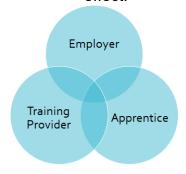
Part 15 - Quality Assuring Apprenticeships

1. Introduction

UEL has a range of apprenticeships across its 6 academic schools. Quality assurance of apprenticeship provision is very much aligned with that of other UEL courses, and the content of this chapter should therefore be read alongside other chapters in this Manual, e.g., chapter 5 *Approval and Validation of Award-Bearing Courses*.

2. Conditions that must be in place for an apprenticeship

2.1. Apprenticeships are usually a three-way agreement between an employer, a training provider and a learner (the 'apprentice'). UEL is the training provider and will be contracted by an employer to deliver training that meets a specific apprenticeship standard. The learner/apprentice works for the employer organization while also undertaking a minimum of 20% off thejob training at UEL. On occasion provision may be sub-contracted from UEL to another party, but more usually the tri-partite relationship, as below, is in effect.



2.2. The training provided by UEL, which leads to a UEL award, coupled with managed work-based learning, prepares the apprentice to undertake an end point assessment (EPA). On successful completion of the EPA an apprenticeship is awarded.



3. Conditions that must be in place to comply with external requirements

- 3.1 To provide apprenticeship training UEL must be on the right external registers:
 - UEL is already a registered provider on the Register of Training Organizations (ROTO)
 - For each new apprenticeship additional registrations need to be made e.g., registration with the Education and Skills Funding Agency (ESFA) on the Register of Apprenticeship Training Providers (RoATP).
 - Where providing End Point Assessment (EPA) or delivering an integrated degree apprenticeship, UEL must be registered on the Register of End-Point Assessment Organisations (RoEPAO) for each standard.
- 3.2 Employer Partnerships Office (EPO) need to be aware of a new apprenticeship proposal as soon as possible in order to help obtain the correct registrations. EPO will provide advice on how to comply with the ESFA Funding Rules for Training Providers, Apprenticeship Service requirements, and creating contracts between:
 - ESFA and training provider
 - Employer and training provider
 - Apprentice, training provider and employer
 - EPAO and training provider where appropriate

4 Setting Academic Standards at Validation/Review

4.1 Apprenticeship courses must fulfil both the requirements of the university academic award, and the occupation that the apprenticeship leads to, known as the Apprenticeship Standard. They must also meet all current ESFA Funding Rules. All Apprenticeship courses must comply with QAA guidance, the ESFA apprenticeship funding rules and Ofsted requirements).

Achievement of the university academic award will be obtained in the normal way, i.e. by accumulation of academic credit in line with university regulations. Achievement of the Apprenticeship will be via an End Point Assessment (EPA). The Apprenticeship Standard will define whether the EPA is integrated into the degree or must be conducted by a separate End-Point Assessment Organization. Whether the EPA is integrated or not, it will still have to be conducted by an independent third party, who has not been involved in the training or employment of the apprentice and has no other conflict of interest. Assessment plans are set out by the Institute for Apprenticeships and Technical Education (IfATE) for each Standard.

- 4.2 The Apprenticeship Standard acts as a primary reference point in the validation and review of UEL apprenticeship courses. It defines an occupation by outlining a role profile and the Knowledge, Skills and Behaviours (KSBs) that an apprentice will need to learn.
- 4.3 Input from a range of sources including staff, apprentices, employers and PSRBs form an essential part of the design, approval, monitoring and review of apprenticeships.
- 4.4 The Quality Assurance Agency UK Quality Code, advice and guidance: work-based learning, describes apprenticeships as the most integrated form of work-based learning.



- 4.5 Courses with this level of integrated work-based learning must use the context of day to day activities in the workplace as the site for the development of knowledge and understanding, and the development of skills and professional behaviours, rather than just a site for their application. This can also be referred to as work-integrated learning.
- 4.6 A course of study can be specifically designed to meet an apprenticeship standard, or an existing course can be used for this purpose. The validation process will need to verify that courses include provision for 20% off-the-job training and constitute an appropriate preparation to enable apprentices to meet the Apprenticeship Standard.
- 4.7 Where apprenticeships include PSRB recognition as an outcome of successful completion, PSRBs should be appropriately involved in the validation process.
- 4.8 Learning outcomes for apprenticeship courses should be mapped to demonstrate the relationship between the role profile and KSBs specified in

the Apprenticeship Standard. They will also need to demonstrate alignment with the Frameworks for Higher Education Qualifications (FHEQ). It may be useful to reference level descriptors such as the SEEC Credit Level Descriptors (2016), which are specifically designed to encompass learning from work settings.

