

# Ensuring quality in apprenticeships

A survey of subcontracted provision

---

This report evaluates the quality of apprenticeships with a particular focus on subcontracting arrangements. The findings draw on evidence from visits to 17 providers, an online survey of 500 apprentices, and an analysis of national data and inspection reports published since September 2011.

**Age group:** Post-16

---

**Published:** October 2012

---

**Reference no:** 120153



The Office for Standards in Education, Children's Services and Skills (Ofsted) regulates and inspects to achieve excellence in the care of children and young people, and in education and skills for learners of all ages. It regulates and inspects childcare and children's social care, and inspects the Children and Family Court Advisory Support Service (Cafcass), schools, colleges, initial teacher training, work-based learning and skills training, adult and community learning, and education and training in prisons and other secure establishments. It assesses council children's services, and inspects services for looked after children, safeguarding and child protection.

If you would like a copy of this document in a different format, such as large print or Braille, please telephone 0300 123 1231, or email [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk).

You may reuse this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit [www.nationalarchives.gov.uk/doc/open-government-licence/](http://www.nationalarchives.gov.uk/doc/open-government-licence/), write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk).

This publication is available at [www.ofsted.gov.uk/resources/120153](http://www.ofsted.gov.uk/resources/120153).

To receive regular email alerts about new publications, including survey reports and school inspection reports, please visit our website and go to 'Subscribe'.

Piccadilly Gate  
Store Street  
Manchester  
M1 2WD

T: 0300 123 1231  
Textphone: 0161 618 8524  
E: [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)  
W: [www.ofsted.gov.uk](http://www.ofsted.gov.uk)

No. 120153

© Crown copyright 2012



# Contents

---

<b>Executive summary</b>	<b>4</b>
<b>Key findings</b>	<b>6</b>
<b>Recommendations</b>	<b>7</b>
<b>The contractor–subcontractor model of delivering apprenticeships</b>	<b>8</b>
<b>The nature and quality of apprenticeship programmes</b>	<b>10</b>
The employment status of apprentices	10
The duration of apprenticeship programmes	10
Delivering the components of the apprenticeship programme	11
Building on existing skills	14
Quality assuring assessment	14
Good practice	15
Poor practice	16
<b>The management of subcontracted partners</b>	<b>17</b>
The selection of subcontracted partners	17
The impact of management fees on the subcontractor	18
Managing and quality assuring the work of subcontracted partners	18
Subcontractors’ views of their relationship with the lead contractor	23
Underperformance by lead contract holders in apprenticeship provision	25
<b>The views of apprentices</b>	<b>25</b>
<b>The views of employers</b>	<b>26</b>
Supporting employers’ apprentices	26
<b>Notes</b>	<b>27</b>
<b>Annex A: Further information on apprenticeships</b>	<b>29</b>

## Executive summary

Apprenticeships have taken on a key role in the government's strategy to develop the skills of the workforce and to promote the growth of the nation's economy. In 2010–11, 457,200 young people and adults started an intermediate, advanced or higher apprenticeship.<sup>1</sup>

This survey investigated the quality of apprenticeship programmes, with a particular focus on subcontracting arrangements. Since the introduction of minimum contract levels in 2011, many providers of apprenticeship training have had to join consortia or find a lead contractor to secure funding for their training.

Ofsted conducted survey visits in May 2012 to 17 subcontractor providers. During these visits, 110 apprentices and 40 employers were interviewed and at least one lead contractor was interviewed on each occasion. Evidence was also gathered from seven inspections of further education and skills providers that were taking place at the time of the survey and an analysis of inspection reports published since September 2011. In addition, an online survey of just over 500 apprentices was carried out to give an overview of learners' views on their experience of apprenticeships.

The most effective subcontracting arrangements seen in the survey were between subcontractors and other like-minded independent learning providers working as part of a consortium or training group. In these circumstances, the arrangements had improved their offer and added value to the experience of their apprentices. A true delivery partnership existed, with savings on shared services and a common vision of offering high-quality apprenticeship training.

Inspectors found that although some lead contractors legitimately regarded subcontracting as a way of meeting the needs of employers or expanding their training offer where they did not have the expertise themselves, others clearly saw it as a way of generating income for doing little work. Managers from three of the lead contractors interviewed could not give coherent reasons for selecting partners as subcontractors.

Subcontractors who were not part of a training group or consortium were unhappy at what they perceived as poor value for money for the management fees charged by lead contractors. Of the 45 lead contractor fees charged to subcontractors in the survey, just around half were above the maximum of 15% of the contract value that was the expectation of the Skills Funding Agency for the 2011–12 contract year. All but three of the subcontractors visited held more than one contract with different lead contractors. There was little relationship between the management fees that lead contractors charged and the quality of the service and support they provided.

---

<sup>1</sup> *Quarterly statistical first release, post-16 education: June 2012*, Data Service, June 2012; [www.thedataservice.org.uk/statistics/statisticalfirstrelease](http://www.thedataservice.org.uk/statistics/statisticalfirstrelease).

Subcontractors rightly felt that the higher fees were not justified. These fees were often described by the main contractor as a premium for 'risk' for new subcontractors, even if subcontractors had a track record of high-quality performance.

In several cases in the survey, the lead contractors had a history of barely satisfactory performance in delivering apprenticeships themselves. The size of their existing contracts, rather than the performance of lead contractors in delivering apprenticeships, appeared to be the main factor in allowing them to expand their provision through taking on more subcontractors.

All the lead contractors interviewed had some form of due diligence in their choice of subcontracted partners. However, too much of the lead contractors' monitoring of their subcontracted provision was insufficiently rigorous. Lead contractors placed too great an emphasis on auditing paperwork at the expense of quality assuring and improving provision. For every good example of observation of different parts of the apprenticeship training process, there was another example of a lead contractor where little or none took place, or where those carrying out the assessment were not suitably experienced to make relevant judgements. One subcontractor, based over 100 miles from its lead contractor, had carried out only one observation of training in 15 months.

Too many apprentices did not have real and sustained employment during and after their apprenticeship. This applied to a quarter of the apprentices in the subcontracted providers visited and just over a third of those who responded to the online survey. There were examples of apprentices, particularly younger ones, being used as inexpensive labour during their training and then being discarded as employees to be replaced by new apprentices.

Apprenticeship frameworks in different vocational areas at the same level varied widely in the demands on learners, including the time required to complete them. Too much of the apprenticeship training encountered was too short to embed properly the employment and technical skills being developed by apprentices. The areas where apprenticeships were delivered quickly commonly included information technology (IT), retail, leisure, customer service and business administration. Areas such as construction, engineering and hairdressing were delivered over longer periods and were more likely to include traditional and better quality training, often delivered off-the-job. The subcontractors visited were generally working towards extending the duration of all apprenticeships to at least a year by August 2012.

