**UVAC Response to the Recommendations in Runaway Training - EDSK**

EDSK’s report Runaway Training with a headline claiming that ‘fake Apprenticeships’ have accounted for 50% of starts since the introduction of the Apprenticeship levy, summarises its focus and purpose. The report seems to have more to do with EDSK wanting to secure press headlines, rather than to stimulate serious debate. Incendiary language and dubious claims are not, however, the main problem with the report.

The key problem is that the authors assume that the primary, indeed only, purpose of Apprenticeship is to ‘improve technical education for young people’. They then go on to decide that Apprenticeship should be exclusively focused on level 3 (A level equivalent) programmes. EDSK for some reason choose to ignore the fact that the policy rationale for the introduction of the Apprenticeship levy was the failure by employers to invest sufficiently in the training and development of their staff which was a key factor in explaining the UK’s low productivity.

The use of Apprenticeship as a tool to tackle skills gaps and shortages in occupations and at levels needed by employers is, for the most part, ignored. So to is the role of Higher Apprenticeship and Degree Apprenticeship in creating new progression routes to the professions. To EDSK the fact that police forces are using Degree Apprenticeship to ‘*drive innovation and transform professional practice’* and as *‘a key part in the forces’ strategy to attract officers from diverse groups and crucially to ensure that they have the skills required to meet the highly complex requirements of 21st Century policing’* [[1]](#footnote-1) doesn’t seem to register. EDSK’s recommendations mean that if the NHS wants to use its levy payments to train registered nurses and nurse associates, such Apprenticeships shouldn’t be called Apprenticeships and the NHS should be required to make a substantial additional contribution to the cost of such training programmes. Why? Because the EDSK believes, Apprenticeship should only be a level 3 programme regardless.

Given EDSK’s flawed understanding of the rationale for the Apprenticeship levy and Apprenticeship reforms and belief that Apprenticeship should be a level 3 programme primarily for young people, the recommendations in the report, as below, make little sense.

**EDSK Recommendation** - *The Department for Education should introduce a new definition of an ‘apprenticeship’ that is benchmarked against the best technical education systems in the world, meaning that the term ‘apprenticeship’ will only be used for courses at the international standard of Level 3 (equivalent to A-levels).*

A backward step that should be rejected. The rationale for the introduction of the Apprenticeship reforms and Apprenticeship levy was that employers were not investing sufficiently in the training and development of their employees. This failure to invest was a key factor explaining the UK’s low productivity. The Apprenticeship Trailblazer process allows employers to develop the Apprenticeships (at whatever level) their businesses need. Employers not organisations like the EDSK are best placed to decide on the Apprenticeships they need and in accordance with IfATE rules what constitutes an Apprenticeship. If Apprenticeship is to have a role in addressing skills gaps and shortages then employers will want to (and will need to) use Apprenticeships at levels 2 to 7. Key areas of provision will be at levels 4 – 7 where skills gaps and shortages are most apparent.

EDSK’s arguments that Apprenticeship should only be used for level 3 are weak. Apprenticeship must be first and foremost a productivity programme rather than just a form of level 3 training provision for young people. All the evidence suggests that Degree Apprenticeship strengthens the Apprenticeship brand. An Apprenticeship, as a work-based programme that develops the knowledge, skills and behaviours required to be occupationally competent, is entirely relevant for occupations at levels 2 to 7. This may not be EDSK’s position, but employers (the customer of the Apprenticeship system) and Professional Statutory and Regulatory Bodies (PSRBs) have embraced Apprenticeship at level 4 to 7. Employers are and will increasingly use such apprenticeships to tackle skills gaps and shortages and raise productivity. Such Apprenticeships will deliver the primary objective of the programme to raise productivity.

EDSK is behind with its thinking. Our international competitors are becoming increasingly interested in England’s Apprenticeship reforms and Degree Apprenticeship in particular. So as EDSK seeks to adopt historic international practice our international competitors seem keen to explore how they can replicate new approaches to Apprenticeship pioneered in England.