- 4.9 Validation and review panels will consider whether the apprenticeship provides equal opportunities for a high-quality learning and training experience; for example, by considering the range of working contexts and the variety of employment settings within which the apprenticeship will be undertaken. This should include the relationship between the structure of courses, approaches to learning, teaching and assessment in relation to work patterns, geographical location(s) and the specific requirements of work required.
- 4.10 Validation and review panels must include at least one External Advisor who brings both practice expertise, subject expertise and relevant experience and understanding of apprenticeships. They may also include PSRB representation where an apprenticeship leads to formal recognition by a named PSRB.
- 4.11 Validation documents should clearly outline how the apprentice will be supported in the workplace to develop the duties and KSBs specified within the apprenticeship standard. It may be helpful to include:
 - 4.11.1 How many employers intend on sending apprentices to the provider, and if these employers are levy or non-levy paying.
 - 4.11.2 Proposed workplace mentoring arrangements.
 - 4.11.3 How workplace mentors will be inducted and supported in undertaking the role by both employers and providers.
 - 4.11.4 How the interaction between workplace mentor, apprentice and higher education provider tutor will be structured and the proposed schedule and arrangements for tripartite meetings between the apprentice, employer and higher education provider.
 - 4.11.5 How the working environment is appropriate to enable apprentices to develop the required duties and KSBs for the relevant Apprenticeship Standard, including matters of pastoral support, Safeguarding, Prevent duty, equality and diversity and health and safety.
 - 4.11.6 How Safeguarding, British Values and Prevent are embedded in the curriculum.
 - 4.11.7 Review panels will examine whether the support needs of apprentices are being met.

5. Aptem

5.1 From June 2021, apprenticeship compliance processes and learner progress are tracked through the learner management system,

- Aptem. All apprentices will have an Aptem record in addition to their SITs record.
- 5.2 Course leaders are responsible for ensuring data in Aptem is accurate at all times. EPO must be notified of an apprentice change in circumstance (ie withdrawal, break in learning, redundancy) as soon as possible.
- 5.3 Course teams must use Aptem throughout the duration of the apprenticeship to complete processes such as initial assessment, progress and tripartite reviews, monitoring apprentice progress and updating apprentice records. Course teams will receive training on how to use Aptem.
- 5.4 Further operational guidance can be found in the apprenticeships section of the Course Leader Handbook 2021-22.

6. Recruitment, selection and admissions

- 6.1. The UEL Employer Partnerships Office (EPO) support the recruitment, selection and admission process, by ensuring that UEL publishes accurate information about its apprenticeship offer, signposting apprentices, employers and UEL staff to the information they need to makegood decisions and helping them to engage with apprenticeship processes. This may include:
 - 6.1.1. The type and level of apprenticeship offered.
 - 6.1.2. The different locations and modes of learning that are supported and how these are organized by both the provider and employer.
 - 6.1.3. Signposts to external organizations that provide information about apprenticeship vacancies such as the 'Find an Apprenticeship Service' and the UCAS website.
 - 6.1.4. Apprenticeship vacancies (in some cases, and only in partnershipwith the employer offering the vacancy).
 - 6.1.5. How recruitment and selection of apprentices works explaining both the role of the employer and the university's admission requirements, including exit requirements for Level 2 English and Maths, and Accreditation of Prior Learning where appropriate.
- 6.2. An initial assessment of every new apprentice must be conducted to ensure the recognition of any prior learning and to ensure that learning on the apprenticeship can be classified as new learning. The KSBs set out in the apprenticeship standard will be used when undertaking the assessment.
- 6.3. Information on conducting an initial assessment:
 - 6.3.1. All apprentices must have an initial assessment before they commence their apprenticeship. Where possible the employer will

