

Ofsted  
Piccadilly Gate  
Store Street  
Manchester  
M1 2WD

[complaints@ofsted.gov.uk](mailto:complaints@ofsted.gov.uk)  
[enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)  
[www.gov.uk/ofsted](http://www.gov.uk/ofsted)



16 June 2023

our ref: CAO-003412

Please quote this reference

Miss Rosalind Harrison  
By email to: [r.harrison@ahpo.net](mailto:r.harrison@ahpo.net)

Dear Miss Harrison

### **Complaint about the inspection of The Association of Health Professions in Ophthalmology from 21 to 23 March 2023**

I am writing in response to your online complaint form of 22 May 2023 regarding the inspection of your apprenticeship provision from 21 to 23 March 2023.

In line with Ofsted's published complaints policy, where appropriate, your concerns have been linked for conciseness and clarity under the main headings below. Please be assured that, while I may not have referred specifically to all the concerns you raise in my response to you, they have all been considered. In considering your concerns, this has included a review of the inspection evidence, the inspection report, the report review process, the further education and skills inspection handbook and the education inspection framework.

#### **1: Your concerns about the inspection findings and the inspection report**

##### **1.1** You raise concerns about the statement in the inspection report:

'However, the curriculum has not been designed to help them develop knowledge, skills, and behaviours beyond those that they had when they started the apprenticeship.'

You state:

'There is no evidence to support the assertion that the curriculum has not been designed to help [learners] develop knowledge, skills and behaviours beyond those that they had when they started the apprenticeship.'

A thorough review of the inspection evidence has found that apprentices already had significant experience of working as ophthalmic technicians, often for many years; some as senior technicians. Although the evidence identifies that a few apprentices improve their knowledge of current practices and learn about the rationale for why they carry out activities in their roles, others state that the knowledge aspect of their apprenticeship is what they already knew for their job roles.

I can confirm that this statement is an accurate reflection of the evidence and the inspectors' findings.

This aspect of your complaint is not upheld.

##### **1.2** You raise concerns about the statement in the inspection report:

'However, for too many apprentices, particularly those for whom English is an additional language, they state that the volume and frequency of written assessment is too great, and they become demotivated over time.'

You state that there are four apprentices on your programme for whom English was a second language and that all are making good progress.

An examination of the evidence shows that inspectors identified a consistent concern that the workload for assessment was heavy and that apprentices found this workload overwhelming. Those apprentices for whom English was a second language remained on track because they used their own time (evenings and weekends) and sought their own support to cope with their additional language needs.

I can confirm that the text in the report accurately reflects the evidence.

This aspect of your complaint is not upheld.

**1.3** You raise concerns about the statement in the inspection report:

'However, too much reliance is placed on work-based support and independent learning as opposed to a clearly planned and sequenced curriculum which is taught effectively. Assessors do not meet with apprentices frequently enough to support their learning.'

You state that 'the learning and teaching approach for this course is independent learning, as is stated in the course specification'. In your response, you list learning outcomes from the mandatory unit 1 in relation to independent learning and refer to assessment plans 'that are incorporated in the portfolio' and state that 'in unit learning and assessment guides detail the sources of information and the work the learner needs to complete'.

A review of the evidence confirms that apprentices carry out independent learning and seek clarification through their workplace mentors. Apprentices' interaction with assessors relates predominantly to verbal feedback following an assignment submission. Inspectors rightly judged that this was not sufficient to support apprentices to build their knowledge and to apply that knowledge as skills. Furthermore, inspectors separately carried out work scrutiny of apprentices' reviews. In those sampled, most had not received a review recently.

I appreciate your full explanation of how you deliver your apprenticeships. However, the evidence clearly shows that apprentices do not receive sufficient guidance and support from assessors to develop the substantial knowledge, skills and behaviours required for an apprenticeship.

This aspect of your complaint is not upheld.

**1.4** You raise concerns about the statement in the inspection report:

'Leaders do not ensure that the principles and requirements of an apprenticeship are met. Apprentices do not develop substantial new knowledge, skills, and behaviours as many have worked in the sector as

ophthalmic technicians for more than 5 years. The knowledge that they do acquire is not sufficient to be claiming public funds for an apprenticeship and is more akin to continuous professional development (CPD) activities that should be funded by their employer.'

