

THE FURTHER EDUCATION FUNDING COUNCIL
Response to Consultation
MODERN APPRENTICESHIPS

Introduction

1 The Council has a strong commitment to raising standards of vocational education and training in order to provide for the needs of employers and regards the proposed modifications to Modern Apprenticeships as a significant step forward. The Council is pleased to have this opportunity to respond to the DfEE consultation document.

2 Overall, the Council finds the proposals contained in the consultation document to be beneficial and in line with recent changes introduced as part of curriculum 2000. The Council has concerns in two main areas, that of the proposed technical certificate and of quality assurance arrangements

3 Employers and school leavers are faced with a wide range of existing qualifications which some may see as confusing or overlapping. In introducing the technical certificate, seen as a significant step forward in achieving employer acceptance, it is important that further duplication is avoided by making use of existing qualifications rather than introducing more

4 The Council believes that quality assurance arrangements for Modern Apprenticeships should focus on the competence of the apprentices on completion. In the past there has been a perception that the criteria for achievement reviewed by external verifiers from the awarding bodies has been based largely on the completion of documentation rather than a review of the candidates overall achievements. It is suggested that this should be addressed by the introduction of a rigorous verification process that provides employers with confidence that every individual certificated as having achieved Foundation or Advanced Modern Apprenticeship status is competent in all areas covered by the scheme.

5 The following paragraphs comment on each of the questions set out in the consultation document.

1 Increasing the ‘taught’ element, underpinning knowledge and understanding needed for the job.

Q1 Are there currently qualifications broadly equivalent to technical certificates? What are they and can they be adapted to fulfill the aims set out above?

Summary Response: Yes, in many areas.

6 The Council would support the suggestion that where appropriate qualifications exist these should be reviewed and adapted to meet the design criteria for technical certificates.

Q2 To what degree will it be right to specify a schedule of teaching as well as a scheme of assessment in these qualifications, and to what degree of detail should this be done?

Summary Response: No summary response required

7 In developing the design criteria for technical certificates, the Council would wish to support the DfEE and Qualifications and Curriculum Authority (QCA) in ensuring that awarding bodies, national training organisations (NTOs) and those delivering the qualifications are satisfied that the needs of employers are being met. It will be important to provide rigorous assessment to ensure that young people are treated equitably.

Q3 Is it reasonable to class vocational A levels and vocational GCSEs as fulfilling the essential purpose of providing underpinning knowledge and theory, and if so should they be regarded as an alternative, for the purposes of modern apprenticeship completion, to a more specialised technical certificate?

Summary Response: No summary response required

8 The Council welcomes the proposal that the different routes for young people to pursue further study or employment includes explicit recognition of the vocational route. The individual needs of the young person should be taken into account in assessing whether the entrant has fulfilled the vocational education requirement for the apprenticeship. For some young people, it will therefore become evident that the vocational A level or vocational GCSE is for them a realistic alternative to the technical certificate.

Q4 In some sectors requirements for teaching and external assessment of knowledge are already features of their NVQ. It is reasonable in such cases to class this arrangement as fulfilling the purposes of a technical certificate, or would it be preferable to 'decouple' the theoretical from the practical elements? Are there other qualifications which already marry assessment of practical competence to occupational standards with the teaching and external assessment of knowledge?

Summary Response: No summary response required

9 The Council considers it reasonable where there are NVQs which already include requirements for teaching and external assessment to class this arrangement as meeting the purpose of a technical certificate. It is suggested that whilst the proposal might be reasonable in many cases, this should not be at the expense of quality. The appropriate quality standards should apply to the teaching and learning and assessment of knowledge element. There may then be some opportunity to consider separately certificating the learning and assessment of the knowledge element. The proposal to decouple the theoretical from the practical elements has some merit, as there is evidence to suggest that this meets student and employer demand in practice. An example is to be found in the childcare sector where the NVQ level 2 and level 3 cover skills training, and the underpinning knowledge and understanding are available and accredited as separate qualifications. It is understood that there are other qualifications which already marry the assessment of practical competence to

occupational standards, an example of which would be the CACHE Diploma in child care and education.

