

RCN response to the Institute for Apprenticeships and Technical Standards Consultation on a simplified External Quality Assurance system – May 2020

Overall comments

1. The RCN supports apprenticeships as a route to increase the much-needed supply of registered nurses and nursing associates in England. The Government has committed to 50,000 more registered nurses in the NHS in England by the end of this Parliament. Multiple supply routes will be needed to achieve this target, as well as ensuring nursing supply meets demand to support safe and effective care for all patients. Apprenticeships were also identified as a priority in both the *NHS Long Term Plan* and the *Interim People Plan*.
2. All regulation for nursing apprenticeships should be risk based and place student and patient safety at the forefront. Apprenticeship quality assurance regulation should be complementary and not duplicate existing oversight by the Nursing and Midwifery Council (NMC) or by the education regulators Ofqual and the Office for Students. Any changes to regulation must also not undermine the Government's stated target of 50,000 new registered nurses, of which apprenticeships supply will play an integral part.
3. We note that End Point Assessments (EPAs) have been largely suspended during COVID-19, with apprentices only having to pass through the apprenticeship gateway to complete their studies. This is a necessary step given the current situation, and also provides a unique opportunity for a first principles analysis of the necessity of, and quality assurance for, EPAs. We urge the Institute to use this opportunity to assess the outcomes for the cohort of apprentices that will not have to undertake EPAs and use these outcomes to assess the necessity for EPAs in the future.

Section 2 – Role of professional and employer-led bodies

Our response covers section 2 of the consultation, as this is the most pertinent for our organisation, and focuses largely on the need for outcome focused regulation that is risk based and within a framework to ensure consistency in approach.

Question 2a: *Do you agree with the list of organisation types that could be included in the Institute's EQA register?*

We agree with the types of organisations included in the Institute's EQA register.

However, we believe that ensuring consistency in approach and practice across all the organisations who will be undertaking quality assurance of EPAs is of greater importance than which organisations are on the register. There is currently anecdotal evidence of a large amount of variation in the quality assurance of EPAs for apprenticeships in general. The more organisations allowed to undertake EPAs, then the higher the risk of inconsistency in the approaches and assurance.

Should inconsistency develop in the EPAs for nursing apprenticeships, it could lead to some apprenticeships being viewed as 'higher quality' than others, which in turn could lead to some being undervalued by potential employers.

Therefore, we believe that any increase to the number of bodies included in the EPA organisation register must be accompanied by a framework which ensures consistency and rigor in EPA approach across all organisations. Ongoing review and monitoring will be critical and as such, this framework must be accompanied by a robust feedback mechanism that allows for reporting and refining of the process and standards.

Similarly, we also foresee a situation evolving where the existence of multiple EPA organisations creates a competitive commercial environment in which they compete on price rather than consistency and quality. Due to this, we would like to see a standardised fee charged for all EPAs. Auditing this price should be a part of the quality assurance process.

Question 2b: Do you agree with the Institute's proposed criteria for accessing the EQA register of professional/employer-led organisations?

We agree with the proposed criteria and believe it will ensure that high quality is maintained. However, we again emphasise the need for ongoing monitoring and evaluation to ensure that those who have been approved to join the EPA organisations register continue to maintain high practice standards. We believe that issues such as timeliness and uniformity in approach and outcomes will be essential criteria by which to monitor the ongoing performance of organisations.

Question 2c: Does this approach effectively and sufficiently utilise the expertise of professional bodies to assure professional competence?

We broadly agree with the proposed approach to utilising the expertise of professional bodies. However, again, the key to ensuring consistency of outcomes for apprentices, employers and the health and care system will be to ensure that the ongoing performance of professional bodies is measured against a standardised framework.

This framework must be based on contemporary best practice knowledge. The majority of EPA organisations currently require their individual assessors to hold a recognised assessors' qualification alongside set qualifications and occupational competence in the standard being assessed. We believe that this should be standardised across all assessors.

Question 2d: Do you have any suggestions for how this approach could be improved?

As the nursing profession is critical to patient safety, and the nursing apprenticeship role itself is very new, we suggest that the Institute, in conjunction with the NMC and other relevant approved bodies, develops training and resources for all EPA assessors. This is to ensure they and their quality assurers have a shared understanding of the necessary skills to practice safely as either a registered nurse or a nursing associate.

Each education institution will also be subject to overarching educational quality assurance by the Quality Assurance Agency (QAA) and the Office for Students (OfS). It is critical that the review provided by these two organisations provides useful *complementary* quality assurance and not duplication of what the Institute proposes in this consultation. We therefore believe that the Institute should seek to integrate the quality review provided by both of these organisations into any review framework.

About the RCN:

The Royal College of Nursing is the largest professional union of nursing staff in the world, representing 450,000 nursing staff across the UK. The RCN promotes the interests of nurses

and patients on a wide range of issues and helps shape healthcare policy by working closely with the UK Government and other national and international institutions, trade unions, professional bodies and voluntary organisations.

For further information please contact Jonathan Barron, Policy Adviser, on Jonathan.Barron@rcn.org.uk.