You state that 'the fact that apprentices have worked in the sector does not mean that they have well-developed knowledge, skills and behaviours in the areas of knowledge and practice'. A review of the evidence confirms that apprentices told inspectors that they already had most of the knowledge, skills and behaviours required to achieve the apprenticeship. Please refer to paragraph 224 of the further education and skills inspection handbook. The evidence demonstrates that the apprenticeships do not meet the principles and requirements of an apprenticeship, as detailed in this section of the handbook.

I am sorry you feel that this statement is not an accurate reflection of your provision. However, the evidence unequivocally supports the inspectors' findings.

This aspect of your complaint is not upheld.

**1.5** You raise concerns about the statement in the inspection report:

'Leaders ensure that the taught curriculum is logically sequenced, allowing those who have been out of education for some time to start with a focus on study skills before moving on to vocational knowledge, which underpins work in an ophthalmic clinic.'

You are of the view that this contradicts the statement in paragraph 3 that the curriculum is not clearly planned and sequenced.

Following a thorough review of the evidence, I can confirm that this paragraph in the report relates to the diploma qualification only. Inspectors' evidence shows that they identified some logic to curriculum sequencing for the diploma qualification. They found that the foundation skills such as health and safety, study skills (plagiarism and Harvard referencing), and communication skills were planned for the beginning of the course. More complex content, such as the science, was left until later. The evidence shows that there was no link between the delivery of units of the qualification and a curriculum for delivering the broader apprenticeship standard, including planning for and sequencing on- and off-the-job training.

This aspect of your complaint is not upheld. However, I have amended the report to clarify the term 'taught curriculum'. The report now reads:

'Leaders ensure that the taught curriculum for the embedded diploma qualification is logically sequenced, allowing those who have been out of education for some time to start with a focus on study skills before moving on to vocational knowledge, which underpins work in an ophthalmic clinic.'

**1.6** You raise concerns about the statement in the inspection report:

'Leaders have not created effective assessments that link to the apprenticeship. On too many occasions, apprentices are asked to complete additional work which increases their already high workload and causes

anxiety. For example, they complete additional assignments that are not required for their apprenticeship, when they already have the skills.'

I respectfully acknowledge your detailed comments relating to this paragraph. However, the evidence shows that leaders did not understand the requirements of an apprenticeship programme. They referred to the requirements being covered by the mandatory units of the diploma. Inspectors' evidence demonstrates how they tried to help leaders to provide the evidence that they were looking for by rephrasing questions and reading from the apprenticeship standard.

Inspectors' evidence demonstrates that they did not find witness statements and the assessment outcomes effective enough to show clearly what knowledge, skills and behaviours apprentices had developed, as required for their apprenticeship. Inspectors found that skills scans were focused on the units for the diploma and not on the knowledge, skills and behaviours required in the apprenticeship standard. Inspectors identified that skills scans did not take into account apprentices' prior learning or experience. Consequently, they were not used to plan learning to meet individual needs.

Evidence recorded from discussions with apprentices confirms that apprentices questioned whether all aspects of the diploma needed to be assessed separately and whether some elements could be combined. Apprentices told inspectors that there was an over reliance on written assessment which they found overwhelming and led to a few of them falling behind.

I am sorry that you feel that this paragraph is not representative of your provision. However, inspectors' evidence is compelling and supports this finding fully.

This aspect of your complaint is not upheld.

**1.7** You raise concerns about the statement in the inspection report:

'Apprentices do not receive any teaching as part of their apprenticeship, and they learn very little. Apprentices are provided with learning resources to study, and they subsequently pass, due to their extensive experience and knowledge of the sector.'

I appreciate that you believe that apprentices are being trained to become independent learners. Ofsted does not prescribe preferred methods for teaching or training. However, please refer to paragraphs 224 and 227 of the further education and skills handbook. One of the aspects that inspectors consider is:

'The way that teachers teach and assess to support learners to build their knowledge and to apply that knowledge as skills'.

(Paragraph 227)

For apprenticeships, inspectors:

'Will judge how well trainers, assessors, coaches and mentors communicate up-to-date vocational and technical subject knowledge that reflects expected industry practice and meets employers' needs. Inspectors will determine

whether apprentices acquire that knowledge effectively so that they demonstrate the required skills and behaviours that enable them to complete their apprenticeships ....'