The 110 learners interviewed during the survey visits were mostly positive about their experience as apprentices. The highest levels of satisfaction were associated with the programmes that involved greater amounts of traditional off-the-job teaching. Around half of the apprentices in the subcontracted provision visited did not receive regular training away from the workplace. Logs of 'guided learning hours' were being kept to show how the apprenticeships were being delivered wholly in the

workplace. Inspectors felt that such programmes were focused too much on the assessment of apprentices rather than on the delivery and quality of their learning. Many of these apprentices were being trained in isolation and missed out on the benefits of mixing with other apprentices from different employers to give them a broader experience and share experiences of work.

Most of the employers interviewed were actively involved in some aspects of the training and assessment of their apprentices and three quarters had some previous knowledge of the training provider. However, neither the employers nor the apprentices interviewed had a clear understanding of the role of lead contractors and their responsibility for ensuring the quality of the learning programme.

## Key findings

- The introduction of the minimum contract levels for 2011–12 has meant that several hundred smaller providers have needed to subcontract their funding, or lose the ability to continue providing apprenticeships. In reality, for the subcontractors visited in the survey, this has imposed a cut on their funding of between 10% and 35%.
- Of the 45 lead contractor fees charged to subcontractors in the survey, just under half (22) were above the expectation of the Skills Funding Agency that a maximum fee of 15% be levied for the 2011–12 contract year. There were several examples of lead contractors who charged the most being responsible for poor monitoring and support.
- The most effective partnerships were between subcontractors and other like-minded independent learning providers. The arrangements had improved their offer and added value to the experience of apprentices.
- All the lead contractors interviewed had some form of due diligence in their choice of subcontracted partners. However, too many of the lead contractors did not adequately quality assure the work of their subcontractors or add value to the experience of their apprentices. There was too much emphasis on auditing paperwork rather than quality assuring and improving provision.
- Data show that too many lead contractors do not have a history of high success rates in their own apprenticeship provision. Several of the lead contractors interviewed did not have sufficient expertise internally in work-based learning to lead others on monitoring and improving subcontracted provision.
- Too many apprentices interviewed in the survey did not have real and sustained employment. This applied to a quarter of the apprentices interviewed in the subcontracted providers visited. Just over a third of the 500 apprentices responding to an online survey did not consider themselves to be holding a permanent job during their apprenticeships.
- Some of the apprenticeship training encountered was too short to embed the skills being developed by apprentices. This was encountered most frequently in provision in IT, retail, leisure, customer service and business administration.

- Where provider staff, learners or employers are dissatisfied with an aspect of training there is currently no obvious point of contact to report concerns to. One lead contractor described approaches from dubious parties wanting to act as subcontractors, but said there was no obvious body to refer their concerns to.
- The 110 learners interviewed during survey visits were mostly positive about their experience as apprentices. The highest satisfaction levels were associated with the programmes that involved greater amounts of traditional off-the-job teaching. Apprenticeships that were delivered wholly in the workplace generally focused too much on the assessment of apprentices, rather than their learning. Too much emphasis was being placed on apprentices completing their learning through using workbooks and online resources.
- Several examples were seen of good resources being held by lead contractors that were not shared to benefit their subcontractors' apprentices.
- Around four fifths of the employers interviewed were actively involved in some aspects of training and assessing their apprentices. Around half felt they had been asked their views on training at some stage by the subcontractor. However, 38 of the 40 employers interviewed had little understanding of the role of lead contractors in the arrangements for training their apprentices.

## Recommendations

The Department for Business, Innovation and Skills (BIS) and the Department for Education should, through the Skills Funding Agency and the National Apprenticeship Service (NAS):

- issue guidance on who should be allowed to act as a lead contractor, linked to previous levels of performance rather than the value of the contract held
- monitor and challenge the value for money where high fees are charged for subcontracting arrangements without clear explanation
- consider the benefits for learners of allowing smaller outstanding providers with a long history of high success rates to continue to hold their own contracts, even if below the minimum contract level
- improve the availability of timely data about lead contractors, their subcontractors and what is being funded so that planning of inspections and monitoring by other agencies is made easier and more efficient
- collect and report data on the number of apprentices who, on completing their apprenticeship, secure permanent employment with their current employer or who progress to permanent employment with another employer in the same occupational area
- consider introducing an independent whistleblowing hotline for employees, learners and employers where they can report their concerns.

Sector skills councils and awarding bodies should:

- ensure that providers who offer National Vocational Qualifications (NVQs) for the first time in a new occupational area have access to adequate staff and appropriate resources
- ensure that Specification of Apprenticeship Standards in England (SASE) requirements are consistently being met by providers delivering apprenticeships.

Lead contractors for apprenticeship training should:

- ensure that all learners are clear about their employment status during training and monitor carefully the number of learners who fail to secure sustained employment
- be more transparent about the reasons for the management fees they take from apprenticeship funding. The level of the fee should reflect each lead contractor's role in the delivery and quality monitoring of the training
- take full responsibility for the quality of provision for all learners, including those receiving training from subcontracted providers, through:
  - setting service standards and clear performance indicators for their subcontractors
  - developing sufficient internal expertise and resources to monitor their subcontractors
  - sharing training opportunities, staff expertise and resources to improve subcontracted provision
  - keeping records of quality monitoring and the performance of the subcontractors that they work with
  - holding data for the performance of each subcontractor separately rather than aggregating the data for each area of learning
  - engaging subcontractors fully in the self-assessment process so that lead contractors have evidence for the current performance and improvement plans of each subcontractor
  - ensuring that all learners and employers, including where training is delivered wholly or partly by a subcontractor, are aware of the role of the lead contractor.

## **The contractor–subcontractor model of delivering apprenticeships**

1. Apprenticeships have traditionally been delivered by independent learning providers, further education colleges, adult and community learning providers, and employers with their own direct contracts. These afforded them full responsibility and clear accountability for delivering all parts of the



apprenticeship. The Skills Funding Agency, which has responsibility for funding apprenticeships and other adult skills programmes, introduced a minimum contract level to the value of £500,000 with effect from the 2011–12 contract year. This meant that smaller training providers with contracts below this level would no longer be funded directly, unless they were able to be granted an exemption for 2011–12. In order to continue to offer training, providers had to make alternative arrangements to access funding. The options for these small providers included:

- selling their business or merging with another provider
  - entering into consortium arrangements with other providers (forming a 'training group')
  - finding a lead contractor to secure and channel funding.
2. Whether through consortia or through a lead contractor, some form of management costs would be involved. Lead contractors were in a position to charge smaller providers a top-slicing fee as a percentage of the contract value in return for allowing them access to the funding and supporting them in their work.
  3. Over 300 smaller providers previously with their own contracts made alternative funding arrangements in 2011-12 in order to continue to provide apprenticeships. Subcontracted apprenticeship provision visited as part of the survey also included a number of providers who had not previously held their own contracts but were subcontracted for areas such as Train to Gain. They had subsequently moved to subcontracted apprenticeship delivery for their lead contractors.
  4. As part of these subcontractor arrangements, the lead contractors retain full responsibility and are accountable for ensuring that the obligations and requirements around apprenticeship delivery are met by any subcontractor they appoint. Such responsibility therefore requires robust due diligence and quality assessment in appointing new subcontractors, and rigorous monitoring to ensure standards set are maintained.
  5. From data available about the number of subcontractors holding contracts with individual lead contractors in May 2012, the number of providers subcontracted by individual colleges or individual independent learning providers ranged from as few as one to as high as 92. This includes all provision, not just apprenticeships. The large majority of providers who acted as lead contractors, however, had between one and five subcontractors.
  6. Although the Skills Funding Agency does not impose a maximum percentage fee that contractors can charge under these arrangements, its guidance at the time of the survey visits stated an expectation that this should not exceed 15%

of the value of the contract without 'a detailed explanation'. Despite this, half of the subcontractors in the survey had not been able to obtain a satisfactory explanation why one lead contractor charged almost double that of another that they dealt with, for delivering the same apprenticeship programmes to the same standard.