- also be involved in conducting the initial assessment.
- 6.3.2. The initial assessment will be completed via the Aptem system.
- 6.3.3. The initial assessment will establish the individual level of competence with regard to the Knowledge, Skills and Behaviours outlined in the apprenticeship standard. The apprentice will self-assess their competence against each Knowledge, Skill and Behaviour by undertaking a Skill Scan in Aptem.
- 6.3.4. The course team is responsible for reviewing the apprentice's skill scan alongside completing a professional discussion with the apprentice.
- 6.3.5. The initial assessment will be used, where appropriate, as a basis for adjusting the content and/or duration of the apprentices' training course.
- 6.3.6. This may involve identifying, for example; additional support for subject specific skills in English or Mathematics, whether the focus for the apprentice should be on developing subject knowledge vs practical skills, or identifying in which areas the apprentice may be able to achieve more stretching targets towards a higher degree classification.
- 6.3.7. The apprentice can be involved in negotiating these aspects of their course along with the employer and UEL. Learning agreements, signed by all parties, articulate what has been agreed.
- 6.3.8. Where an apprentice is shown to have prior knowledge such that they can apply for accredited prior learning, the standard policy and process for the accreditation of prior certificated or experiential learning will apply.

7. Learning, teaching and apprentice development

- 7.1. The EPO/CELT can provide advice, guidance and templates in order tomeet the learning, teaching and development requirements of degree apprenticeships.
- 7.2. In order to demonstrate the integration of on and off-the-job learning and training the Course Leader is responsible for ensuring that for each apprentice there is:An Apprentice Individual Learner Plan (ILP) within the apprenticeCommitment Statement stored in Aptem for apprentices starting after June 2021, or in Sharepoint for those starting before June 2021.
 - 7.2.2. Evidence of tripartite (employer/UEL/learner) meetings, including when they took place, what was discussed and solutions to potential challenges stored in Aptem for apprentices starting after June 2021, or in Sharepoint for those starting before June 2021.
 - 7.2.3. Evidence of hours spent on Off the Job learning via an Off the Job learning log stored in Aptem for apprentices starting after June 2021, or in Sharepoint for those starting before June 2021.
- 7.3 An apprentice's progression through their apprenticeship must be tracked, across all forms and locations of delivery and interventions and or adjustments to delivery must be managed and recorded. Aptem should be utilised to track progression for apprentices starting after June 2021.
- 7.4 All staff who teach and manage/enable learning, or are involved in assessment, including those staff who are not employees of UEL and/or are not based at UEL, must be appropriately qualified, supported and developed. They must have undertaken appropriate training and be competent to undertake their various roles and responsibilities
- 7.5 All staff who teach on apprenticeships must have appropriate Safeguarding training.
- 7.6 All staff and employers who teach on apprenticeships that can come into contact with learners under 18 must currently hold the appropriate Disclosure and Barring Service(DBS) certification.
- 7.7 Apprentices should be supported by workplace mentors. Arrangements between UEL and employers should cover the roles and responsibilities ofworkplace mentors. UEL are responsible for ensuring that workplace mentors are competent to undertake the role.
- 7.8 Where an Apprenticeship Standard is an Integrated Degree Apprenticeship, (ie. the EPA is included within the degree award, as

specified in the EPA plan) UEL will conduct the EPA as an integrated aspect of the degree, meeting the requirements of the relevant apprenticeship Assessment Plan by demonstrating the independence of the process.

- 7.9 One of the key factors required for the RoEPAO is that EPA is carried outby assessors who have relevant practice-based experience and/or expertise. Academic 'subject' expertise may not be sufficient to demonstrate that assessors are equipped to assess the professional competence of apprentices to fully undertake the requirements of the associated job role.
- 7.10 There may be a need for assessments to be sufficiently flexible to allow for the authentic reflection of learning through work-based activities and expectations.

8 External examining

- When appointing external examiners for apprenticeships, the examiner team must have an appropriate level of practice-based expertise. The required balance of subject and practice expertise might be achieved through the appointment of two external examiners, one a subject expertand the other with practice expertise.
- 8.2 EPA plans for integrated Degree Apprenticeships will necessarily include reference to external examiners, as the EPA is conducted as an integrated aspect of the qualification.