(Paragraph 224)

The evidence shows that inspectors recorded their concern about a lack of teaching and training throughout the three days of the inspection. Inspectors recorded that apprentices could remember very little of what they had read in their eBooks and much of what they knew was because they already had the knowledge from their job roles.

I can confirm that inspectors correctly identified weaknesses in the delivery of the apprenticeship programme.

This aspect of your complaint is not upheld.

**1.8** You raise concerns about the statement in the inspection report:

'Assessors do not meet with all apprentices regularly enough. For some apprentices, the gap between progress reviews is too long. Progress reviews are too brief and place a disproportionate focus on assessment completion as opposed to developing the knowledge, skills, and behaviours that they need to make a greater contribution at work. Too many apprentices do not benefit from enough assessor support to make the rapid progress of which they are capable. For example, a few apprentices have not spoken to their assessors in over seven months.'

Throughout the inspection, inspectors raised their concerns about the lack of contact that apprentices had with assessors. The evidence shows that apprentices did not receive regular reviews and that the gaps between reviews were too long. I acknowledge that you are planning to improve how you monitor the review process and I thank you for sharing this. I also acknowledge that you believe there to be only one apprentice who did not receive a review within three months. However, inspectors' evidence strongly disputes this view.

In the progress reviews sampled, inspectors identified that assessors did not consider what new knowledge, skills and behaviours apprentices had developed since their last meeting. Their focus was on unit completion for the diploma qualification. Too few progress reviews involved the workplace mentor. Consequently, there was little employer contribution to how effectively apprentices applied their knowledge, skills and behaviours in the workplace.

This aspect of your complaint is not upheld.

**1.9** You share your own concerns regarding the statement in the inspection report:

'Leaders do not ensure that employers and workplace mentors attend apprentices' progress reviews regularly. In too many cases, employers are not involved in the planning of learning to create opportunities for apprentices to practise the knowledge and skills they are learning. The provider does not effectively support workplace mentors to understand their role in supporting

apprentices at work. As a result, the quality of on- and off-the-job learning is inconsistent and depends on the workplace mentors' enthusiasm, availability and understanding of the apprenticeship.'

Thank you for sharing your own concerns about the lack of employer representation at progress review meetings. Although we acknowledge that it can be challenging to ensure that employers attend these meetings, it is essential to ensure that apprentices are fully supported by their employer. Inspectors' evidence shows that most reviews took place without employer representation.

**1.10** You raise concerns about the statement in the inspection report:

'Apprentices who speak English as an additional language and those who require English and mathematics functional skills to complete their apprenticeship are not offered enough support to help them achieve their apprenticeship. Leaders and assessors do not ensure that apprentices complete English and mathematics skills assessments at the start of their apprenticeship to identify gaps in their knowledge. Many apprentices seek additional English support from their colleagues and families and attend classes at other providers to support them in completing their assessments. These apprentices do not make the rapid progress they are capable of.'

You state that you cannot insist that employers ensure apprentices attain level 2 mathematics and English prior to the apprenticeship and that you subcontract this work to an external training provider where apprentices have not achieved these qualifications. However, the evidence shows that inspectors judged that leaders and assessors did not ensure that any gaps in apprentices' English and mathematical skills were identified or rectified to help apprentices to develop the skills required for their next steps or future aspirations. This was particularly notable for those for whom English was a second language.

The evidence shows that these apprentices felt overwhelmed by the volume of work required of them. Inspectors recorded that there was no additional time given to help English for Speakers of Other Languages (ESOL) apprentices with their English needs and that they relied on family members for support. Under the education inspection framework (EIF), inspectors will always judge how effectively learners and apprentices develop their English and mathematical skills regardless of their entry points.

This paragraph is an accurate reflection of inspectors' findings.

This aspect of your complaint is not upheld.

**1.11** You raise concerns about the statement in the inspection report:

'Leaders and assessors do not make appropriate use of apprentices' prior learning and experience to plan a challenging curriculum. Most apprentices have worked for many years in ophthalmic technician roles, but this is not considered when planning their learning. Although apprentices are successful at end-point assessment this is due to their extensive experience prior to them starting the apprenticeship.'

The evidence is very clear about apprentices already having substantial experience in their roles as ophthalmic technicians, some at a senior level. Evidence from interviews with apprentices and their employers also confirms that provider staff did not use apprentices' prior knowledge and experience to plan a challenging curriculum. Apprentices confirmed that they already had the vast majority of knowledge provided through the diploma qualification. Evidence previously analysed in this response above demonstrates clearly that skills scans do not identify effectively what apprentices already know and can do. Inspectors judged that a number of apprentices and employers use the apprenticeship to accredit existing knowledge, skills and behaviours.