## **The nature and quality of apprenticeship programmes**

### **The employment status of apprentices**

7. A quarter of the apprentices interviewed were unclear about their employment status. This is a significant concern when the study of employment rights and responsibilities forms a compulsory part of all apprenticeship frameworks. Some apprentices were confused about the types of contract they were working to and whether they had been engaged on an apprenticeship learning contract rather than a permanent employment contract. Of the apprentices responding to the online survey, 66% believed their job was permanent
8. Of the apprentices questioned during the survey visits, those in health and social care, engineering, construction and hairdressing were almost always permanently employed or taken on as permanent employees at the end of their apprenticeships. This contrasted with sports leadership where data for one subcontractor showed only 9% of apprentices staying with their employer, with most employers taking on new apprentices to replace completers; and at another subcontractor, only a quarter of IT apprentices interviewed expected to be employed on completion of their apprenticeship.

### **The duration of apprenticeship programmes**

9. The Department for Business, Innovation and Skills, through the NAS, has stipulated that from August 2012 all apprenticeships for people under the age of 19 should last at least 12 months. Less time may be required for adults who can call upon relevant work experience, but under no circumstances must the delivery be less than six months.
10. There was some confusion among the providers visited about the requirement to take at least 12 months to complete an apprenticeship. Several providers had interpreted the 12-month rule as an absolute rather than a minimum.
11. The subcontractors visited were generally working towards extending all apprenticeships to at least a year by August 2012. The areas commonly delivered more quickly included IT, retail, leisure, customer service and business administration. Areas such as construction, engineering, care and hairdressing were delivered over longer periods, sometimes over a number of years.
12. Responses from the online survey of apprentices showed that the majority (73%) of their apprenticeships last a year or less. More than a third (37%) of apprenticeships lasted six months or less; and a similar proportion (36%) lasted

more than six months but less than a year. Only around a quarter (24%) of apprenticeships lasted more than a year.

13. Short-duration programmes do not allow all apprentices sufficient time to practise and apply their skills at work. If apprenticeships are being completed in a short period of time, this strongly indicates that, in some cases, the process is one of accrediting existing skills rather than developing and extending apprentices' skills, knowledge and understanding.
14. 'Rapid' delivery, that is of less than a year, seen during the visits included the following examples.
  - Advanced IT apprenticeships were advertised as a fast-track advanced apprenticeship lasting between seven and nine months. Learners interviewed felt an increase to 12 months would have been beneficial, particularly in embedding their newly acquired skills.
  - One subcontractor was delivering accounting apprenticeships in intense blocks of training. Two new delivery models had been designed to comply with the 12-month rule and were being rolled out. However, employers and learners were unhappy with the change as they found that the current fast-track model was very effective and fitted with their needs. A separate, fast-track learner-responsive model had been designed to cover levels 3 and 4 in a year rather than the traditional two or three years.
  - Advanced apprenticeships for sales of residential property, or lettings and property management took place on 'work placements' over 27 weeks. This programme was finishing as the subcontractor did not feel it was viable over a 12-month period and the sector did not want apprentices under the age of 19 who are often unable to drive and lack credibility with clients.
  - Care apprenticeships at one subcontractor lasted an average of nine months at intermediate level and 12 months for advanced programmes. The provider visited learners every three to four weeks to assess and coach. To meet the new 12-month requirement, the provider planned to visit every five to six weeks, simply extending the time between visits.

## **Delivering the components of the apprenticeship programme**

15. The subcontractors interviewed had a good understanding of the need for their programmes to comply with the SASE requirements. The apprenticeships sampled in the survey generally met the minimum requirements of SASE, but with some variation in how guided learning hours were interpreted. Subcontractors were moving towards methods of delivery where guided learning hours were recorded to ensure all apprentices received at least the minimum requirement of off- and on-the-job training. By doing this, subcontractors were also satisfying audit requirements.

16. Evidence from the survey visits and from inspections indicates that an increasing number of apprenticeships are being delivered almost entirely in the workplace to save delivery costs and to minimise disruption to employers when staff are absent. Many apprenticeships rely on learners completing self-study or training with their employer, but with little input from their visiting assessors. Some good use of electronic learning resources was seen in four providers visited; some had been developed in-house and, in two cases, through accessing a lead contractor's college 'moodles' (electronic learning resources held on an intranet). Such access by the subcontractor to the resources held by a contractor, however, was the exception rather than the norm. One college allowed access for the subcontractor's staff but not the apprentices, despite the fact that it had responsibility for the apprentices as students of the college.
17. There are major differences in the learning experience of apprentices. These are determined largely by the vocational areas in which they are working. Apprentices in areas such as construction, engineering and hairdressing received traditional off-the-job training where they attended taught theory classes, received practical training and had the chance to mix with and to share work experiences with other apprentices.
18. Despite these positive features, the survey found some poor practice that was not dealt with sufficiently well by lead contractors. For example, although the off-the-job training for IT with one subcontractor was structured well, the apprentices were concerned that they had had five different staff during the seven-month training programme. Such poor continuity in terms of staffing had a negative impact on their learning.
19. In areas such as customer service, retail, and care, most of the theory and practical training for NVQs and technical certificates happens at work, with apprentices using workbooks or other resources and without the benefits of mixing with apprentices from different employers. Subcontractors claim that assessors coach learners to develop the skills and the understanding to complete their workbooks. However, when this was explored in interviews with apprentices, many of them felt that the focus of their assessors was much more on assessments than on developing their knowledge.
20. There were examples of good training delivered in the workplace:
 

A security subcontractor with a wide geographical spread of apprentices delivered training in the workplace through individual or small group sessions. Assessors drew on a bank of resources and tailored the curriculum to the individual's prior learning and needs. All the apprentices interviewed had received individual training at work or off the job; some were even visited at home when a suitable learning environment was not available at work.
21. Just over half (52%) of the apprentices interviewed in the survey visits did not receive regular, traditional off-the-job training away from the workplace. When

they did, it was typically through specific workshops for aspects such as technical certificates or key/functional skills. Training was often delivered on the job by employer's staff with support from the provider's staff.

22. The picture of the amount and frequency of off-the-job training was more positive. Almost three quarters (73%) of those responding to the online survey reported they had off-the-job training. Among those who had off-the-job training, 63% had it once a week or more. Four fifths of respondents (81%) also saw their assessor from their training provider at work once a month or more. Three quarters of these apprentices said they were experiencing mainly a traditional apprenticeship model with a mixture of on- and off-the-job training. Eighty-six per cent of respondents received theory and practical training at work and written feedback from their assessor that they felt helped them to improve. Just over three-quarters of respondents (77%) felt that they were improving their English and mathematics as a result of their apprenticeship training.

