sets out acceptable evidence for LDD identification and avoids risks of:

    - Learners being offered the flexibilities when they should not.

    - Inconsistency across providers with the potential that learners apply to those with easier to achieve evidence requirements.

    - Potential issues of not applying criteria as intended when externally audited.

- Manageability for providers so that evidence collection and administration is straightforward rather than burdensome or too costly.

- Provider size and ability to administer more specialised assessments, such as standardised tests for memory and processing speed.

- Sharing good practice recommendations in some form, such as, through an online community.

- Monitoring so that the application of flexibilities is not abused.

    I think I can imagine the chaos of giving the flexibilities to every provider to say, "Well, you can kind of make a judgement call on what kind of evidence is needed" and the possibility for abuse of that. – *Provider*

However, provider comments offered some support for a measure of flexibility, including:

- The choice of commercial programs used for assessment and/or diagnostics there may be preferences for these or cost implications.

- Being able to add/use evidence assessment approaches considered appropriate for learner needs.

Conclusion

Overall, both providers and learners considered the Pilot had been a positive experience to date. Providers said that learners with a range of LDDs had been recruited onto the Pilot and they felt the Pilot worked for learners across a range of LDDs who were considered eligible for the flexibilities.

Providers stated the importance of making the right decision in evidence assessment approaches to ensure that decisions were valid and appropriate. They typically combined several approaches to gain evidence of learner eligibility, using self-declaration and discussion between the learner and provider, previous evidence (such as, of LDD, prior support and qualifications gained), and other (new) assessments, including diagnostic tests. The combination of these approaches ensured that providers were confident that their decisions were suitably robust with triangulation of evidence a key reason for this, alongside staff experience and expertise.

Providers in some cases referred to instances where they had not offered the eligibilities due, for example, to learners having gaps in learning rather than a LDD, or achieving too high a standardised score in diagnostic tests.

A few providers said they had made some improvements to the systems and processes that were in place at the start of the Pilot, like pre-sign-up evidence collection, assigning staff to specific roles for efficiency, and improving collection of evidence from learners. Some providers commented how evidence collection was not necessarily burdensome compared to usual learner assessment. However, others noted some challenges in processes relating mostly to the time taken for evidence collection and assessment. Provider views on whether the 8-week window was sufficient with respect to this were mixed, including comments that it should not be a protracted process or rushed (which risks reducing evidence quality and/or missing learners who could be eligible). Overall, learners did not find approaches taken by providers to collect evidence from them to be particularly burdensome. Where learners did experience difficulties with the assessment process, these mostly related to accessing documentary evidence of their LDD and completing assessments.

The flexibilities themselves, with the opportunity to gain a lower-level English and/or mathematics qualification, had attracted a few learners to their apprenticeship. Most however, were not aware of it when applying. Where providers identified successes in recruiting learners these largely focused on promotion of the Pilot or use of internal processes, such as internal referrals and grade analysis.

For learners with LDD, participation in the Pilot offered an opportunity to gain an apprenticeship in which they were occupationally competent through reducing

qualification requirements and the anxiety that could be experienced in trying to achieve these.

> I used to sit there and think, 'I'm in Year 12 now, what am I going to do?' and then this came up and it was great to hear. It made me tearful and think I actually have something to do. – *Learner*

Learners stated that overall, they were satisfied with their apprenticeship experience to date. Key indicators of this included: feeling confident about passing the apprenticeship due to the reduced the level of English and mathematics required, and making progress in these subjects.

Providers were consequently strongly supportive of the Pilot's intentions and potential to become policy, considering it more inclusive and appropriate.

> Being able to help people – opening up doors to people where they've had it shut in their face so many times has been quite emotional…all they want is to be given an opportunity and it's been brilliant. – *Provider*

There were scaling up implications. Providers were clear that, if taken forward, communications about requirements, systems and processes need to be clear and robust. This would ensure that only those learners who should receive the flexibilities did so. Wider implications to consider included:

- Producing clear funding rules and guidance on acceptable sources of evidence to assess eligibility.

