



UVAC response to the recommendations in *No train, no gain: an investigation into the quality of apprenticeships in England* - EDSK

EDSK's latest report [No train, no gain](#), with a headline claiming that the England apprenticeship system is still littered with jobs 'masquerading as apprenticeships' reminds me of its earlier 2020 report, [Runaway Training](#), and its headline grabbing claim that 'fake apprenticeships' accounted for half of all starts following the introduction of the apprenticeship levy. Then EDSK used incendiary language to target higher and degree apprenticeships and claimed they were not really in the spirit of apprenticeships at all. A further recommendation posited how the Department for Education (DfE) should introduce a new definition of an 'apprenticeship'; one that should be exclusively focused on programmes at the international standard of level 3, a backward step that UVAC suggested then, should be rejected. You can see UVAC's full response [HERE](#).

Thankfully 3 years ago the EDSK report failed to gain its intended traction and this latest issue from the EDSK think-tank researchers is unlikely to either. Not just because it presents a curious throwback to the Richard Review but because it ignores the rationale for the introduction of apprenticeship reforms and the apprenticeship levy which uniquely gave England an all age, all stage, all level programme. This time, the focus is on low skill roles being 'rebadged as apprenticeships' although several higher-level apprenticeships are singled out for criticism for inventing, not fake apprenticeships this time, but 'fake job titles to access apprenticeship funding'.

The authors suggest that the apprenticeship brand is being misused by upskilling existing staff. For UVAC this is one of a number of red herrings that we have consistently argued against. Apprenticeships for existing members of the workforce are important too. Progression routes are being strengthened in many professions using apprenticeships, the nursing associate and registered nurse apprenticeship being a good example, including new professions(!) and emerging job roles where skills are being professionalised and standards of occupational competence recognised.



As in 2020, EDSK again need reminding about what the expectations of apprenticeships are. Because apprenticeships as envisaged through the apprenticeship reforms became a very different programme to the programmes funded previously. Apprenticeships are focused on productivity and social mobility and the apprenticeship levy introduced to replace state investment and fund all apprenticeship provision was not sold to employers as a tax to fund lower-level work-based learning programmes to equip young people with the skills many would argue should have been gained at school. The integrity of the apprenticeship brand is not being damaged as the report claims. Apprenticeships have moved from being an intermediary and provider led programme with little focus on skills gaps and shortages to a high-quality employer led programme where apprenticeships are focused on the real skills needs of employers and the UK economy.

While there are headline issues of performance across the breadth depth of apprenticeship provision, we must not forget that the apprenticeship system in England at the end of 2022 is improving access to more highly paid careers, creating routes in and through work to higher technical, managerial and professional job roles and improving access to the professions for those with social and economic disadvantage. This demonstrates real social mobility impact. Middlesex University's [Move On Up? report](#) identifies the effect of progression in apprenticeships on first-generation university adult students already in work. Such success should be celebrated.

The focus on the value of the off-the-job learning is an interesting one. The real issue here is given that all apprentices are employed for the purposes of undertaking 'a job with training', which is the definition of an apprenticeship, the separation between 'work' and 'training/learning' is unhelpful. The concept of 'off the job' learning and the requirement in apprenticeship for a 20% 'off the job' training component, are anachronistic, outmoded and fail to reflect and indeed undermine best practice in work-based and blended learning. Occupational competence is achieved by the acquisition and combination of knowledge, practice and behaviours. A successful blended learning programme of theory and practice represents more than the sum of its parts. Training providers deliver support for 'on' and 'off the job' learning. The 20% 'off the job' requirement should be seen as an apprentice's entitlement for time within their employed hours to focus on learning and NOT the amount of teaching that a provider delivers. EDSK report, unfortunately, rather than focusing on good practice, falls into the same trap as the ESFA Funding Rules for



Apprenticeship with its focus on separating the 20% ‘off the job’ learning, rather than fully recognising the workplace as the primary site of learning. A 1960s-day release model of learning involving one day a week ‘off the job’, should not be the basis for measuring quality in apprenticeships delivered in 2022.