This case study describes very effective delivery of apprenticeship training entirely in the workplace.

All the apprentices at one large care subcontractor had a clear allocation of time to study as well as a planned individual visit by their assessor. They met individually, either in a quiet area of their work or at home, for as long as it took to cover a topic. Several apprentices also had extra support for literacy and numeracy from a basic skills tutor. All those interviewed had received good enrichment from the training provided by their employer – not just mandatory areas but also aspects such as end of life care or palliative treatment. Although this method of training was very effective, apprentices still missed out on the chance to interact with other apprentices from elsewhere, and therefore missed the opportunity to hear about work practices at other employers.

23. It was the norm to have no formal training sessions linked to personal learning and thinking skills (PLTS) and employment rights and responsibilities (ERR) as they were embedded in the NVQ. Part of the apprenticeship framework covers ERR and many of the apprentices interviewed had an apprentice workbook to complete. However, ERR was not generally monitored during progress reviews. Understanding was rarely formally assessed and apprentices received little feedback on how to improve their knowledge, understanding and skills.
24. The subcontractors delivered key and functional skills alongside the NVQ through a mixture of taught classes, one-to-one tuition, workbooks or electronic resources, and assignments. Where programmes were delivered mainly in the workplace, the most concerted coaching from assessors was seen in preparing apprentices for online testing rather than as part of their taught programme.

Almost all the employers said that English and mathematics were important to them and they supported their inclusion in apprenticeship frameworks.

25. Almost every apprentice interviewed understood that the subcontractor, together with the employer, was responsible for the delivery of their training. In a small number of cases, the role of the employer was less clear, although the apprentices were still benefiting from training with their employer. The role of the lead contractor in delivery, however, was generally far less well understood, even though some lead contractors had conducted initial assessments and made resources available for apprentices to use.

### **Building on existing skills**

26. Evidence from the survey visits presented a mixed picture about the extent to which programmes did more than simply accredit existing skills. The survey found several examples of apprenticeships that, in the main, were accrediting existing skills.
- Four of the subcontractors acknowledged that some adult learners already had the required skills for apprenticeship frameworks
  - One subcontractor identified some instances where reduced funding had been agreed with its college lead contractors to provide shorter programmes for adults who already had recognised skill levels and who therefore did not require as much funding to complete their frameworks
  - Many care apprentices with one subcontractor already had the skills they needed to perform their job. Half of the learners interviewed were already employed by the employer before they started their apprenticeships. One learner had been working for 11 years before starting an advanced apprenticeship. One already experienced intermediate apprentice said: 'The apprenticeship does not challenge me. Too much of the work is covering old ground.'
27. In areas such as construction and engineering, most apprentices had little or no previous experience before starting their programmes. The programmes were demanding and challenging. Two subcontractors in construction provided effective literacy and numeracy support using fully qualified support teachers in taught classes, but most of the apprentices interviewed were supported by their subject assessors. Adults usually completed the key/functional skills aspects of frameworks – and gained clear benefits from achieving these – because their previous qualifications were usually out of date and therefore did not qualify them for exemption.

### **Quality assuring assessment**

28. Around three quarters of the apprentices interviewed were receiving more than the contractually required quarterly visit. Most of the apprentices had a good idea of where they were in their programmes and what they needed to do next,

although what was recorded in reviews was often too broad and not broken down into smaller, easily achievable targets.

29. The online survey of apprentices found that two fifths (41%) of respondents met their assessor formally more than once a month to review their progress and set targets. A similar proportion (38%) met their assessor once a month. Eleven per cent of respondents met their assessor to review their progress every six weeks or less. Overall, 7% of apprentices met their assessor every three months, with 3% of assessors exceeding the three-monthly contractual target.
30. Over four fifths of the apprentices interviewed were being assessed regularly in the workplace by subcontractor staff, using evidence from employers such as work products (examples of work completed by learners) or witness testimonies about the work the apprentice had produced. Professional discussions took place between assessors and apprentices which were recorded or minuted, allowing apprentices to demonstrate their understanding of an area.
31. These apprentices were largely positive about assessment in the workplace, with easy access to assessors being widely reported. Around half of the apprentices interviewed felt assessors would respond positively to ad hoc requests for assessment, particularly if they were falling behind in meeting their targets.
32. The online survey found that two fifths (39%) of apprentices got assessment evidence for the NVQ element of their apprenticeship from a mixture of off-the-job and workplace training, which is the ideal scenario in delivering a good apprenticeship programme. However, just under a fifth (18%) got their evidence only from the off-the-job centre, with the risk that insufficient account was taken of their performance in the workplace. The remaining 43% got their evidence only from work, which is often an indicator of assessment-led training.
33. The following examples of assessment practice seen during the survey typify good and poorer practice.

### **Good practice**

- Portfolios reviewed for construction apprentices had clear records that the quality of assessment decisions had been checked by a designated internal verifier and there were detailed comments that would help the apprentices improve their future performance.
- Care apprentices had good access to assessment. Assessment activities were well organised and appropriate to their needs, and assessors visited them frequently, in some cases every week. Apprentices were observed working and they contacted assessors between visits if they needed additional help or advice.

- In construction, learners, employers and assessors need some flexibility as jobs arise or are cancelled. Several employers were able to take on apprentices who worked for other employers when apprentices needed a particular piece of work to be assessed.
- A security company required a stronger internal verification system which it provided by increasing the numbers of internal verifiers (IVs). Security assessors visited apprentices approximately every four weeks (this varied between three and six weeks). There were four assessors and three IVs ensuring that IV activities were timely. The more experienced lead IV was an external consultant employed by the college lead contractor to assure the quality of the programme. The assessment practice was appropriate and the internal verification for apprentices was good.

### Poor practice

- The observation of workplace activities was insufficient. Although assessors visited learners in the workplace regularly, they did not conduct sufficient observation of learners' trade skills and there was too much reliance on documentary evidence, such as witness testimonies.
  - Some portfolios from care apprentices relied too much on large quantities of evidence from professional discussion rather than the assessor's observation of actual practice.
  - In accountancy, the competency-based assessments were weak, with an over-reliance on the employer signing off an apprentice's 'passport' to confirm they had completed work. The passports seen tended to capture what activities had been done but not the standard to which they were being completed.
34. Several of the subcontractors in the survey assumed that limited observation of apprentices was acceptable because of the high costs involved in this. If assessment is to be rigorous, the extent to which witness testimonies from employer managers who are not assessors are used needs to be more carefully controlled. Such evidence needs to be supplemented by independent observations by subcontractor assessors.
35. Three subcontractors who had difficulty recruiting appropriately qualified internal verifiers for a particular subject area had recruited suitable part-time staff to carry out the internal verifications. The better provision seen in the survey had extra IV staff and planned schedules a year in advance. Meetings to share good practice helped to standardise the quality of assessment judgements being made by the subcontractors. In two cases, the lead contractors adopted some of the good IV practices of their subcontractors.