2 KEY SKILLS

Q5 Should the attainment of level 2 in communication and application of number be made a baseline requirement for the completion of an Advanced Modern Apprenticeship in respect of those entering from September 2001?

Summary Response: Yes

10 Provision at level 2 has been identified by the government as the basic platform for employability. In pursuit of the maintenance of this standard, the Council would support the proposal for the establishment of a national minimum for full attainment of the new key skills qualification at level 2 in application of number and communication as a condition of all Advanced Modern Apprenticeships.

3 Requirement for a specified period of off-the-job training in colleges or with other training providers

Q6 What positive or negative impact would this have?

Summary Response: No summary response required

11 The Council considers that the positive aspects of the proposal are that:

- it will enable the basic skills training needed by young people entering a working environment to take place in a closely controlled environment and to be provided by suitably experienced trainers
- if guidelines are issued for the content of the off-the-job element it will help promote the consistency that employers require
- it will help companies and providers to bring together economic numbers of apprentices for training
- it will facilitate the development of effective delivery schemes and sharing of good practice.

Nonetheless, there may be some negative effects if a specified off the job period of training becomes a requirement:

- if the amount of time is significant, this may reduce the amount of time spent by apprentices in-company and this may impair the development of the Apprenticeship as an employment-based training programme
- small and medium sized employers in particular may have greater apprehension about the effects on productivity taking account of the potentially disproportionate effect on organisations of their size; this may affect their willingness to participate in Apprenticeships
- it will be important to retain flexibility, for example, to accommodate industrial peaks and troughs throughout the year rather than stipulate a day a week, the amount of training could be in blocks that would

still meet the minimum requirement but may not be delivered in terms of a weekly minimum number.

12 The Council would support the suggestion that consideration should be given to alternative delivery methods. One example is to provide tuition via electronic means, either in the workplace or elsewhere.

Q7 How can this learning time be organised so it is most effective and least disruptive to employers?

Summary Response: No summary response required

13 Learning time can be organised by making the most of new and emerging technologies, to provide flexible solutions to meet the needs of individuals and their employers. The age range of the Modern Apprentice suggests that they would be familiar with new technology and would welcome the chance to experience and learn via the latest and most up to date means. An example of this might be to provide apprentices with a mobile telephone with access to WAP technology so that they might keep in touch with their employers whilst undertaking off the job training, and they might exchange views with other students in non disruptive ways e.g. text messaging. This would also provide individual Internet access. A sponsorship arrangement with the private sector for this capital equipment could be explored.

14 Initial guidance and assessment of the individual could include the opportunity to assess learning style, so that the individual who learns best in the morning using traditional books and reference materials could have his learning time organised so as to make the most of this. Full account should be taken of the needs of employers [and providers] when timing day release or block release, and providing options for timetabling.

15 A period of off-the-job training at the start of the programme might enable apprentices to be provided with basic skills and knowledge in working practices and statutory health and safety legislation, which all employees require, on entering the workforce.

Q8 Should the minimum period be confined to the requirements of the technical certificate and key skills, or should additional time be built in to give the opportunity for optional studies, recognising that this would be at the expense of on-the-job training?

Summary Response: Yes, the minimum period should be confined to the requirements of the technical certificate and key skills.

16 If Apprenticeships are to be seen as an employment based training programme the amount of time spent on-the-job should be maximised, to make the most of training time and to form the relationship between company and the apprentice.

17 Where there is space for more for an individual apprentice or within an Apprenticeship, the Council would support the provision of optional 'extension' or enrichment studies, including citizenship, foreign languages, sports, music and health

education. This should improve the overall employability of the individual apprentice, and increase their potential for transferable employment into other sectors.

18 The potential for the employer in delivering or providing for extension studies should be explored, as it is possible that existing in-company provision for other employees could be delivered to or adapted for apprentices.

19 The development of networking, both within companies and within economic areas, is seen by businesses as a valuable asset. Previous successful apprenticeships have encouraged networking by the facilitation of Apprentice Associations within local areas. Re-establishment of these associations by Local Learning and Skills Councils (LSC) may help to promote networking and provide a vehicle for optional activities.

