

Consultation Response - Regulatory framework for Apprenticeship Assessment - Conditions, requirements and guidance

February 2026

Introduction

The Society for the Environment (SocEnv) defines the standards for professional competence in environmental practice, ensuring key decisions are made by verified professionals. Having received a Royal Charter in 2004, we license professional institutions to award the Chartered Environmentalist (CEnv), Registered Environmental Practitioner (REnvP) and Registered Environmental Technician (REnvTech) professional registrations. There are now over 9,000 registered environmental professionals, sharing a common vision of delivering a sustainable future shaped by environmental professionalism.

We welcome the opportunity to feed into this consultation. This response is formed from our experience in connecting learning, skills and professional registration, by creating clear pathways to professional registration in the environmental sector. More information about our work can be accessed [here](#).

We are more than happy to discuss further and illustrate our key points with more examples and case studies from our extensive network of environmental professionals and partners, from professional bodies to employers.

SocEnv acts as the secretariat for The Environmental Policy Forum (EPF), which is a network of UK-based environmental professional bodies and learned societies promoting environmental sustainability and resilience for the public benefit. Ahead of the UK General Election in 2024 EPF published 'Environmental Priorities for the next UK Government'. Of the x10 priorities, is the call to 'Unlock the enormous social, economic and environmental potential of green jobs and skills'. Please see the [EPF website](#) for more details.

Response

We have chosen to focus on the questions most aligned with our work and expertise.

10. Do you have any comments on the definition of synoptic assessment set out in the proposed assessment requirements relating to assessment?

The inclusion of synoptic assessment is essential to ensure that apprentices are able to demonstrate full occupational competence. The proposed requirements appropriately highlight the need for synoptic assessments to encompass 'an appropriate and substantial proportion of knowledge and skills from the Occupational Standard'.

To strengthen confidence among employers and professional or regulatory bodies, it may be beneficial to provide clearer guidance on the expected proportionality of content drawn from the Occupational Standard. The transition away from assessing all knowledge, skills, and behaviours (KSBs) for every learner has raised concerns about whether full occupational competence can be evidenced consistently.

A well-designed synoptic assessment can play a significant role in addressing these concerns by enabling apprentices to demonstrate integrated, holistic performance across key elements of the occupation.

13. Do you have any comments on the drafting of the proposed purposes for Apprenticeship Assessment?

The proposed shift from assessing all KSBs to requiring assessment organisations to 'provide employers with reliable evidence of the learner's attainment against the relevant knowledge and skills, so they can have confidence that the learner has reached the expected performance standard', raises important questions about how such confidence can be maintained when assessments draw only on a sample of the knowledge and skills.

For many occupations, employers can have full confidence in an apprentice's occupational competence only when all, or at least a very substantial majority of the occupational standard knowledge and skills have been directly assessed.

When assessment is based on a smaller sample, there is a risk that employers may perceive the evidence as less comprehensive than under the current approach, where every apprentice is assessed against the complete set of knowledge, skills, and behaviours. This also has implications for apprentices who move between employers. If different assessment samples are used for different learners, a new employer may reasonably question whether the apprentice's previous assessment fully reflects the specific knowledge and skills required in their own work environment. In such cases, the absence of assurance that the full breadth of occupational competence was assessed may lead to inconsistencies in employer confidence and potentially reduce the portability of apprenticeship achievements.

How this concern is addressed to bring confidence that full, occupational competence is met for every apprentice, is an area that may require care in communication to ensure employers and wider organisations (such as professional bodies) are supportive and engaged.

15. Do you have any comments on the drafting of proposed Condition AA7 (Content)?

With Skills England working in partnership with employers to shape assessment plans for use by assessment organisations, it is imperative that the resulting assessment outcomes are designed in a way that allows coherent groupings of knowledge and skills. Such groupings should maximise the opportunity to evidence full occupational competence for each apprentice, while still operating effectively within the framework of the new sampling methodology.