## The management of subcontracted partners

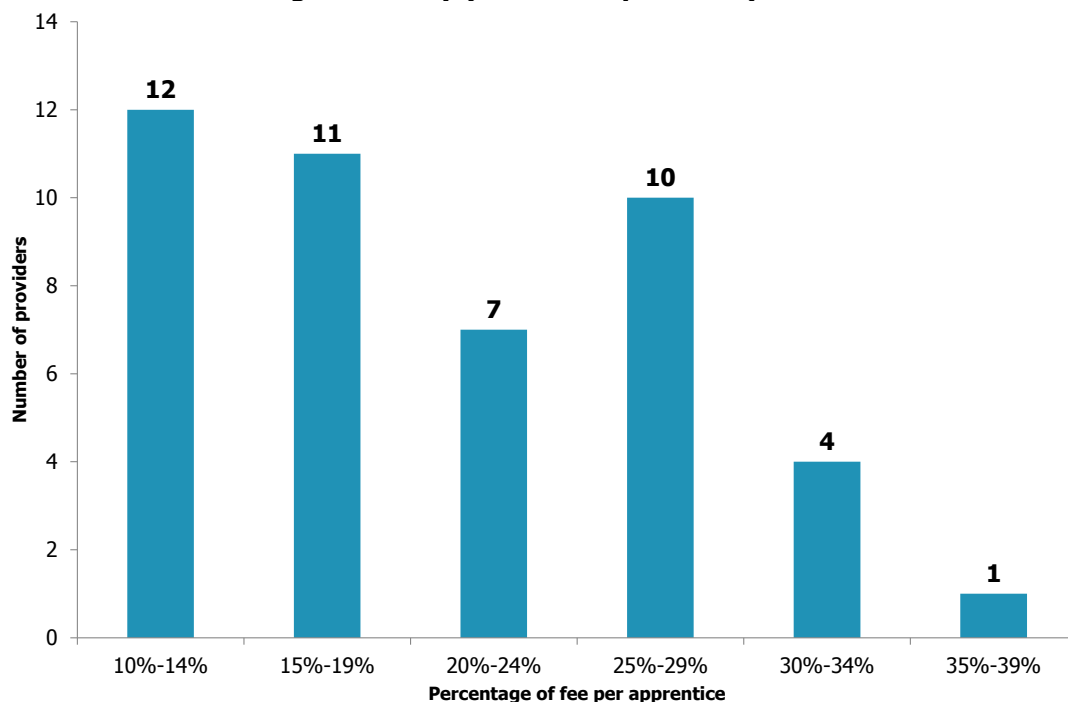
### The selection of subcontracted partners

36. Some good practice was seen during the survey in how subcontracted partners were chosen. Some colleges saw their subcontracted work-based learning as a way of meeting the needs of employers and the local community. In the best cases, they sought partners to deliver provision in areas in which they had no expertise, after receiving enquiries from employers that could not be fulfilled internally.
37. There were also instances where groups of work-based providers had formed umbrella bodies through which to channel funding. All the partners were expected to meet a set standard, with success rates and Ofsted inspection judgements used to determine eligibility.
38. In the worst cases, colleges and larger independent learning providers sent mail shots to small independent learning providers who fell below the minimum contract level, regardless of where they were located in the country or what areas of learning they were offering. Managers from at least three lead contractors who were interviewed during the survey could not give coherent reasons for selecting their partners as subcontractors.
39. All the lead contractors interviewed had some form of due diligence in their choice of subcontracted partners. Factors examined and taken into account included: previous training experience; previous performance data; external verifier reports; Ofsted reports; financial reports; company searches; and references.
40. Several accounts were given of potential subcontractors who had been rejected by lead contractors for reasons such as the fact that they employed apprentices themselves (they were not truly employed); that they were putting apprentices through a rapid training scheme (not allowing apprentices the chance to embed and develop knowledge and skills); or taking on older learners as apprentices who did not need training. These are serious matters and suggest there might be value in some form of 'hotline,' run by a body such as the NAS, so that concerns identified when reviewing potential subcontractors could be reported by the lead contractors in case the subcontractors in question gain a contract elsewhere.
41. Evidence, both from the survey and recent inspections, shows that colleges that have been involved in franchising their (often large) Train to Gain provision have recently strengthened their due diligence procedures. As many move towards offering apprenticeships in larger numbers, they want to test the quality of their partner organisations. One large college conducted a review of its subcontractors and now works only with four of the original 22 providers.

## The impact of management fees on the subcontractor

42. Of the 45 lead contractor fees charged to subcontractors in the survey, just under half (22) were above the the Skills Funding Agency expectation that a maximum fee of 15% of the contract value be levied for contracts in place in 2011–12 (Figure 1) unless there were valid reasons for doing so. Higher fees go against the intended spirit of the management of subcontractors and reduce the funds available for delivering apprenticeship programmes.

**Figure 1: Percentage of fees per apprentice paid to lead contractor in subcontractor providers visited during the survey (number of providers).**



The data do not include four providers who held subcontracts with a training group where the fees paid were at a cost reflecting the non-profit making subcontracting arrangement.

43. The impact of contract management fees was seen in one subcontractor who had previously held its own contract. With a contract of £375,000 for apprenticeships, it was now below the minimum contract value. It works with a lead contractor who charges a management fee of 12%, equating to £45,000 in annual fees, reducing what is available to deliver the contract to a net value of £330,000. Although the lead contractor took on some of the administrative duties previously carried out by the subcontractor, two members of staff were lost as a consequence of the reduced income.

## Managing and quality assuring the work of subcontracted partners

44. The quality assurance of subcontracted provision varied widely. A high proportion of that seen in the survey was inadequate or barely satisfactory. There appears to be little or no link between contract values and the ability to

quality assure the work of others. Although observation is supposed to be a part of most lead contractors' procedures, it was often infrequent and not done well; it did not always cover the key processes of work-based learning.

45. The following three examples show where the lead contractors did not have sufficient internal expertise to rigorously quality assure the work of their subcontractors.
- A college that has procedures for franchising for over 15 years conducted rigorous observation of both off-the-job training and assessment. However, it was unaware that none of the contractual reviews of learners were taking place in the workplace, but were carried out away from it on training days. Employers received reports on the progress of their learners but could not be adequately involved in the joint delivery of training. The subcontractor's reason for not carrying out reviews in the workplace was the cost of travel and staff time.
  - A national construction provider used a subcontractor to deliver complex technical certificates. Quality assurance arrangements included quality monitoring visits where observations of teaching and learning were completed and the records discussed with the teacher. However, the person undertaking the observations was not a teacher. This was evident in the records seen, which demonstrated, for example, the lack of sufficient evaluation, indicating that the observer did not understand his role. The teacher received feedback such as 'that went well' and little else. No grades were given.
  - In one college, subcontractors were visited every three months. An audit of learners' and claims paperwork on one visit alternated with observations of training on the next visit. Although the subcontractor visited was good, the four visits and the activities conducted were not sufficient to assure the quality of training. This relied too much on learners doing their own research with very limited formal input from assessors.
46. The following is a good example of how three lead contractors managed a good subcontractor effectively.