4 An Apprenticeship Diploma

Q9 Would a formal Apprenticeship Diploma serve to enhance the public status of apprenticeship within the national education and training system?

Summary Response: Yes

20 For Apprenticeships to gain credibility in the eyes of employers and the public they will need to be seen as a well defined and effective skills and educational development package. A clear product identity will be a key factor in this success and this can only be enhanced by the adoption of a unique product identifier, such as an Apprenticeship Diploma. It will be important to show how the Diploma differs from existing awards, so as to differentiate it in a crowded market.

Q10 How could an Apprenticeship Diploma best admit qualification attainments gained in other contexts, so that it facilitates both progression and greater breadth of achievement for young people outside government-supported training as well as those on Foundation and Advanced Modern Apprenticeship?

Summary Response: No summary response required

21 If the Apprenticeship is to provide consistent national standards between providers and across different employment sectors whilst allowing for the differing needs of the sectors, it will need to comprise mandatory and optional elements of both educational and occupational competence. Careful consideration of the elements to be included in these categories will be required.

22 For example, the mandatory educational requirements should allow for the existing variety of vocational qualifications to provide different paths to accreditation rather than insisting on one approved qualification. This will require close liaison between employers, NTOs and awarding bodies.

23 For those training at Foundation level, it will be important to retain flexibility, and to recognise the achievements of those returning to learning. A system of credit accumulation built into or linked to Apprenticeships would enable young people to earn recognition for what they have learned in other contexts. This should facilitate

greater breadth of achievement for young people. Credit accumulation also allows for the recognition of achievement for those who may need to interrupt their studies for a time, for whatever reason.

5 Minimum Period Of Training

Q11 Can improved LSC inspection and quality assurance arrangements ensure training is done properly without the need for minimum periods of training?

Summary Response: No

24 Whilst providers should be encouraged to make use of new and innovative delivery methods to reduce the time taken to acquire skills and knowledge, the acquisition of work experience depends on the ability of the provider to make suitable experiences available and the rate of assimilation of the apprentices. Whilst this will vary for different circumstances it is reasonable to assume that this must involve a minimum period of time.

Q12 How can the minimum period be identified?

Summary Response: No summary response required

25 The Council's experience in the use of guided learning hours delivered as historical evidence for the "size" of a qualification is one which could be adapted by NTOs to determine the minimum duration of the educational and work related components of Apprenticeships.

26 In addition, NTOs have a bank of evidence on the duration of current training schemes and the Council can contribute evidence of the delivery times of the qualifications that it funds, many of which will be relevant to Modern Apprenticeships.

Q13 What other measures could be used to dissuade/prevent providers from pushing young people through training quickly?

Summary Response: No summary response required

27 One of the principle reasons for providers pushing young people through their training quickly is the size of the payment made on achievement. Providers may even be tempted to exclude apprentices whom they consider less likely to achieve the end qualification or complete the period of training or study, or enter them for study that is not sufficiently stretching for them. There may also be pressure to lower standards so as to ensure a higher pass rate. The percentage of total funding allocated to the achievement payment must be balanced carefully to provide a sensible level of motivation to achieve without encouraging claims for untimely completion.

28 Awarding bodies will have significant responsibility for accrediting final apprenticeship awards by carrying out consistent and rigorous verification of all providers, preferably by interviewing the candidates and examining students' work rather than simply reviewing the documentation. The Chief Inspector of the Training Standards Council (*Report 1999-2000*) referred to the inadequacy of internal

verification in 55% of providers inspected in the year and he expressed concern that some providers are contacted so infrequently by external verifiers that the awarding bodies have little current information about standards. Awarding bodies and training providers should therefore be encouraged to work more closely together. The QCA has issued a common code of practice for awarding bodies, setting down criteria that govern assessment, awarding and other matters affecting quality and standards. These standards should be carried through to relationships with centres and providers

6 Entry Requirements

Q14 Should entry requirements apply to Foundation and/or Advanced Modern Apprenticeships?