The evidence is compelling and reflects this finding fully.

This aspect of your complaint is not upheld.

**1.12** You raise concerns about the statement in the inspection report:

'Leaders have not planned or taught a personal development curriculum as part of the apprenticeship. While apprentices complete reflective assessments on mental health, they do not have the opportunity to discuss this further.'

You list a series of references to learning outcomes in units 1, 2, 6 and 10 of the qualification that you believe relate to a personal development curriculum. However, inspectors recorded that they could find no evidence of wider curriculum content being delivered. There is evidence that, during a curriculum intent and implementation meeting with an inspector, leaders agreed that they needed to extend their coverage of wider topics such as those in a personal development curriculum, behaviour and attitudes and safeguarding. Evidence states that there is an assumption by leaders that apprentices, as adults, will already have the knowledge needed.

The evidence refers frequently to reflective logs that apprentices complete. However, inspectors recorded that the purpose of these and their usefulness was variable and that they were not routinely discussed in progress review meetings. On their own, these do not represent a clearly defined personal development curriculum.

I acknowledge your references to what you believe to be a personal development curriculum. However, inspectors' evidence is clear that there is no identified personal development curriculum.

This aspect of your complaint is not upheld.

**1.13** You raise concerns about the statement in the inspection report:

'They discuss fundamental British values within the context of their work but have no wider understanding of areas such as democracy or the rule of law. As a result, apprentices do not develop their broader understanding of life in modern Britain throughout their apprenticeship.'

Inspectors' evidence shows that they asked a variety of stakeholders – apprentices, employers, provider staff and leaders – about fundamental British values. From

these discussions, inspectors judged that assessors do not prepare apprentices sufficiently enough for life in modern Britain. The evidence states that assessors feel that their apprentices do not need this, as they are motivated adults.

Inspectors recorded that apprentices discuss fundamental British values and write about ethics in an assignment, but that they do not discuss specific values such as the rule of law and democracy. As mentioned above, inspectors found that assessors did not discuss apprentices' reflective reviews routinely with them. All inspectors will consider fundamental British values under the EIF. Paragraph 266 of the further education and skills handbook states that 'the judgement focuses on the most significant dimension of the personal development of learners that our education system has agreed, either by consensus or statute'. The second point under this heading is 'developing and deepening learners' understanding of the fundamental British values of democracy, individual liberty, the rule of law and mutual respect and tolerance'.

These values apply to all learners and apprentices in all providers inspected under the EIF. I am sorry that you were concerned that there may have been racist assumptions. I should like to reassure you that there is no racist inference at all.

This aspect of your complaint is not upheld.

**1.14** You raise concerns about the statement in the inspection report:

'Leaders do not ensure that apprentices receive any careers education, information, advice or guidance. Too many apprentices do not have a clear understanding of the opportunities available to them once they have completed their apprenticeship.'

The evidence shows that apprentices had not received any careers education, information, advice or guidance. There were comments relating to apprentices understanding that they can join a professional association on completion of their apprenticeship and that this is an official registration akin to that of the nursing profession. The evidence also shows that apprentices referred to an assignment on careers that presumably links to your comments relating to career opportunities in unit 10. However, there was no follow up to this afterwards. In other instances, apprentices see the level 5 course as their next step. The evidence does not contain any reference to apprentices receiving impartial or independent careers advice.

It is clear from the evidence that apprentices do not receive the careers education, information, advice and guidance that they should.

This aspect of your complaint is not upheld.

**1.15** You raise concerns about the statement in the inspection report:

'A few apprentices are not interested in progression but are focused on gaining the accredited qualification incorporated into the apprenticeship that demonstrates their prior skills and will give them UK certification.'



As previously mentioned, the inspectors recorded that a number of apprentices and employers stated that they use the apprenticeship to accredit existing knowledge, skills and behaviours and to apply for professional registration.

This aspect of your complaint is not upheld. However, to avoid any ambiguity, I have removed the term 'UK' from this paragraph and inserted the word 'professional' to clarify that the paragraph relates to the professional certification and apprentices in general, not non-UK citizens.