Quality procedures and performance targets were set out clearly in the very robust service level agreement: two of them stated a minimum target of 80% overall success rate and the third stated 90%. Meetings – ranging from monthly to bi-monthly – were followed up with a report. Two lead contractors had sent in independent auditors to check compliance and one had a quality team to make observations. One contractor also observed the training given by employers. All three contractors observed teaching and learning but also used the subcontractor's records. All three contractors held the master copy of the learners' files and the subcontractor used electronic copies of documents. Learners' progress

reports were sent monthly. One contractor carried out spot check telephone calls to learners every month. Two contractors charged management fees of 15% and one 20%, depending on the services they offered and the support they gave. All judged the subcontractor to need very little support.

47. In contrast, a security training specialist working with two lead contracting colleges found that one college charged a management fee of 15% while the newer college contractor took 25%, explaining that this reflected the risk involved in a new contract. It emerged that the first contractor was not only the less costly but gave greater value through providing expertise in the form of a member of staff as an internal verifier. The second college had audited files but had not looked at the quality of delivery. It provided a poor service despite taking a quarter of the funding for the apprenticeship programme.
48. In the following case studies, the first illustrates effective practice and the second illustrates the consequences of poor practice.

This case study describes an established lead contractor–subcontractor model that works very effectively to promote apprenticeships, providing apprentices and employers with good training that meets their needs.

A Training Group established in 2001 is a not-for-profit company limited by guarantee. It manages a very large consortium of subcontracted training providers based in the West Midlands and further afield; of 43 providers in total, 27 deliver apprenticeships. (Other programmes include Train to Gain and pre-employment support for those not in education, employment, or training.) Subcontractors are a mix of small and medium-sized private providers, delivering either multi-sector or specialist single-sector skills training in most areas of learning.

It has moved away from Train to Gain towards programmes where young people are able to acquire practical and theoretical skills, tailored to employers' needs. Employers do not want apprentices who are already fully 'job-ready', but those who can learn practical/theoretical skills while also being moulded into each employer's culture, practices and ways of working.

The selection of partner subcontractors is robust. The extensive due diligence has ensured that no contracts have needed to be terminated in 11 years. Arrangements for contract management and quality monitoring are extensive. Each subcontractor is risk-rated (red–amber–green) on the basis of performance to contract; outcomes of observations; health and safety; audit/compliance outcomes; financial control; accuracy of claims; and performance against equality and diversity impact measures. In addition, there are a number of key performance indicators for the Training Group and each subcontractor. These are:

- no individual subcontractor to be below 75% timely success
- no subcontractor to be below 65% positive progression (further qualifications, promotions, etc.)
- at least 88% of learner and employer feedback to be rated outstanding or good
- a minimum of 90% of observations of teaching and learning to be graded good or better
- at least 90% of employers to identify a measurable positive impact of the training on their business.

Observations of teaching and learning (OTL) arrangements are well developed with clear grade criteria. The Training Group undertakes an annual OTL of each subcontractor for each of five stages: initial assessment, induction, reviews, off-the-job delivery and exit reviews. These are in addition to each subcontractor's own OTL arrangements. The Training Group works directly with each subcontractor to improve any aspects identified as underperforming and, specifically, any subcontractor where the overall judgement was 'inadequate'. Paired observations have recently been introduced – moderated at the time of the OTL – and a peer review group has been established. The frequency of contract management meetings, at least quarterly, is determined by risk ratings, and meetings take place alongside frequent daily/weekly contact by email, telephone and drop-ins. The Training Group gathers learners' and employers' views directly through monthly learner and regular subcontractor surveys.

The Training Group actively markets apprenticeships through 'apprentice showcase' events. The most recent, held at Wolverhampton FC, attracted over 1,000 young people with their parents, and included active taster sessions provided by major employers such as Jaguar/Land Rover and Carillion.

This case study describes a subcontractor that previously offered only Train to Gain programmes. It now offers apprenticeships in the care sector. It delivers training in the Midlands over 100 miles from its single lead contractor and is not being adequately monitored or supported.

The subcontractor has appropriate experience, staffing and contacts with employers in care. All apprentices were fully aware of their employment status and were all employed as apprentices or full-time employees. They worked for good employers who had committed to employing apprentices on completion of their apprenticeship.

Compared with Train to Gain, the staff were not sufficiently experienced in delivering apprenticeships with the extra training that was involved.

Initially, they set an unrealistic target to complete in six months for their first apprentices in February 2011; this increased to nine months when it could not be achieved and then was subsequently changed to 12 months. The contractor did not identify the unrealistic target completion dates early on when learners' paperwork was submitted and nor did it offer guidance to help the subcontractor at the six-month stage.

Half the learners had considerable prior experience and skills. Some of them felt that they were not challenged as they were not learning new skills. Although the learners had good access to assessment, with assessors visiting learners frequently, the observation of workplace activities was insufficient with an overreliance on documentary evidence.

The contractor charges the provider a management fee of 22%. Although extensive checks were conducted to evaluate the provider's ability to deliver apprenticeships, there was too much reliance on the experience of delivering Train to Gain. Almost 18 months after the start of the contract the provider does not have a reliable and effective management information system. This was not identified at the stage when the contract was allocated. The contractor said that it quality assured the programme through monthly contract management meetings, together with visits to the provider to conduct observations, and compliance checks of documentation, including learners' assessment records and reviews of external verification records.

In reality, the contractor has conducted one observation of teaching and learning in 15 months for a provision with 273 learners. The provider did not hold a record of the observation. Outcomes of quality assurance activities are discussed at monthly contract meetings. Records relating to these meetings were not held by the provider, although the meetings are audio-recorded. No action plans are produced after the meetings. The provider's self-assessment report was not comprehensive: some of the judgements were not accurate or they were based on insufficient evidence. The contractor's staff were aware of this, but were unable to produce any action plan or evidence of support for the provider to develop its capacity to evaluate its own performance accurately.

There has been insufficient management of the provider by the contractor to tackle underperformance in terms of timely success. Action-planning to improve learners' progress is ineffective and the strategic improvement plan is not sufficiently robust, lacking measurable targets. A recently developed management information database for monitoring learners' progress is ineffective and does not easily identify underperformance, either at assessor level or by vocational sub-area.

49. Lead contractors raised few issues as a result of their quality monitoring of subcontractors, indicating an overreliance on their audit of performance measures rather than an accurate review of the quality of provision. The

recurring issue raised by the quality monitoring of contractors was around timely success of apprentices. Subcontractors often had high overall success rates but lower timely success rates.<sup>2</sup> Although this had been identified as a concern, no detailed plans were seen that would tackle the problem.

50. Although many of the better lead contractors had conducted observations of teaching, few had used these to help improve the performance of teachers at their subcontractors.
51. Some of the lead contractors interviewed did not have sufficient expertise in work-based learning to monitor quality effectively. One college lead contractor engaged a consultant to evaluate its provision. Although this gave it a more informed 'snapshot' picture of its subcontracted provision, it was costly and still left the college without continuing expertise to monitor the provision. Another subcontractor was horrified when it enquired about the cost of the consultant which it was indirectly paying for.