Summary Response: No Foundation Apprenticeships
Yes Advanced Modern Apprenticeships

29 Whilst Modern Apprenticeships are rightly focussed on school leavers they should also allow for learners who come to see their value slightly later in life. One criticism of previous apprenticeships was their age exclusivity, which prevented older learners from attaining “indentured apprenticeship” status. To overcome this disincentive there could be a range of entry requirements that recognise the value of previous working experiences.

30 For the Foundation Apprenticeships, there may be some young people including those with learning difficulties and/or disabilities who may have basic skills needs in one area whilst being competent at a higher level in another key skill. These young people may also have experience of vocational provision post 14 and may have a flair for practical training, which would outweigh their basic skills disadvantage. The entry and guidance system should recognise individual needs and aptitudes at this level and be flexible enough to take some young people on who could benefit from the experience. The Council would support the suggestion in the consultation document that pre-entry testing and work ‘tasters’ may be useful ways of assessing aptitude and interest at the outset. It is acknowledged that this may mean many providers of training having to improve their initial assessment procedures, another concern highlighted in the recent TSC annual report.

Q15 Should the entry requirements explicitly include reference to the basic skills of literacy and numeracy?

Summary Response: Yes

31 Whilst the Council would support a general requirement for basic skills, it is suggested that this should be interpreted to allow for exceptional circumstances, such as where a young person has attained basic skills at different levels e.g. level 1 communication and level 2 application of number. It would be helpful if the terminology used could be consistent, either ‘basic skills’ (i.e. literacy and numeracy) or ‘key skills’ (i.e. communication and application of number).

Q16 Should entry requirements set down nationally be based purely on educational qualifications?

Summary Response: No

32 Entry requirements should not be exclusively set out in terms of educational requirements. It would be helpful to recognise alternatives, which could be vocational skills achieved and recorded in a student's record of achievement.

Q17 Should entry requirements be set by employers, NTOs – in frameworks, or by Government through the DfEE or through LSC or all these (and/other) organisations working in partnership?

Summary Response: DfEE

33 The Council would support the setting of entry requirements by one organisation, the DfEE, which should consult with all of the other agencies mentioned. This would ensure consistency of the entry requirements if they are agreed centrally.

Q18 If Government set minimum entry requirements of, for example, GCSEs both Math and English at A-C or key skills at level 2 for AMA – what would be the effect on recruitment?*

Summary Response: No summary response required

34 It is likely that this might reduce recruitment slightly by deterring those young people who have not achieved exactly the grades specified. It would be important to understand whether those young people would then be better suited to the FMA and would be likely to take up an apprenticeship at a different level, and whether that apprenticeship could subsequently be 'accelerated' if the young person showed particularly good progress after entry.

7 **Guaranteed Apprenticeships**

Q19 *What are the key issues and obstacles to be addressed in developing and delivering such a guarantee, and how might these be overcome?*

Summary Response: No summary response required

35 The main obstacles to delivering a guaranteed apprenticeship are likely to be employer placements and the availability of off-the-job provision in some sectors and some areas.

36 If the guarantee is to apply to all school leavers there will be certain groups such as those identified in paragraph 3.31 of *Learning to Succeed Post 16 Funding: Second Technical Consultation Paper* who may be hard to place. This includes young people with special training needs.

37 Certain sectors will attract more applicants than others. It would be helpful to understand whether the guarantee will provide a choice of sector or subject. If it does not, then retention and completion rates may be adversely affected. If it does, it is likely that demand in some sectors may outstrip supply.

38 One option would be to link the guarantee to performance / attendance / subject options in the later years of school by the creation of learning compacts such as already exist between some employers or training providers.

Q20 *Should a guaranteed place be linked to a guaranteed employment opportunity for the duration of training?*

Summary Response: Yes

39 For the Apprenticeship Diploma to gain credibility with employers and the public it is essential that all young people gaining a Diploma can demonstrate work experience. In this way, a guaranteed place should provide a guaranteed employment opportunity for the duration of the training.

