

Apprenticeship Funding Rules 25/26: Webinar 11 June 2025

Clarification points

Initial assessment

We are an employer. How do we manage a situation where the provider is insisting on an IA to meet Ofsted requirements, even though we have made the decision that maths and English are not required?	<p>The initial assessment is vital and necessary for all apprentices and it's not just about English and maths provision. It also checks the learner's eligibility for funding, programme eligibility (after accounting for all relevant prior learning) and learning support needs. Even in relation to English and maths for 19+ learners, the IA will be used to document this discussion / decision.</p> <p>IA is also an important vehicle in which to discuss a number of generic areas of the programme, such as how all parties will work together to achieve the apprenticeship (i.e. roles and responsibilities of the provider, employer, and apprentice) and the price of the apprenticeship.</p>
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Recognition of prior learning

When calculating RPL, is the reduction in funding based on the percentage reduction of hours against the published OTJT minimum or against the planned hours of the provider?	There is no change to RPL; providers should continue to apply RPL to their own planned hours. The OTJT minimum is just there as a compliance check (i.e. is your starting point (for a non-RPL learner) at least equal to or above the new OTJT minimum requirement).
I understand that the minimum OTJT figure can only be reduced for RPL but how would we determine how much to reduce this by?	This will depend on how much content you think can be removed from the apprentice's training plan due to their prior learning.
Can RPL now take an apprentice below 278 hours?	Yes, from 1 August 2025 RPL can now reduce a programme to 187 hours. Anything below 187 hours would be a non-compliant programme.

Where an apprentice has RPL and the provider's planned hours exceed the new OTJT hours, would the minimum hours required for gateway be based upon the standard hours minus RPL? E.g. if provider training plan (after RPL) = 1000, OTJT minimum hours = 900, and RPL = 100hrs, would the minimum OTJT for gateway be 800hrs?	Yes, in this example we assume the provider starting point is 1100 hours for a non-RPL learner. So 100 hours of RPL would provide planned hours of 1000. If the OTJT minimum was 900 hours RPL of 100 would take this to 800 which would be the minimum expectation from a compliance POV.
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English and maths

Some providers use the terms initial assessment and diagnostic assessment differently. Does this mean that those who opt out of English and / or maths or those that don't need to complete it, don't need to do any initial assessment tests at all?	Clarification to be added in V2 of the rules to change wording or references to diagnostic testing to include 'all forms of assessment'.
If there are any changes to the way in which English and / or maths active learning will be delivered whilst the apprentice is on programme, how should this be recorded on the training plan?	If there are any changes to the model of delivery described in the training plan at the start of the programme, whilst the apprentice is on programme, the training plan must be updated. If this means that there is a key impact on the hours that employers need to release apprentices for, the training plan must be updated and re-signed by the provider, employer and apprentice at the earliest opportunity to ensure that the provider remains compliant with the rules. English and maths funding should only be claimed for the months in which English and / or maths training has been delivered.

Minimum duration

What is the justification that's required for learners having shorter durations (e.g. the normal duration is 14 months but we / the employer wants to reduce this to 10 months, what justification is needed)?	You don't need to justify this to DfE. Provided the minimum duration and OTJT rules are met you / the employer can structure the programme as you see fit. Clearly if you are going to compress a 14 month programme into 10 months this will impact how often the employer will need to release their apprentice.
Does the minimum duration changing to 8 months apply to new starts only or also existing learners who can complete in less than 12 months?	The change is only for new starts from 1 August 2025. It does not include existing learners, restarts and those that come back from a break in learning.
For the 8 month minimum duration the ILR validation rules are set at 242 days. However, depending on which month learners are enrolled the minimum could translate to 245 days. Is the minimum duration 8 calendar months or 242 days?	Legally the minimum duration is 8 calendar months, in the same way that it's 12 calendar months now. However, 8 months can be anything from 242-245 days depending on the start date, which is why set the ILR validation at 242 days (if we had set it at 245 days it would have stopped some learners from completing).