This case study describes a subcontractor that was not ensuring that all of its apprentices were employed. Concern about this was not being identified adequately by lead contractors.

A subcontractor worked with seven lead contractors, all further education colleges, with contracts totalling over £2 million. A college lead contractor, visited alongside the survey visit to the subcontractor, had identified concerns about it. These included the use of accelerated training programmes (short periods of delivery) and the subcontractor's own employment of 16–18-year-olds. The subcontractor hoped these young people would get a job before the apprenticeship was completed, but terminated their contracts when the apprenticeships were completed without other employment being gained. Only 65% progressed to employment. Although these problems had been identified, at the time of the survey visit none of the lead contractors had terminated their contract with this subcontractor.

## **Subcontractors' views of their relationship with the lead contractor**

52. Discussions with subcontractors about how things might be improved generated frequent responses about improving the availability of teaching resources held by the lead contractor; allowing more free joint-training activities and having a clear contract that specified clearly the role of both the contractor and the subcontractor.

---

<sup>2</sup> Timely success rates record the number of learners completing their qualifications within the planned duration of their programmes.

53. The subcontractors in the sample surveyed did not resent paying a management fee if they felt they were getting something back. However, they felt that someone should be monitoring the value gained through subcontracting arrangements when significant sums were being diverted away from delivering training directly. The following examples illustrate the range of responses.

One construction subcontractor had two very different experiences for its apprentices with two college lead contractors. The first does not supply construction apprentices with college identity (ID) cards, meaning that learners cannot access the college learning support or library services. The college says apprentices do have access to these services, in theory; but in practice, because they do not have ID cards, this is not the case. The second college enables apprentices to access its learning support and study materials; each apprentice receives a pass card to allow access to the main facilities of the college.

A very large subcontractor (£10 million in contracts) is very clear about the positive relationship with its college lead contractors. Although the two colleges' approaches vary, both conduct observations, sometimes unannounced, covering all parts of the learner journey including reviews as well as off-the-job training. For an additional fee of +3% the subcontractor uses college premises for delivering training and for another fee of +3% uses computer equipment. This benefits the subcontractor as it eliminates investment in costly resources.

A care subcontractor works with two lead contractors that charge the same 12% management fee. The first lead contractor is much more thorough and knowledgeable; the second does not have sufficient expertise or systems to monitor the contract properly. The subcontractor is assisting the second lead contractor in developing these. The subcontractor feels that it is disadvantaged by not having its own Ofsted report, despite the large number of learners it supports. When it bids for contracts, it has no independent assessment of the quality of its work.

A construction subcontractor with five different lead contractors felt that partnership working is strongest with the three independent training providers that provide a mix of staff training, initial assessment, reviews, and literacy and numeracy support. The two college lead contractors do not offer the same level of service and yet charge 5% more.

A care subcontractor that had only recently moved from Train to Gain to apprenticeships and that dealt with one lead contractor only, felt it was being well supported. In reality it was not being well monitored or given



sufficient support to improve, but it had only the one experience from which to make its positive judgement.

## **Underperformance by lead contract holders in apprenticeship provision**

54. The performance of lead contractors does not appear to have any bearing on their suitability to act as a lead contractor. Of four London colleges that featured as lead contractors in this survey, three had overall success rates below national averages.
55. Inspectors analysed the success rates of 30 London colleges to see how well work-based learning was being delivered in the capital. Performance for London colleges is eight percentage points lower than the national average for overall success and six percentage points for timely success. Ten of the colleges had performance equal to or better than the national average; the remaining 20 were underperforming against this measure. Within the underperforming group, some of the performance is poor. In one college, only six of 40 leaving apprentices completed in 2010–11, with only one of the apprentices completing within the planned time. Only one of the 24 construction apprentices completed successfully.
56. A London college inspected in 2012 that had underperforming apprenticeship provision increased the number of apprentices in the academic year (2011/12) from 290 to nearly 900 at the time of the inspection, despite low success rates (at just over 50%).
57. Data show how another college has been able to improve its overall apprenticeship success rates from 64.9% in 2009–10 to 80.0% in 2010–11 by subcontracting new apprenticeship training in Devon, the East of England and the West Midlands where subcontractor success rates were 97.6%, 100% and 92.3%, respectively.

## **The views of apprentices**

58. The 110 learners interviewed were mostly positive about their experience as apprentices. The highest levels of satisfaction were associated with the more difficult programmes that involved greater amounts of traditional off-the-job teaching, such as construction. The lowest levels of satisfaction were for programmes where much of the training is on the job, such as care, leisure, travel and tourism, and supporting teaching and learning in schools. Satisfaction levels for IT were also low, possibly because of the limited chances for apprentices to put what is learnt into practice with real work. Twelve IT apprentices at one subcontractor said the programme delivered what they expected but they were concerned about the high turnover of the IT trainers and thought the programme could be longer.

59. Eighty-nine per cent of the 500 respondents to the online survey agreed that their apprenticeship lived up to their expectations and they would recommend it as a good way of gaining qualifications. This is supported by the largely positive feedback from the online survey's open question, which asked respondents for comments about their apprenticeship. They considered it to be a valuable experience that allowed them to develop skills while earning and gave them a step into the job market.
60. Many also argued that apprenticeships should be promoted better and held in more esteem than they are currently. Some negative comments were also provided. These focused largely on the low pay for apprentices and how some saw themselves simply as cheap labour for their employer. Others noted that their employer showed little interest in them and that they received little or no support during their programme.
61. Over four fifths of the apprentices interviewed had been asked their views on their training experience by the subcontractor that was delivering their training. Around a fifth said they had been contacted by the lead contractor, either by telephone or written survey. Survey fieldwork showed that some subcontractors had better developed systems for gathering feedback than their lead contractors.
62. The online survey reported that three quarters of respondents said they had been asked for their views on the quality of their apprenticeship, which implies that many training providers make an effort to evaluate the programmes they manage. Conversely, it also suggests that a quarter of respondents have not been asked for their opinion on their apprenticeship.
63. Almost all the apprentices interviewed were aware of what actions to take if they wanted to make a complaint about their apprenticeship. However, the role of lead contractors in receiving complaints was not fully understood.

## **The views of employers**

### **Supporting employers' apprentices**

64. Nearly all the 40 employers interviewed had little or no understanding of the role of lead contractors in the arrangements for training their apprentices. To a greater or lesser extent, they were generally aware of the subcontractor. Care employers had a good understanding of their subcontractor's role in providing support. However, only in two cases were the employers aware that the lead contractor was responsible for funding and the oversight of the quality of training.
65. Around three quarters of the employers interviewed had some previous knowledge of the training provider being used. This could be through a long history of using them to train staff (particularly in care and engineering) or through local reputation among employers. The most common reason given for

choosing a provider was quality of training and, in some cases, being able to help with the recruitment of apprentices.