Q21 *What happens to young people who are not capable of achieving Foundation Modern Apprenticeships?*

Summary Response: No summary response required

40 Training providers already offer a wide range of programmes aimed at young people who are not yet ready to take up the option of employment. These programmes could lead into Foundation Modern Apprenticeships by establishing learning compacts in line with those outlined in Question 19.

41 The Council is concerned that there is little specific recognition of the needs of young people with learning difficulties and/or disabilities throughout the consultation document. Many young people who have disabilities such as visual or hearing impairment or mobility difficulties could benefit greatly from a Modern Apprenticeship if minor adjustments were made for them. Suitable training would significantly enhance their employability. The participation of these young people

should not necessarily mean the lowering of standards as they have much to contribute economically.

Q22 Should non-specific FMA, that is one not produced by an NTO or specific to a sector, be available in industry where no FMA framework currently exists?

Summary Response: No

42 A range of qualifications designed to offer non-sector specific education and training already exist. The offer of a non-specific FMA would simply add further choice to the range of qualifications on offer without providing a unique learning opportunity. This may be confusing and has the potential of being perceived 'second class'.

8 Better Independent Monitoring

Q23 Who should be involved in the independent monitoring of Modern Apprenticeships?

Summary Response: the Adult Learning Inspectorate

43 The Adult Learning Inspectorate (ALI) should undertake the independent monitoring of the quality of the learning programmes associated with Modern Apprenticeships. They will have the staff who understand the requirements of the MA, the expertise to judge the quality of programmes delivered by providers, a national perspective to ensure that the quality of training is consistent across the country, and will be independent. However it should be appreciated that some elements of MAs are delivered in colleges and usually to students aged 16 to 18. In these circumstances OFSTED would normally be expected to assess the quality of provision but, as explained above, for Modern Apprenticeships the ALI should undertake assessment. The NTOs will have a role in ensuring that the apprenticeships for their sector match their requirements in structure, provision of training, and in numbers under training. They may also have a role in approving centres to undertake training although this will probably be in conjunction with the examining bodies and the local LSCs. This role might be strengthened in cases where local providers provide a national or regional training base that goes across local LSCs.

Q24 How can this be used to improve performance and improve the equality of the experience for individual?

Summary Response: No summary response required.

44 There should be a process of regular and systematic dissemination of the findings from the quality monitoring work of the ALI and other monitoring work undertaken by the NTOs and the local LSCs. At the end of each ALI inspection the training provider should be given a thorough de-briefing on the quality of their training including areas for improvement. Targets should be set for action on the areas of improvement. Regular monitoring visits i.e. at least annually should be undertaken by the local LSC and/or the relevant NTO. These should include reviewing the areas identified for improvement by the ALI. Wider dissemination of monitoring information could be achieved by the production of reports on individual

providers, reports on particular themes, and either sector specific or common themes across sectors. Conferences and practitioner seminars could be held dependent on the level of material being disaggregated. Material presented at conferences could also be made available over the Internet. It will be important to ensure that such quality improvement information reaches down to practitioner level. Some form of kitemarking could be introduced for providers who are judged to be providers of good quality apprenticeships.

Q25 Should there be a forum for young people to give opinions on the quality of their training?

Summary response: Yes.

45 The Council would support this activity as best practice. Individual trainers should be encouraged or required to obtain feedback from trainees on the quality of their training. For example, most further education colleges have a regular cycle of obtaining student feedback on the quality of their education and training programmes. Such surveys are usually comprehensive and an integral part of the college quality systems. Surveys are typically undertaken at least twice per year. The first survey normally concentrates on the quality of the induction processes. The second survey normally concentrates on the quality of training, the support provided for the trainee, and the quality of the training resources. This type of procedure could be readily extended to other training providers as a condition of funding. Some form of annual overview report of trainee comments should be made available by each trainer. This could include a summary of the actions taken in response to the issues identified in previous surveys.

Q26 In the longer term, would centralised Internet-based tracking of the progress of apprentices be worthwhile, (as happens in Eire)? Who should be responsible?