In response to several of the recommendations in the report around creating a better experience for apprentices, as below, we would state:

EDSK Recommendation 1 - *The Government should publicly restate its commitment to the Richard Review’s definition of what constitutes a high-quality apprenticeship that benefits learners as well as employers. Any ‘apprenticeship’ that does not meet this definition should be immediately banned from accepting new apprenticeship starts and fully withdrawn by 2024.*

This is a backward-looking step that should be rejected. The Richard Review is now 10 years old. It predates the rationale for the introduction of degree apprenticeships and the apprenticeship levy (primarily because employers were not investing sufficiently in the training and development of their employees) and the start of the Institute for Apprenticeships and Technical Education (IfATE). 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/ESFA rules, what constitutes a quality apprenticeship programme. Apprenticeships, as defined by statute and as a work-based programme that develops the knowledge, skills and behaviours required to be occupationally competent, are 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 all levels. Measures of quality are, by their nature, complex. Having a focus on ensuring apprenticeship delivers on its primary policy objectives – increase productivity and support social mobility – is as important.

We would agree that Government should move away from supporting poor quality, low paid and insecure jobs and focus on up-skilling the workforce and providing opportunities for all to secure higher productivity jobs. We would anticipate a focus on the industrial strategy and public sector priorities, on levels 3 – 8 occupations and



the green economy, advanced manufacturing, digital, pharmaceuticals, the creative sector etc. and of course key public sector roles.

EDSK Recommendation 2 - *To create a common and transparent understanding of the training programme that apprentices will receive, employers should be required to produce a 'training curriculum' for each apprenticeship standard from 2024 onwards. The curriculum (designed in collaboration with Awarding Organisations and training providers) will set out a complete list of the content, tasks and activities that will be delivered to learners over the course of their apprenticeship.*

The current system already provides opportunities to develop new forms of provision based on employer and individual need, co-created and co-delivered in new ways. It offers flexibility, enabling individuals of all ages to up-skill and re-skill in a manner that is convenient or suitable for them, whilst working or undertaking other responsibilities. Of more use would be a commitment that apprenticeships should not support dead end roles or train individuals for questionable jobs. Indeed, individuals of all ages need to be informed consumers and be supported to progress to the next level in their careers. Apprenticeships could make a far bigger impact on social mobility if opportunities for progression were better articulated. How, for example, does a level 3 health programme such as a T level lead to a level 5 nursing associate programme with an employer and how can a nursing associate progress to become a registered nurse?

EDSK Recommendation 3 - *To ensure that all apprenticeships are for skilled occupations and roles that require at least 12 months of training (as specified in the existing funding rules), every new training curriculum must include a minimum of 300 hours of off-the-job training in every year of the apprenticeship.*

Where a mandatory qualification is specified within a non-integrated apprenticeship standard, the learning hours indicated by the qualification do not necessarily correlate with either the minimum statutory off-the-job training/learning hours or the total number of learning hours required to develop the Knowledge, Skills and Behaviours required by the apprenticeship standard. The report misses an all-important point. The key to determining the total number of apprenticeship learning hours required is to establish the number of on-the-job training/learning hours. It is important to consider time spent on all learning activities that contribute to the development of the KSBs specified in an apprenticeship standard.



EDSK Recommendation 4 - *To prevent any employer or provider from ignoring their responsibilities to offer genuine training to every apprentice, a minimum of 200 hours out of the new 300-hour annual training curriculum must be delivered face-to-face. Any time spent by an apprentice completing homework or other assignments will also no longer be counted as 'training'.*

This recommendation makes no practical sense. Harnessing new pedagogies, recognition of prior learning (RPL) and new digital learning technologies is the name of the game. Too much emphasis prior to Covid was placed on traditional college and university delivery and too little on distance, blended and work-based learning. Through RPL providers should be encouraged and supported to tailor programmes to individual and employer need. The increased use of new virtual platforms could accelerate approaches to deliver in a new way and develop a world-class approach to work-based and blended learning. Recent adaptations and innovations geared to overcoming challenges presented by the pandemic have other potential advantages, including improving efficiency and effectiveness, widening access, enabling interaction between physically distant participants, improving accessibility in remote areas and across geographically dispersed occupations, and widening catchments. Mixing asynchronous and synchronous elements is also good practice and recent events have provided an impetus to move away from traditional pedagogies, aiding the development of more active learning methods and connecting learners through online learning communities

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