Off-the-job training (OTJT)

Will the list of standards that have a transition arrangement be published?	We will re-publish Annex C mid-July with confirmed transition arrangements. In the meantime we will feed back to individual providers (who have raised queries on the standard) and copy in AELP / AOC / UVAC. FE Week will also be sent the transition list.
Which document are the OTJT examples in, I can't see Annex C in the funding rules? How often will these be reviewed?	We have published the OTJT requirements (Annex C) as a separate document as it will need to be updated more frequently than the main rules (i.e. every time we approve a batch of new / revised standards). You can find this on the Funding Rules 25/26 page – it's the 3 rd document on this page.

	We expect that once we have agreed transition arrangements for standards we would only revisit the OTJT requirements for a standard as part of a BAU revision process and any change would be clearly linked to a new version.
What happens if there is an apprenticeship that isn't on Annex C, who do we contact?	Currently we have only included standards that are approved for delivery. However we understand the value of including standards in development so will discuss this with SE colleagues; it will depend how far through the development process a standard is (i.e. have OTJT hours been decided).
Was the funding band considered to inform the minimum OTJT hours?	No; for this we primarily used provider data (actual hours – median delivery) from the R14 23/24 ILR.
Will the OTJT hours still be based on a 20% calculation?	No, this is the point of moving to a published minimum for each standard. Providers will no longer need to calculate the 20% minimum at learner level based on the learner's duration. Instead the compliance measure will sit at standard level.
Some professional bodies (e.g. NMC) have minimum hours for theory. However the nursing standard OTJT requirement is considerably below the requirements of the NMC.	The OTJT minimum is a replacement for the 20% calculation and is for apprenticeship compliance purposes only. If there are additional requirements on a standard / sector then these need to be handled separately (as now). Right now it's possible that the current minimum 20% doesn't match NMC requirements either (given that the 20% is based on duration).
The OTJT for the electrical standard is now more than before (equivalent to 48 months rather than the 42 month typical duration). Is this an error?	The OTJT minimum requirement was set below what providers are currently delivering. A lot of standards have more than 20% OTJT built into them at the design stage and this could be one of them. This would explain the difference.
For RPL / OTJT calculations, should the actual programme hours be used for the calculation or the new minimum hours (e.g. where actual programme hours are more than the new minimum).	Providers should continue to use their own planned hours and (as now) this means planned hours for the same standard could be different between providers. The only additional thing that providers need to check is that their planned hours for a non-RPL learner (i.e their starting point for RPL) meets the new OTJT minimum requirement.

From August, do we declare the new minimum OTJT hours figure on training plan and ILR, even if we deliver more OTJ hours as part of the planned programme?	Providers should continue to declare their own planned hours and actual hours (as they do now) on all documentation. The OTJT minimum requirement is simply an additional compliance check. This should only be used if this is what you actually plan to deliver.
If we plan for 800 OTJT on the training plan and standard's minimum is 466, and the learner completes with 600 OTJT hours, is this acceptable?	From a compliance point of view yes, although we would still be interested why there is a 200 hour difference between planned and actual hours. For this reason we are going to add back in (to V2 of the 25/26 funding rules) the requirement for the employer statement where there is a difference. We took this requirement out, but in retrospect (given some of the questions we are being asked) we now think that the employer should continue to confirm that they are content with the training their apprentice has received.
When will the OTJT guidance, training plan and apprenticeship agreement templates be updated?	<p>The OTJT guidance currently on gov.uk is still useful for the current policy. We will consider whether a similar guide is needed for the new policy.</p> <p>The apprenticeship agreement and training plan will be updated as soon as possible; minor changes are needed in relation to the minimum duration and OTJT changes. We will also update the RPL guidance.</p>
With regards to the OTJT look-up table, it looks like this is based on an apprentice working 30 hours a week. If an apprentice works 35 hours a week (or 37.5 hours) do the calculations change?	We don't plan on changing the look-up table; we used 30 hours as that's what the OTJT policy is currently based on (for a full-time learner). If a provider wants to further adapt the look-up table for their own use that's fine. Remember that all OTJT must take place within working hours.
In the webinar you said the look up table shows various delivery models, some being more than 6 hours per week, including block and front loaded delivery. Can you please clarify this?	The look-up table does not include front loading or block release as everyone's models will be different; the table only shows linear delivery e.g. where the same volume of training is delivered each week. The intent of the table is to show how the same programme could be delivered across different durations and is just a guide.