66. Six employers gave details of previous poor experiences with training providers that had made them wary of training their employees through apprenticeships. The common factors mentioned were poor communication, few visits to the workplace and several changes of assessor, resulting in limited assessment and training.
67. Around three quarters of the employers had some involvement in reviews that took place. However, the employer representative involved in reviews was not always the most suitable person to carry out this role, particularly when he or she had insufficient day-to-day contact with the apprentice.
68. Most of the employers were actively involved in some aspects of the training and assessment of their apprentices. There were exceptions. One employer interviewed as part of a survey visit, despite being nominated by the subcontractor, appeared to know very little about how the apprentice was being trained or their role in it. On the other hand, another employer with the same subcontractor spoke to the apprentice every week to find out what he was doing and then tried to support, through work and on-the-job training, what was being learnt.
69. The online survey found that 87% of the apprentices responding said that their workplace assessor participated in progress reviews.
70. A large number of the employers interviewed had no recollection of any formal attempt to gain their views on the quality of their apprentices' training but said they would tell the assessor if they were unhappy about any aspect. Around half of the employers felt they had been asked their views at some stage.
71. Return rates of survey forms are notoriously low for employers; to counteract this several subcontractors used visits by managers and telephone surveys to gain employer feedback. One subcontractor telephoned all its employers. Two subcontractors had an effective plan for sampling employers' views. Around half of the lead contractors routinely discussed the feedback generated by the subcontractor during their contract management meetings.

## Notes

Visits to 17 apprenticeship providers working under subcontracting arrangements were carried out in May 2012. During these visits 110 apprentices and 40 employers were interviewed. The subcontractors were chosen from Skills Funding Agency lists to reflect a range of provision, different sized contracts and a range of lead contractors. Some of the subcontractors had previous experience of delivering

apprenticeships for themselves or others; some were new to this work, having previously delivered NVQs as part of Train to Gain provision.

Depending on the circumstances at the time of the visit, inspection activities included interviewing apprentices, subcontractor staff, workplace supervisors and employers. Inspectors scrutinised programme documentation relating to recruitment and outcomes, including progression to higher qualifications and sustained employment; programme design; reviews of progress; and assessment and accreditation (including the quality assurance of assessment). Inspectors also reviewed the formal mechanisms to manage and quality assure subcontracted provision by interviewing a lead contractor who travelled to the subcontractor for the survey visit.

Evidence was also gathered from seven inspections of further education and skills providers that were taking place at the time of the survey. These comprised four colleges, two independent learning providers and one employer provider, all of whom had their own apprenticeship programmes and had subcontracted apprenticeships to other providers.

A selection of inspection reports published since September 2011 was analysed. Apprenticeship performance data were evaluated for all London colleges and a sample of other colleges with large subcontracted provision.

An online survey of just over 500 apprentices was carried out for Ofsted by an independent company to give an overview of learners' views on their experience of apprenticeships.

## **Annex A: Further information on apprenticeships**

An apprenticeship is a job with an accompanying skills development programme. Employers, together with a training provider, will be centrally involved in its design, development and delivery. It allows the apprentice to gain the technical knowledge and real practical experience, along with the functional and personal skills, required both for their immediate job role and their longer term career. These are acquired through a mix of learning in the workplace, more formal off-the-job training and the opportunity to practise and embed new skills in a real work context. All these elements reflect the standards set out in the Specification of Apprenticeship Standards in England (SASE), reinforced through the individual apprenticeship frameworks and the job pathways and qualifications within them.

Providers have a key responsibility to ensure that apprenticeships are delivered to a high standard. This includes challenging or not engaging with employers who are unwilling or unable to contribute to a quality apprenticeship experience. These may be employers who are not looking to recruit into long-term positions but are merely using an apprentice as cheaper labour and looking to replace them with another apprentice when the original apprenticeship ends; or employers who are unwilling to give a commitment for the minimum duration of the apprenticeship or are unwilling to support, coach and mentor the apprentice, or pay at least the minimum wage appropriate for the age and stage of the apprentice.

SASE sets out the minimum requirements to be included in a recognised English apprenticeship framework. Compliance with SASE is a statutory requirement as set out in the Apprenticeship, Skills, Children and Learning (ASCL) Act 2009. SASE-compliant frameworks set out the expectations and detailed directions for the delivery of each apprenticeship. The majority of the frameworks have requirements in relation to guided learning hours well above the minimum levels in SASE and also give a clear indication of the length of the programme. Providers must ensure that their delivery models are structured to deliver these framework requirements.

At intermediate level, apprenticeship frameworks must specify the total number of credits which an apprentice must attain on the Qualifications and Credits Framework (QCF). This must be at a minimum of 37 credits. The framework must contain a qualification that identifies the competencies which the apprentice must achieve to qualify for an apprenticeship certificate, and which demonstrates competence in performing the skill, trade or occupation to which the framework relates at level 2 of the QCF; this is often an NVQ.

The framework must also identify a technical knowledge qualification that demonstrates achievement of the technical skills, knowledge and understanding of theoretical concepts; and knowledge and understanding of the industry and its market, relevant to the skill, trade or occupation to which the framework relates.

An apprentice must achieve (or have achieved) a functional skills qualification (or, equivalent) to either level 1 or 2 in English and mathematics and, where relevant, in information and communications technology (ICT). The apprentice must also achieve the standards of attainment set out in the Employee Rights and Responsibilities (ERR) national outcomes and the standards of attainment set out in the Personal Learning and Thinking Skills (PLTS) national outcomes. SASE also sets out expectations that apprentices should receive a minimum number of 'guided learning hours' of training, including a proportion away from the workplace. The interpretation of this off-the-job learning has recently been redefined as 'undertaken away from the immediate workplace e.g. in a different room'.

The **minimum duration** for the delivery of an apprenticeship for apprentices under the age of 19 is 12 months in all cases. This reflects the limited work skills and experience of this age group, giving them a real opportunity to gain experience beyond that limited to their specific job role. For older apprentices the same expectation applies that the duration set out in the framework document will be adhered to, with the same **minimum duration** for an apprenticeship of 12 months.

Only where there is accredited or recognised prior attainment and skills, and where public funding is reduced to reflect this, will completion be accepted for adults in less than 12 months. Under no circumstances can the delivery be less than six months. This minimum reflects the fact that they will be learning new skills and must have a minimum period in which they can really embed and enhance them.

All apprenticeship frameworks are linked to **specific job roles or occupational pathways**. Providers must work closely with employers to ensure that the apprenticeship offered is the most appropriate for the individual's job role and the employer's business. The **minimum hours of employment** for an apprentice should be at least 30 hours. **Employment** is a fundamental part of an apprenticeship and in this context is more than just having a contract of employment. An apprentice must be employed in a job role with a productive purpose, which will allow them to have the wider employment experience described previously, including developing an understanding of their employer's business and methods that could aid their future progression. The focus of an apprenticeship is on equipping individuals with the **new skills and learning** they need for their job roles and future careers. It is not a means simply to accredit existing work skills and experience. The initial assessment and consequent learning plan will be central in establishing and planning the delivery of new skills and learning. Employers have a key role in agreeing that the apprentice is able to apply the new skills in the full range of circumstances appropriate to the job.