**EDSK Recommendation** - *All low-skill and generic training courses that do not meet this new definition should be scrapped immediately.*

UVAC has argued that the movement upwards in Apprenticeship has been a good thing. We have also questioned the widespread use of some of the more generic apprenticeships – customer service being a good example. There are, however, some level 2 Apprenticeships that are needed – many trade and craft Apprenticeships being good examples – baker, butcher, carpenter/joiner etc. EDSK’s recommendation to only focus on level 3 would potentially mean such Apprenticeships were not available. A review of level 2 Apprenticeships is needed, but to scrap level 2 Apprenticeships immediately (if this is really what is proposed) would have a highly detrimental impact on some occupations, employers and many individuals who could benefit from such programmes.

**EDSK Recommendation** - *The apprenticeship levy should be renamed the ‘Technical and Professional Education Levy’ and all existing ‘apprenticeships’ from Level 4 to Level 7 should be renamed ‘Technical and Professional Education’ (TPE) as well as having their funding reduced.*

To rename Higher and Degree Apprenticeships as Technical and Professional Education (TPE) would be a highly retrograde step. Degree Apprenticeship is changing the perception of Apprenticeship. They are helping Apprenticeships become an aspirational programme and not the choice for ‘other people’s children. A Degree Apprenticeship is the best of both worlds – a degree and an apprenticeship and employment. This is the biggest success story we have had in a generation in ending the academic and vocational divide. Many professional level roles require a degree and in many cases the degree accredits the occupational competence required for entry to a profession. At levels 6 and 7 employers want the ability to use a degree or alternatively a professional qualification in an Apprenticeship. Degree Apprenticeships are helping employers attract new and under-represented cohorts to enter professional occupations.

The recommendation to reduce funding for levels 4 to 7 is outrageous and shows little understanding of which employers pay the levy. This is a highly relevant point given the disproportionate contribution in levy payments made by public sector employers. On this issue, EDSK’s claim that preventing employers from spending on all Bachelors and Masters programmes will save £550m is not just misleading but is just plain wrong and should be dismissed. Is EDSK really arguing that NHS trusts, police forces and local authorities should be restricted on the amount of their levy funds they can spend on Apprenticeships for nurses, police constables and social workers because this saves the Government money?

EDSK makes an entirely unconvincing case as to why level 3 Apprenticeships should in financial terms be prioritised. If Apprenticeship is about productivity then employers must be allowed to focus on the Apprenticeships that make the most contribution to raising skills levels and productivity. Prioritising funding raised from a skills levy on employers for level 3 provision makes absolutely no economic sense. Skills gaps and shortages are most critical in level 4 – 7 occupations – so why the focus on level 3/

**EDSK Recommendation** - *Bachelor’s degrees and Master’s level courses that have been labelled as ‘apprenticeships’ should be excluded from the scope of the new TPE levy.*

This recommendation makes no sense and should be rejected. Degree Apprenticeships are not degree programmes labelled as Apprenticeships. Degree Apprenticeships are developed by employers as with other Apprenticeships as work-based programmes that enable individuals to gain the knowledge, skills and behaviours needed to become occupationally competent as defined in the Apprenticeship standard. EDSK entirely fails to understand that in many cases degrees are required by PSBRs to develop and accredit occupational competence. Are EDSK really saying that a degree should not be used to develop and accredit the skills of a registered nurse? Employers should be allowed to specify and use degrees and professional qualifications in Apprenticeships that their sectors and organisations need.

**EDSK Recommendation** - *Ofsted should be made the sole regulator for any apprenticeships and technical and professional education funded by the new TPE levy, including provision in universities.*

The authors of the report show little understanding of higher education quality assurance. Higher Education and our regulators have worked for decades with PSRBs to develop programmes that accredit occupational competence, nursing, health and social work being good examples. Indeed, QAA works with around 90 PSRBs, such as the Nursing and Midwifery Council, RICS, IMechE, ICE etc. Higher Education regulation has ensured that we have competent doctors, nurses and social workers. Similarly, Higher education programmes play a big role in ensuring employers have the competent engineers and managers they need. In contrast Ofsted inspection has a focus on the quality of lower level training programmes, for example, hairdressers, chefs, business administration and customer service staff. Government should make a decision on the basis of the views of PSBRs, the expertise and experience of OfS/QAA and Ofsted and should use the best organisation/process for the job. At levels 6 and 7 and arguably 4 and 5, this means OfS/QAA quality regulation and not Ofsted inspection is the appropriate approach.

**UVAC – January 2020**

1. Quoted from Police Forces using Degree Apprenticeship [↑](#footnote-ref-1)