Re the delivery flexibility change how that would work in practice? Does this just mean the minimum hours apply regardless of time on programme or does it have further impact?	Right now from a compliance point of view if a learner is on programme for 12 months our audit team would expect to see a minimum of 278 hours of evidenced training and for 15 months this would be 348 hours (i.e. the OTJT requirement increases /decreases in line with an increase / decrease in the duration). From August this will no longer be the case; the duration can increase / decrease without any impact on the OTJT hours that will be required.
Will the change to linking OTJT to duration be removed for current learners?	No, as with a lot of policy changes, this change is only for new starts from 1 August 2025.
How does the active learning rule fit with the fact that OTJT is no longer linked to duration?	The active learning rule is separate. We would still expect to see evidence of learning each month (or each quarter for some models).
If a programme is delivered over a longer period, with shorter weekly OTJT hours per week, do employers still need to give the employee 20% off a week?	This is for the provider and employer to discuss. How often the employer releases the apprentice for OTJT will depend on how a provider structures their programme. They may decide to keep with the average 6 hours per week (which is fine), in which case how they talk to an employer about releasing employees will not change. For some providers (those with front loading / block delivery) the current narrative of 20% / 6 hrs per week may not make sense.
How we talk about OTJT with line managers to engage them, being able to talk about 20% (or 6 hours a week) was simpler.	From a programme point of view we will now describe the fact that each standard has a minimum OTJT requirement (rather than each learner having a minimum entitlement). This will fit better with the variety of delivery models that we have.
If a learner is part time for all or part of their apprenticeship, can they now complete in the same timeframe as a full time worker, provided the minimum OTJT hours are met?	They can now. The current extension for part-time apprentices is for funding purposes only, so that monthly payments are lower for this cohort over a longer period. If the part time apprentice achieves before their planned end date the residual funding is paid as part of the final payment.

Can current part time apprentices and any who join before 1st August benefit from the change or are they locked at 20% OTJT and an extended duration?	The change for part-time apprentices is only for new starts from 1 August 2025.
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Additional payments / care leaver bursary

Could you please provide further clarification regarding the change to the final instalment? Why is this only for foundation and shorter apprenticeships (where the published typical duration is less than 12 months)?	<p>For new starts from 1 August 2025, the final instalment of the additional payment will be paid early (at day 242) for apprentices completing a foundation apprenticeship or an apprenticeship which has a published typical duration of less than 12 months (as identified on the standard on the Skills England website). This ensures the provider, employer or apprentice does not miss out on receiving the full additional payment when the apprenticeship is being completed within the expected timescale.</p> <p>If the apprentice is on an apprenticeship standard where the published typical duration is 12 months or more, but they complete their apprenticeship in less than 12 months, then this final instalment will not be made.</p> <p>Employers may identify apprenticeship standards that are already in use where full occupational competence could be delivered in under 12 months and look to revise the standard appropriately. We will continue to work with Skills England to identify where full occupational competence can be delivered in less than 12 months for apprenticeships in high-priority areas.</p>
Is there any additional guidance available for the care leaver bursary?	Our published guidance can be found here: Apprenticeships care leavers' bursary guidance - GOV.UK

End-point assessment (EPA)