- Ensuring manageability and equality of evidence collection and eligibility decision-making.

- Monitoring approaches taken to uphold integrity of the flexibilities.

- Sharing good practice recommendations in some form.

Appendix 1: Sample details

Table 1: Provider type

Provider Type	Count
General FE College including Tertiary	8
Private sector public funded	7
School	1
Other public funded	1
Total	17

Source: English and maths flexibilities - interviews with providers

Table 2: Regional spread of provider sample

Region	Count
East	1
East Midlands	2
London	3
National	1
North East	2
North West	1
South	2
South East	3
South West	1
West Midlands	1
Total	17

Source: English and maths flexibilities - interviews with providers

Table 3: Size of provider (number of apprentices)

Provider Size (number of apprentices)	Count
0-50	1
100-500	5
500-1000	4
1000+	7
Total	17

Source: English and maths flexibilities - interviews with providers

Table 4: Provider sample - proportion of learners with LDD (of number of apprentices)

Proportion LDD	Count
11-20%	8
21-30%	4
31-40%	3
41-50%	2
Total	17

Source: English and maths flexibilities - interviews with providers

Table 5: Characteristics of learners interviewed

Characteristic	Count
Age	
18 and below	8
19-30	5
31-50	6
Primary LDD	
Moderate learning difficulties	5
Dyslexia and dyscalculia	10
Other	4
Apprenticeship Level	
L2	8
L3	7
L4/5	4
Apprenticeship subject area	
Construction, maintenance, engineering and manufacturing	5
Business administration and service industries	4
Health and social care	4
Education and community support	6
Current English qualification Level	
Entry Levels/Level 1	3
GCSE U-3	6
GCSE 4-9	4
None/n/a	6
Current mathematics qualification level	
Entry Levels/Level 1	4
GCSE U-3	9
None / n/a	6

Source: English and maths flexibilities - interviews with learners

Appendix 2: Interview topic guides

Apprenticeship English and maths flexibilities: Providers Topic Guide

Introduction

We understand that you are taking part in a pilot of English and maths flexibilities for apprentices with learning difficulties and/or disabilities (LDD), without Education Health and Care (EHC) Plans. This is part of the Department for Education's (DfE) work to remove barriers to starting an apprenticeship for people with a learning difficulty or disability (LDD). There are currently flexibilities in place which allow apprentices who have Education Health and Care (EHC) plans to achieve with lower entry Level 3 English and maths and the pilot is exploring what other forms of evidence could be used for apprentices with an LDD but do not have an EHC Plan to evaluate eligibility for the English and maths flexibility. Nineteen colleges are currently taking part in this one-year pilot.

CooperGibson Research have been commissioned by the Department for Education (DfE) to conduct this research.

The aim of the evaluation is to understand more about the types of evidence that could be used to evaluate eligibility for the English and maths flexibility for apprentices with learning difficulties and disabilities (LDD).

The interview is likely to last about an hour.

Before we begin, I just need to explain about the research and General Data Protection Regulations (GDPR). CooperGibson Research is an independent social research company, operating under the strict guidelines of the Market Research Society's Code of Conduct and GDPR. All the information collected will be treated in the strictest confidence and you have the right to have a copy of your data, change your data or withdraw from the research at any point.

All reporting of the evaluation by CGR will be anonymised. Quotations and examples may be used in the research report but they will be anonymous.

Any personally identifiable information collected by CGR for research purposes will be kept for no longer than 6 months after project completion. We will use the data only for the purpose of completing the English and maths flexibilities evaluation.

If you would like any further information our privacy policy can be found on our website, here; http://www.coopergibson.co.uk/privacy-policy-2/

As part of our quality control procedures, all interviews are audio recorded. Is that OK?