To maintain rigour and employer confidence, each assessment outcome must contain a sufficiently defined set of mandated knowledge and skills. This will ensure that any sampling plan derived from these outcomes offers adequate breadth and depth of coverage, supporting the consistent assessment of occupational competence across all apprentices.

18. Do you have any comments on the drafting of the proposed guidance on Condition AA3 (Compliance with Assessment Plans)?

The guidance notes that, when determining their approach, assessment organisations must consider 'the need for learners to study any knowledge and skills as a result of the changes.' A key challenge here is that assessment plans and the assessment approaches derived from them, are tied to specific versions of an apprenticeship standard. However, apprenticeship certificates do not currently specify which version of the standard a learner has completed.

This presents significant difficulties for sector bodies and professional or representative organisations. In many occupations, certain versions of an apprenticeship standard meet the requirements for professional

recognition, while other versions of the same standard do not. These differences often arise from changes in mandated elements, such as the required knowledge, skills and behaviours (KSBs) or the inclusion or removal of embedded qualifications.

Given the scale of change introduced by the new assessment plan methodology, it is highly likely that all (or most) existing apprenticeships will move to new version numbers. If apprenticeship certification does not identify the specific version completed, learners may be disadvantaged, particularly in sectors where professional recognition is valued by employers and forms an important outcome of the apprenticeship.

In its current form, the certification process does not provide this level of transparency. The revisions proposed in the new guidance risk compounding this issue, potentially leading to situations where individuals are unable to demonstrate that they have completed the version of the apprenticeship required for professional recognition. It is therefore imperative that certification explicitly confirms the version of the standard achieved to maintain confidence, support professional progression, and protect learners from unintended negative consequences.

19. Do you have any comments on the proposed description of the proportion of synoptic assessment?

As noted earlier in this consultation, the proportionality of knowledge and skills mandated for assessment will have a significant impact on the effectiveness and credibility of the new approach. We have reviewed some of the early assessment plans issued for consultation by Skills England, where approximately 40–50% of the knowledge and skills are designated as mandatory for assessment.

While synoptic assessment is rightly recognised as a strong method for evaluating competence in a holistic and realistic way, the proportionality defined in the current guidance raises important considerations. If around half of the mandated knowledge and skills are assessed, and the synoptic methodology draws on only a proportion of these, the actual assessment coverage could equate to as little as one-fifth of the total knowledge and skills (approximately 20–25%).

This level of sampling may present challenges in assuring employers that apprentices have achieved full occupational competence. Developing assessment approaches that maintain employer confidence, despite substantially reduced coverage, will require careful design, clear rationale, and strong safeguards to ensure that the sampling strategy remains robust, representative, and capable of supporting consistent, high-quality judgements.

22. Do you have any comments on the proposed description of the proportion of marking by the awarding organisation?

As with earlier points raised in this consultation, the sufficiency of assessment undertaken by an organisation independent of training delivery is fundamental to maintaining employer and professional confidence in the confirmation of occupational competence.

Independence in assessment has long been valued by industry as a safeguard ensuring that competence judgments are both objective and robust.

Under the proposed reforms, assessment plans will mandate only a defined proportion of knowledge and skills, and around half of all assessment activity may be carried out by individuals who are not part of the awarding body, albeit under awarding-body oversight and Ofqual quality assurance. This represents a substantial shift from the current model, where assessment organisations directly assess 100% of the required knowledge, skills and behaviours (KSBs).

There is therefore concern that the overall strength and reliability of the assessment could become diluted. This concern is further heightened by behaviours being signed off by the employer rather than being independently assessed. Together, these changes reduce the proportion of the assessment undertaken directly by the awarding body, potentially weakening the assurance currently provided that occupational competence has been fully evidenced.

In this context, employers and professional bodies may question whether the revised approach can consistently provide the level of confidence required to confirm that apprentices are competent to meet workforce needs safely, effectively and in line with sector expectations. Ensuring that the new arrangements continue to deliver rigorous, trusted and occupationally valid assessment will be essential to securing industry confidence and supporting the credibility of apprenticeship outcomes. Therefore guidance that raises the proportionality of the assessment directly assessed by the assessment organisation would be welcomed.