<p>EPA reform was much needed as my current EPA is a duplication of what our apprentices are already tested on throughout their course by a regulated body. Our EPAO has had to pay for consultants to run the EPA and test our apprentices on the same things that they have already been tested on.</p> <p>Linked Q: Will PGTA need to have rigorous EPA as well as assessment for QTS or QTS with PGCE?</p>	<p>We have improved our approach to reducing duplication between qualifications apprentices take on programme with a more integrated approach to end point assessment. The new reforms will take this further by removing duplication. Where mandatory qualifications cover all of the knowledge and skills statements, there may not be any need for an additional assessment.</p>
<p>Will there be a priority for the revision work due to those that have regulated qualifications as we are disadvantaging our learners and wasting time and money in this current process?</p> <p>Linked Q: Highest volume first is not right it should be around those that have current regulated qualifications in them, disappointed in that as it does disadvantage the learners.</p>	<p>Skills England and DfE are agreeing the prioritisation of standards based on a number of priority factors, including high volume apprenticeships, those serving growth sectors and those that align with the Government's Industrial Strategy. We will also consider regulated occupations as part of this prioritisation. We are aiming for all standards to be updated by August 2026.</p>
<p>At what point do employers need to acknowledge their responsibility for behavioural checks against the standards. If behaviour is being assessed solely by the employer, will (i.e.) the interview segment of the EPA still include behavioural questions or just knowledge and skills?</p>	<p>The employer will be responsible for verifying that each behaviour statement has been sufficiently demonstrated by the apprentice over the course of the programme. This must have taken place before the assessment organisation can request a certificate.</p> <p>Apprenticeship assessments developed and delivered by assessment organisations will not be required to assess behaviours. Skills England will provide further guidance on verification of behaviours soon.</p>

Will existing learners be able to take the new assessments or is the only for learners who start after the AO is ready to deliver the new assessment?	Further information will be provided on the transition arrangements in due course.
<p>When will the new arrangements for EPA be finalised as this is holding up the development and review of standards.</p> <p>Linked Q When are changes to EPA expected to be 'ready to go' and revisions to assessment plans happen?</p>	<p>This is a significant change and Skills England is currently developing and testing its approach to implementing the reforms. We expect this work to be completed this Summer ahead of full implementation. We expect all apprenticeship assessments to be updated by August 2026.</p>
If an apprentice starts on programme after August 25, but before the standard has been revised in terms of EPA, can any assessment changes be applied.	Further information will be provided on the transition arrangements in due course.
Do the EPA assessment reforms apply to new starts for 25/26 or those who will be undertaking EPA in 25/26?	Further information will be provided on the transition arrangements in due course.
So EPA is no longer going to be a competency check after gateway but a series of employer assessments, provider assessments and then the EPAO acting as a quality assurance body?	Apprenticeship assessments designed and delivered by assessment organisations will continue to provide a robust assessment of occupational competence. However, we are reforming the approach to make it more flexible and efficient. We believe that employers are best placed to verify behaviours. Where appropriate some assessment may take place on programme or be centre assessed.
What quality assurance process will be in place to ensure assessment is moderated and standardised	Assessment organisations will develop detailed specifications and assessments based on the contents of Skills England's Assessment Plan and

between assessment organisations? Which body (e.g. Ofqual / Skills England) will be responsible for this standardisation? This is critical given the new broader assessment plans	in line with other general requirements, including regulation by Ofqual, OFS or quality assurance through an EQA Provider.
If the assessment plan is changed for a standard, will this apply to existing cohorts or for new learners starting on programme only	Further information will be provided on the transition arrangements in due course.
Since the dissolution of IfATE, the revision to standards report has ceased. As there is so much change how will we find out when new assessment plans are due. We're trying to create training plans to go live from September, but we may have to double handle this task where changes are made over the summer, which is a huge drain on resource.	We recognise that these reforms will impact providers, employers and assessment organisations. We are working closely with Skills England and will provide information to the market as soon as possible.
In relation to EPA transition period, if assessment plans are updated over the Summer, what will be the time period for implementation as we don't want to have to replan if it's not necessary?	<p>We are currently testing the approach on five standards:</p> <ul style="list-style-type: none"> • Adult Care Worker • Carpentry and joinery • Data technician • Assistant accountant • Early Years Educator <p>We expect this work to be complete this Summer ahead of full implementation. Further information will be provided on the transition arrangements in due course.</p>
Will the 20% EPA maximum charge per apprenticeship be reduced for an apprenticeship where a substantial amount of the EPA	Where there is on programme assessment which the provider undertakes, providers and assessment organisations will continue to negotiate a fair price in accordance with the agreed delivery arrangements and apprenticeship

assessments reverts to the provider rather than EPAO? Can employers be paid for any part of the end point assessment?	funding rules. As is the case now employers cannot claim for any assessment costs.
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Foundation apprenticeships