REFERENCE:

Agreement to take part in this research	
Agreement for interview to be audio recorded	

Type of provider	
Role in Organisation	
Role in developing the approach taken to gain evidence of maths and English skills	

1. To provide some initial context, it would be helpful to know a little about your experience in applying the existing flexibilities. Before this pilot, what has been your organisation's experience in assessing learners with LDD on apprenticeships to identify eligibility for the flexibilities in English and maths? (5)

2. We sent you the list of evidence assessment strategies you submitted to DfE as part of you Expression of Interest. Were the approaches used different to the ones you planned at EOI stage? If so, what changes were made and why? (4)

3. What were the reasons for selecting the approaches used to determine eligibility for flexibilities for apprentices without an EHCP? Probe: (7)
   a. What were your reasons for choosing the combination of different approaches (*explore the actual/expected value of individual approaches*)?
   b. How will it be/has it been both accessible and not too onerous for learners?
   c. At what stage did you communicate the flexibilities/evidence required to learners and why?

4. What has been your overall implementation experience to date? Probe: (8)
   a. Has the uptake been as expected? If not, can they think of reasons why this is the case *(probe reasons when take up is lower than projected numbers – see sample sheet)*?
   b. If anything, what has worked well?
   c. What, if anything has been problematic?

d. Barriers and how they might be addressed

e. Has the 8-week assessment window provided sufficient opportunity to collect the evidence needed in order to make robust decisions on eligibility?

f. Are there specific types of learners in the pilot that you are applying the flexibilities for? If so, why? *(Note: if required, give example of specific LDD - the starts so far are mainly with dyslexia/dyspraxia so it will be helpful to find out from providers if they think these flexibilities are more appropriate for some groups than others).*

g. Are there any types for whom it works less well? If so, why?

5. How confident are you as a provider in applying the flexibilities to make the right choices on eligibility? Why?
    a. *[Probe]* If not confident, what might support this? (3)

6. What have been the most valuable evidence sources to make robust judgements to date and why? *Probe:* (10)
    a. How do they know this?
    b. In combination, did they provide you with the information to make robust decisions on who to offer flexibilities to - what combination/triangulation has worked well and why?
    c. Is there a weighting emphasis towards some approaches and, if so, why?
    d. Were any of these particularly time-consuming/burdensome for:
        i. providers e.g. in administering and assessing evidence collected
        ii. learners e.g. in carrying out assessments or submitting evidence? *(probe what was required of learners)*

7. Were there evidence sources/processes that had limited value? *Probe:* (5)
    a. Why was this?
    b. How do they know?
    c. Might issues be mitigated against?

8. How well have the processes used enabled you to tailor your provision to learner needs so apprentices continue to make progress in maths and English? *Probe:* (5)
    a. What has the impact been? *[Probe]* how do they know? – sources of data collection.
    b. What has worked well and why?
    c. Has anything not been as successful and, if so, why?

In the following series of questions, we would like to draw out any further key learning from this pilot for you as a provider to date. *Probe:* (10)

9. *(If time ask)* Is Entry Level 3 the right level for these apprentices and apprentice-ship(s)?
    a. Do you think the flexibilities will reduce barriers for prospective learners with LDD (an no EHCP) to apply for an apprenticeship? If so, why?
    b. Do you think the flexibilities will lead to a better apprenticeship experience amongst LDD learners? If so, why?

10. What would you keep the same if you were to do it again and why?

11. What, if anything, would you do differently and why?

12. Have there been any other challenges or barriers not already mentioned? How have you managed these?

13. What would be your key messages to:
    a. DfE, including scaling this approach more widely?
    b. Other providers if this approach were to continue?

14. Do you have any other comments about the flexibilities pilot, anything that have not already been mentioned?

Apprenticeship English and maths flexibilities: Learners Topic Guide

Introduction

Interviewer: introduce yourself and thank the interviewee for making time to take part in the interview. State that you will explain *what the call is about and that there will be time to ask questions before you start. [use the details below to explain the research].*

Check consent form has been received.