9 The apprentice experience

- 9.1 The overall experience of apprentices will be enhanced by providing clear and accessible information, including signposting to support services. Communication activity between the university, the employer, the apprentice and any sub-contractor(s) is also essential in order to ensure allparties are aware of the support available.
- 9.2 Accurate and timely information will help to inform the inter-relationship between on-the-job and off-the-job learning and training to ensure that supervision, monitoring and feedback supports the apprentice appropriately. This is particularly important where apprenticeships do not follow the standard academic year cycle; communications and information should be provided at an appropriate time in the apprenticeship. In particular, it is critical to establish clear expectations regarding the arrangements (including training) for workplace mentoring, together with the requirements for off-the-job learning and training.
- 9.3 Care must be taken when designing courses and scheduling assessment activity to ensure that there is recognition of an appropriate work/study/lifebalance. Furthermore, consideration should be given not only to academicwork cycles, but employer work cycles which may affect the ability of apprentices to study effectively.
- 9.4 UEL should have in place plans to help develop employers' use of theworkplace as a learning environment. This will include providing staff development, training mentors and, where appropriate, workplace

assessors, as well as providing information and induction for line managers and other staff working with the apprentice.

9.5 Opportunities will be provided for apprentices and employers to feedback, through engagement activity such as surveys, forums, course committees, and tripartite meetings. All apprentices are asked to complete the Induction Apprenticeship Survey six weeks into learning, which is delivered online. An online Learner Satisfaction Survey also runs at the end of term two and all apprentices are invited to complete this. In their second semester, apprentices are invited to an online School focus group which will be attended by apprentice representatives, academics, professional staff, and employers. Feedback will be considered as part of the evidence within the Continuous Monitoring Process. Actions taken to respond to that feedback will be detailed and disseminated via student and employer feedback mechanisms.

10. Managing provision with others

- 10.1 ESFA Funding Rules point out that the due diligence enquiries and the formal agreements adopted for any one arrangement should be proportionate to the volume, complexity and nature of the activity, to the type of delivery organization or support provider involved, and to the associated risks.
- 10.2 Contracts between UEL and the employer will establish clear expectations, such as:
 - 10.2.1 The role(s) of the employer in supporting apprentice learning and training.
 - 10.2.2 Arrangements for the exchange of information in relation to the apprentice.
 - 10.2.3 Access to employer resources when engaging in off-the-job learning
 - 10.2.4 Arrangements for workplace mentoring, such as induction, training, employer-provider communication, involvement in end point assessment
 - 10.2.5 The funds and additional staff available to employers to cover the workload of apprentices carrying out work experience placements.
 - 10.2.6 Protocols for addressing issues.
 - 10.2.7 Arrangements for integration of on-the-job and off-the-job training, such as identification of relevant work projects, and arrangements for involving employers in higher education course evaluation, monitoring and enhancement to be further formalised in written agreements.
- Discussions and negotiations with employers about the contents of the contract need to have concluded before the start of the apprenticeship. Atthis stage the university will also need to confirm that the employer has sufficient capacity and opportunities to support the apprentice in the workplace to meet the needs of the standard and whether any additional

- support is required.
- 10.4 A key element of apprenticeship support in the workplace is the role of the workplace mentor. The criteria for the selection of mentors should be clearly articulated in order to ensure that they are able to fully support the apprentice in the workplace and facilitate their learning. UEL is responsible for ensuring the mentors are appropriately inducted into their role by the higher education provider to undertake the role, providing training in coaching and mentoring, providing an insight into how people learn in the workplace and an overview of the course structure and assessment methodologies.
- 10.5 Should an apprentice become unemployed during the course of the apprenticeship, UEL should support the apprentice to find further employment or to transfer on to an alternative course of study.

11. Monitoring and review

- 11.1 Standard monitoring and review processes will be in place for apprenticeship courses. Additional arrangements will be in place to evidence that the standard requirements for conducting apprenticeships are being met, and for the employer, workplace mentors, and any subcontractors to provide their input. The Continuous Monitoring Process (CMP) Report that is completed annually for each course at UEL has been adapted for apprenticeships to ensure all appropriate evidence is recorded and reviewed. For each apprenticeship the Continuous Monitoring Process Report form should be completed.
- 11.2. Tripartite meetings are meetings between UEL, employer and apprentice. These meetings ensure that feedback can be given and received from all parties. All apprenticeships are required to have regular tripartite meetings.UEL will record the evidence of these. Tripartite meetings will ensure the apprenticeship meets the needs of the individual apprentice, employer and university, and are held at regular intervals. Best practice for their operationinvolves:
 - 11.2.1. Meetings take place at the apprentice's place of work or remotely on a 12-weekly basis. The frequency of these meetings is set within the employer agreement and may be specified by the apprenticeship standard.
 - 11.2.2. Meetings are undertaken by the course lead and visits to the employer should coincide with the tripartite meetings.
 - 11.2.3. All tripartite meetings should be recorded (and shared with both employer and apprentice). The School must keep records of the meetings somewhere that can be accessed swiftly in the event of an audit. For apprentices starting after June 2021, tripartite meetings should be conducted in Aptem.
 - 11.2.4. All tripartite meetings should review English and Maths development in the context of everyday work.