**1.16** You raise concerns about the statement in the inspection report:

'Leaders have recruited highly knowledgeable and experienced practitioners as assessors. However, they do not encourage or support assessors to complete CPD related to their teaching practice. As a result, apprentices do not benefit from effective design and assessment of the curriculum to help them learn.'

The evidence shows that this paragraph relates to leaders not providing assessors with training or development in relation to the development of their craft of teaching, including teaching online. However, the evidence also shows that leaders do encourage assessors to keep their professional sector knowledge current and up to date with relevant continual professional development activities (CPD).

This aspect of your complaint is not upheld as the judgement relates to lack of CPD for teaching practice. However, for clarity and to acknowledge that leaders encourage assessors to keep up to date with industry practices, I have amended this paragraph to read:

'Leaders have recruited highly knowledgeable and experienced practitioners as assessors. Leaders encourage assessors to keep up to date with current sector practices. However, they do not encourage or support assessors to complete CPD related to their teaching practice. As a result, apprentices do not benefit from effective design and assessment of the curriculum to help them learn.'

**1.17** You raise concerns about the statement in the inspection report:

'Leaders do not ensure that they have a quality assurance process that extends beyond the requirements of the awarding organisation. They do not routinely gather or use data effectively to identify the strengths and weaknesses of the apprenticeships that they provide, for example using attendance data to identify when assessor reviews have been missed. Those responsible for governance do not have sufficient information to be able to hold leaders to account and improve the quality of training that apprentices receive.'

The record of a discussion between the lead inspector and the nominee demonstrates that leaders did not have a well-defined approach to quality improvement. Given the clearly documented concerns across the inspection teams' evidence, leaders were unaware of the poor quality of education that their apprentices received.

The evidence shows that leaders do not provide those responsible for governance with sufficient information for them to fully understand the strengths and weaknesses of the apprenticeship provision. Further evidence states that the provider does not provide clear enough reports on the quality of education to help those responsible for governance recognise strengths and weaknesses. Governors have a superficial oversight of education processes. As a result, they are not able to provide robust challenge to the provider.

The evidence shows that the inspection team considered all quality-related reports that you presented to them during the inspection.

This aspect of your complaint is not upheld.

## **2: Your concerns about the inspection process**

You state that you have three main concerns relating to the process of the inspection, namely in respect of how the team considered your teaching methodology, prior learning and apprentices' knowledge, skills and behaviours on entry to the apprenticeship programme and the validity of inspectors obtaining evidence by telephone conversations/interviews with learners and employers when you had no opportunity to listen to the conversations.

It is clear from the detailed and comprehensive evidence that inspectors adhered to the inspection methodology as outlined in the further education and skills inspection handbook in relation to all of their inspection activities. I have listed in my responses above references to specific paragraphs of the handbook that identify why inspectors made the judgements that they did. Please also note that discussions and interviews with apprentices are not normally carried out jointly with a member of the provider's staff unless discussions take place during a joint visit to a learning session.

The evidence shows that you raised your concerns about the process of the inspection during the keeping-in-touch meeting on the morning of day 2. I can see that the lead inspector explained the process in detail to you.

This aspect of your complaint is not upheld.

### **Summary**

I regret that aspects of the inspection gave you cause for concern, and I hope that this response has served to explain matters. I would like to reassure you that your concerns have been considered thoroughly and that the appropriate action has been taken.

Please note that your inspection report will now be published on our website five working days from today. This will include any changes to the inspection report identified above and the provision will be sent an updated final report. If you have not already done so, you should share your report as set out in previous correspondence to you.



If you are concerned with any aspect of the way in which we have dealt with your complaint, please refer to Ofsted's complaints procedure, which is available on the Ofsted website at [www.gov.uk/government/publications/complaints-about-ofsted](http://www.gov.uk/government/publications/complaints-about-ofsted).

Ofsted takes complaints very seriously and endeavours to handle concerns objectively, fairly and efficiently. We would appreciate you taking time to provide feedback on how you feel we handled your concerns. We will use your feedback to improve our complaints handling process and improve the quality of our review and responses we provide. Please submit your feedback using this form: [www.smartsurvey.co.uk/s/W2BMK/](http://www.smartsurvey.co.uk/s/W2BMK/).

Yours sincerely

**Ruth Stammers**  
**Senior His Majesty's Inspector, Further Education and Skills**