The Department for Education is working to help more people with a learning difficulty or disability (LDD) to do an apprenticeship. To do this, it has chosen some organisations (providers) that offer apprenticeships to try out different ways of understanding Apprentices' English and maths skills and any needs related to their learning difficulty or disability. This will help providers decide the right level of English and Maths for these learners to study as part of their apprenticeship. This could help people with a learning difficulty or disability to do an apprenticeship and improve their English and Maths skills as part of their training.

Your apprenticeship provider is one of those chosen to take part.

The Department for Education wants to find out more about what type of information your provider is looking at to decide what level of English and Maths you study. This will help the Department for Education decide what to do next to help people with LDD start and complete apprenticeships. To help with this we would like to find out about your experiences.

Before we begin, I just need to explain about how we keep your information safe. We will share a report with the Department for Education which will also be published on the internet. This may include some examples of your experiences or what you said to us. But, if we do, we will not put your name in the report, even if we share something you told us. No-one will know that it was you who told us. We are also interviewing other apprentices.

We follow the law about keeping your personal information safe. You can ask for a copy of your data (what you said to us), change your data, or stop the call at any time, without giving a reason. We will keep your information for up to 6 months after the project has ended. Then it will be safely destroyed.

The interview will last no more than 30 minutes.

We usually record our interviews so that we record what you say correctly. Only the research team will use the recordings. Is that OK?

Before we start, do you have any questions about the research you would like to ask?

REFERENCE:

Agree to participate	Yes/No
Agree to be recorded	Yes/No

Please could I ask some questions about your provider and apprenticeship first of all.

Name of provider	
Type of apprenticeship – level and sector/subject	
What English and/or Maths qualifications they are doing as part of their training	

Record from MI

Age	
Primary learning difficulty	

First of all, it would be helpful to find out about your apprenticeship.

1. What made you decide to do the apprenticeship you are doing now?
   a. Explore whether it was because there was a reduced level of English and maths need and whether they would have been able to do the apprenticeship without it

2. Before you applied for the apprenticeship you are doing now, did you think about doing or applying for any other apprenticeships?
   a. Did you experience any difficulties getting onto these? If so, what kinds of difficulties? (Explore if this included the L2 English and maths requirement and what happened if so)

Next it would be helpful to talk about how your provider (name) decided what English and maths qualification you should do while on the Apprenticeship.

3. As part of your Apprenticeship, you can do lower-level English and maths qualifications (Entry Level 3 English and maths instead of Level 2). How do you feel about this?
    a. Explore if they feel this flexibility is beneficial and appropriate for them - if it helped them to get onto an apprenticeship and if it will make the apprenticeship easier to achieve.

4. What ways did your provider (name) use to find out about your learning difficulty or disability and how this impacts your maths and English skills (to help them decide what English and maths qualification you should do)?
   Explore using the prompts below, asking how easy or difficult these approaches were for them and why e.g. in terms of time taken, ease of finding relevant documents, having to do tests/impact on wellbeing?

    a. Did they ask you to show them any information you already had, for example exam certificates or reports on your learning difficulty or disability?
    b. Did they ask you or others about your learning difficulty or disability?
    c. Did they ask you to do any tests?
    d. Did they ask you to do, or provide, anything else to show your skills?
5. When did your provider let you know you about the option to study the lower level English and maths and what information they needed from you to make that decision?

6. Is there anything else you would like to tell us about the approach your provider (name) took to find out about your learning difficulty or disability and how this impacts your maths and English skills
    a. Is there anything that you feel was too difficult and should change or was not useful, why?
    b. How could this be improved?

7. How satisfied are you with your apprenticeship so far? Why??
    a. Do you feel confident that you will achieve your apprenticeship at this stage (including English and/or maths)?
    b. Are there things in English and/or maths that you think you can do better now?
    c. How well supported do you feel? Why?

8. Is there anything else you want to mention about how your apprenticeship provider found out about your learning difficulty or disability and decided what level of English and maths you should do?

For any enquiries regarding this publication, contact www.education.gov.uk/contactus.

This document is available for download at www.gov.uk/government/publications.