- 11.2.5. All tripartite meetings should address any Safeguarding issues apprentices may be experiencing.
- 11.2.6. Progress Reviews must be completed with the learner to assess progress against the apprenticeship standard. These reviews must take place monthly.

11.3 There may also be a requirement for external monitoring and review, course teams should ensure that all those involved in the apprentices'learning and training experiences are included in those processes.

12 Specific information relating to Ofsted

12.1 All apprenticeships fall within the quality assurance remit of Ofsted. Ofsted will inspect provision based on the Education Inspection Framework (EIF). This framework is described in the Further education and skills inspection handbook. Found at:

https://www.gov.uk/government/publications/further-education-and-skills-inspection-handbook-eif

- 12.2 All UEL apprenticeships will need to be prepared for inspection at 48 hours' notice.
- 12.3 The Dean of EDUCOM is the lead contact for UEL with regards to Ofsted.
- As of July 2019 the university established an Ofsted readiness working group under the supervision of the Education and Experience Committee, which became the Apprenticeships Compliance Sub-Committee in 2021. Itis the remit of that group to ensure the university is making sufficient progress towards ensuring the requirements of the EIF are embedded in UEL policies and processes.
- 12.5 Schools with current provision in scope for inspection are members of the working group. Schools that are considering new provision that would be inscope for inspection will be identified during the initial approval process, thevalidation process will then take into account the requirements of the EIF.

13 Approval of Delivery of Educational Training for Higher and Degree Apprenticeship Standards linked to an UEL Award.

- 13.1 Approval Stages
 - 13.1.1 Initial Approval must be obtained via the standard process describedin part 5 of the Quality Manual.
 - 13.1.2 Validation via the school quality committee or Quality Assurance and Enhancement organized approval event.
 - 13.1.3 If the approval involves the validation of a new course or revalidation of an existing course see section A.
 - 13.1.4 Or
 - 13.1.5 If the approval is linked to a currently validated UEL course (without modifications that would prompt a revalidation) see section B.

13.1.6 Final Approval noted by Education and Experience Committee onbehalf of Academic Board.

14 Section A – If the approval involves the validation of a new course or revalidation of an existing course.

- 14.1 Two external advisors must be appointed as detailed in the Quality Manual Part 5 section 4. At least one of these advisors must have substantive practical expertise.
- 14.2 A member of the Employer Partnerships Office and a Senior Member of Registry Staff (Assistant Registrar) should be invited to attend the approval event.
- 14.3 The documentation requirements are the same as in the Quality Manual Part 5 section 5.
- 14.4 The following additional documentation will be required:
 - 14.4.1 A mapping of modules against the Knowledge, Skills and Behaviours within the Higher / Degree apprenticeship standard.
 - 14.4.2 A schedule for completion of the course, 80% to 20% on and off-thejob training, EPA Plan and the associated apprenticeship standard, for a typical apprentice.
 - 14.4.3 Arrangements for all staff who teach and manage/enable learning, including those staff who are not employees of UEL and/or are not based at the UEL, to be appropriately qualified, supported and developed.
 - 14.4.4 Specific detail on the course specification aimed at helping apprentices understand the structure of their course and/or any additional requirements/non-applicable sections as compared to standard students.
 - 14.4.5 Confirmation of how any gateway requirements for the Apprenticeship will be met (e.g., mandatory qualifications, evidence of attendance, practice portfolios, formal reviews).
 - 14.4.6 Confirmation from the Employer Partnerships Office (EPO) that registrations have been completed (e.g., RoTAP, RoEPAO) where relevant.
 - 14.4.7 Details of how it is anticipated the End Point Assessment will be achieved.
 - 14.4.8 Details of how Safeguarding, British Values and Prevent are embedded in the curriculum.