Can you clarify what payments employers will receive and whether there are any restrictions on what these can be used for?	<p>The £1,000 additional payment for employers (and providers) is for any eligible apprentice undertaking any apprenticeship. The employer incentive payment (up to £2,000) is payable for eligible foundation apprenticeships (as identified on the standard on the Skills England website). This is paid on top of the £1,000 additional payment.</p> <p>These payments have to be spent on the learner who triggered the payment; however, we do not specify in the funding rules what it must be spent on. It is supplementary to the negotiated price and therefore not impacted by the eligible and ineligible costs rules. It should be used on costs to support the apprentice's training and therefore we expect it to cover things such as travel costs, materials or personal support.</p>
Upon completion of a foundation apprenticeship, if the individual moves onto another apprenticeship will they be eligible for the additional payments again?	<p>With regards to the £1,000 additional payment (for employers and providers), when moving onto another apprenticeship then this would be classed as a new start on a new programme so if the learner still meets the eligibility criteria they would qualify for this payment again.</p> <p><u>To note:</u> the employer incentive payments are only paid for the first foundation apprenticeship.</p>
If a learner needs all the guided learning hours for English and maths, on top of the OTJT hours, then they are unlikely to be able to complete within 8 months,	In line with wider apprenticeships the minimum duration of foundation apprenticeships will be 8 months, however this may be longer to accommodate individual learner needs (noting that not all foundation apprentices will need to study English and / or maths).

The OTJT hours for foundation apprenticeships aren't currently on Annex C. When will these be updated?	Due to publication timings, we were unable to include these on the original Annex C spreadsheet. These will be included when we publish an updated Annex C in July.

Employer co-investment

<p>If a learner who started their apprenticeship prior to 1 April 2024, but is currently 16-18 years old, changes employer then why does the new employer (who doesn't pay the levy) need to pay the employer co-investment?</p>	<p>The policy on who is eligible for the employer co-investment waiver changed on 1 April 2024; meaning the previous waiver which was determined by apprentice age and size of employer (i.e. number of employees) no longer exists. Therefore, only starts that occurred prior to this date who remain with their current employer are eligible for this waiver. The new criteria, for the co-investment waiver, is only applicable for new starts from 1 April 2024.</p> <p>Where an apprentice changes employer and remains on the same apprenticeship, this is classed as a continuous learner (even if there is a break between leaving their original employer and starting with their new employer); it is not classed as a 'new' start. When determining eligibility for the co-investment waiver we will look at the original start date of the apprenticeship training. Therefore, if the apprenticeship training started prior to 1 April 2024, then no co-investment waiver will be applied, and the new employer will be liable to pay co-investment.</p>
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Annex A

Can you confirm that the pre-settled status change is with immediate effect?	The clarification of the rules in relation to the EUSS scheme is effective immediately. Those with pre-settled status through the EU Settlement Scheme are eligible for funding (as their pre-settled status is automatically extended by the Home Office and it will not expire). They must meet the other eligibility criteria, including having lived continuously in the EEA, Switzerland, Gibraltar, or the UK for at least the previous 3 years on the first day of their apprenticeship.
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Other themes

Growth and Skills Levy flexibility	We will go further by introducing short courses in England, funded through the Growth and Skills Levy, in areas such as digital, artificial intelligence and engineering. These will support Industrial Strategy sectors such as in Creative Industries and Advanced Manufacturing from April 2026. We will work with Skills England to determine the courses which will be prioritised in the first wave of rollout and subsequent waves, and how those sit alongside apprenticeships and other training routes. We will work with Skills England to introduce these short courses and consider how to prioritise investment across the programme.
Defunding of Level 7 apprenticeships	This government has a driving mission to break down barriers to opportunity. That's why we'll be asking more employers to invest in upskilling their staff aged over 22 to this level, to enable levy funding to be re-balanced towards young people and training at lower levels. We will continue to fund level 7 for those aged 16-21 (when they start their apprenticeship training) and support apprentices already on a level 7 apprenticeship through to completion. This change will apply from January 2026 across all sectors.