- 14.5 In addition to the information provided to School Quality Committee in the Quality Manual Part 5 section 5.2, the following documentation will be provided to assist with deliberations:
 - 14.5.1 The associated Higher Apprenticeship Standard and Assessment Plan
 - 14.5.2 This chapter of the Quality Manual
 - 14.5.3 The QAA Characteristics Statement for Higher Education in Apprenticeships
- 14.6 The approval process will be as outlined in the Quality Manual Part 5 section 6. The approval event will consider additionally:
 - 14.6.1 The system of delivery of the course and apprenticeship.
 - 14.6.2 Support infrastructure, roles and responsibilities of academic and support staff.
 - 14.6.3 Apprentice access to UEL systems, support and guidance services.

14.7 Peer Review

- 14.7.1 The approval process will be as outlined in section 7 above. Peer reviewers will additionally receive a copy of the mapping document.
- 14.8 Appointing an External Examiner
 - 14.8.1 Within the team of External Examiners appointed to review Higher and Degree Apprenticeship Modules there must be substantive practice expertise.

15 Section B – If the approval is linked to a currently validated UEL course (without modifications that would prompt a revalidation)

- 15.1 A minimum of one External Advisor with substantive practice expertise must be appointed. Modifications to the course can also be sought underthe 25% rule (see Part 6 of the Quality Manual)
- 15.2 A member of the Employer Partnerships Office and a Senior Member of Registry Staff (Assistant Registrar) should be invited to attend the approval event.
- 15.3 The following documentation will be required:
- 15.4 An approval document to include:
 - 15.4.1 The context and rationale for the Higher / Degree Apprenticeship
 - 15.4.2 A mapping of the modules of the course against the Knowledge, Skills and Behaviours within the Higher / Degree Apprenticeship Standard.
 - 15.4.3 All module specifications including any amendments.

- 15.4.4 A schedule for completion of the course and the associated apprenticeship standard for a typical apprentice.
- 15.4.5 Arrangements for all staff who teach and manage/enable learning, including those staff who are not employees of UEL and/or are not based at the UEL, to be appropriately qualified, supported and developed.

15.4.6 Resources:

- 15.4.6.1 A statement making it clear what physical resources are available to support the course (e.g. library, computer hardware and software, specialist accommodation, other specialist equipment), and how apprentices will access the resources.
- 15.4.6.2 A statement making it clear what resources are available to support the apprentice's Health and Wellbeing, and Pastoral care
- 15.4.7 Confirmation of how any gateway requirements for the Apprenticeship will be met (e.g., mandatory qualifications, practice portfolios, formal reviews).
- 15.4.8 Details of how it is anticipated the end point assessment will be achieved.
- 15.4.9 Confirmation from the Employer Partnership Office that registrations have been completed (e.g., RoTAP, RoEPAO) where relevant.
- 15.4.10 An amended course specification. There should be a different course specification for any apprenticeship or non-apprenticeship version of a course.
- 15.4.11 If there are modifications to curriculum content Via the external adviser's report, confirmation that; assessment design, materials, and support, have been considered against quality assurance requirements, the Apprenticeship Standard, and the associated Assessment Plan.
- 15.4.12 Details of how Safeguarding, British Values and Prevent are embedded in the curriculum.
- 15.5 In addition to the information provided by the course proposer, the following documentation will be provided to assist school quality committee with theirdeliberations:
 - 15.5.1 The associated Apprenticeship Standard and Assessment Plan
 - 15.5.2 This chapter of the Quality Manual
 - 15.5.3 The QAA Characteristics Statement for Higher Education in Apprenticeships
 - 15.5.4 If there are modifications to curriculum content The external advisor's written comments.

- 15.5.5 The approval process will be as outlined in the Quality Manual Part 5 section 6.
- 15.6 The approval event will consider additionally:
 - 15.6.1 The system of delivery of the course and apprenticeship
 - 15.6.2 Support infrastructure, roles and responsibilities of academic and support staff
 - 15.6.3 Apprentice access to UEL systems, support and guidance services
 - 15.6.4 Employer's review of the apprenticeship course
- 15.7 Peer Review
 - 15.7.1 The approval process will be as outlined in section 7 above. Peer Reviewers will additionally receive a copy of the mapping document
- 15.8 Appointing an External Examiner
 - 15.8.1 Within the team of External Examiners appointed to review Apprenticeship Modules there must be substantive practice expertise.