Summary response: The costs should be evaluated against the benefits accruing

46 Whilst the Council supports advances in modern technology, in this case it suggests that the costs be carefully evaluated to show the advantages of Internet-based tracking of progress. The main requirement should be that every provider should have a comprehensive tracking system for each trainee and that records are kept up-to-date. Whether this system is electronically based or card/file based does not matter as long as it operates effectively. If an Internet based system was introduced, it would be important to ensure access to external organisations such as the LSC and to link recording into the new Individual Learner Record

9 Better Support

Q27 Who should provide support for a) trainees, b) employers, c) training providers?

Summary Response: No summary response required.

47 a) the support for individual trainees on a daily basis should come from the training providers and their trainers. If a company other than the training provider employs trainees then the employing company should ensure the training provider supports the employing company's trainees to the company's standards. To help provide consistency within and across training provider's common materials, such as an introduction to a trade or to the structure of an apprenticeship, should be developed by NTOs, the LSC and professional support bodies such as the Connexions Service and FEDA.

48 b &c) NTOs and the local LCSs.

Q28 What should this support consist of?

Summary Response: No summary response required

49 Support should consist of initial assessment, mentoring and support in training and a regular review of progress. Initial assessment should include the identification of any need for extra numeracy and literacy support. There should be processes to ensure that not only is the need for support identified but that the offer of support and its take up is followed through. Initial assessment, allied to mentoring and support in training, should aim to ensure that a trainee is clear about what is expected of them in terms of their technical and personal development. This should include health and safety requirements relating to their trade and personal qualities such as timekeeping. It might also include developing some of the broader key skills such as working with others. Progress should be reviewed regularly against a clearly identified training programme. Targets should be agreed and progress in achieving them monitored. NTOs and local LSCs could provide appropriate supporting paperwork or computer based material to aid this process. The overall aim of the support mechanisms should be to ensure that the trainee is making satisfactory progress on the right training programme and that they will be sufficiently motivated to complete their programme successfully.

Q29 What is the role of Government in providing support for those involved in the training process?

Summary Response: No summary response required

50 The government should ensure that sufficient funding is made available to support the Modern Apprenticeships and that a condition of funding the trainer is that they will provide high quality training. The government should ensure that it is seen as supportive of Modern Apprenticeships, for example, by promoting and publicising good practice and best practice as widely as possible. The government could ensure through the LSC that all the agencies involved in planning and supporting Modern Apprenticeships work effectively together e.g. ES, SBS, employer organisations and others.

Q30 How can competence within staff managing and delivering training (on and off the job) be improved?

Summary Response: No summary response required

51 Staff managing and delivering training should be required to obtain suitable qualifications which show that they are technically qualified within their trade, such as an NVQ, and which show that they can manage and deliver a training programme. Recent initiatives aimed at improving management and delivery of training, for example the Training and Development Lead Body (TDLB) awards, have centred on the assessment and verification process rather than the interpersonal skills required to motivate young people to achieve. A balance needs to be struck between the ability to deliver learning in both off-the-job and on-the-job situations and the recording of assessments. Local LSCs will be well placed to organise development activities in response to identified needs.

52 There should be a process of regular and systematic dissemination of the findings from the monitoring work of the ALI, the NTOs and the local LSCs relating to trainee support. To support trainers at a local level, practitioner seminars could focus on specific issues or themes.

Q31 What is the role of NTOs in providing support for the training process and the partners in it?

Summary Response: No summary response required

53 NTOs should provide the framework for the training processes in their sector. They should undertake the design, development and training in the use of user friendly documentation to simplify assessment and recording and free up trainers to carry out the training process. Regular dissemination via printed reports, CD-ROMs and Internet sites would ensure that training providers have access to current information and best practice. Routine monitoring of training providers and the training process should be the responsibility of the local LSC with the support of the NTO.

Q32 Should mentors be mandatory for all Modern Apprentices?

Summary Response: Yes.

54 Whilst the Council would support the idea of 'mentoring', it notes that this could be interpreted in two ways. Every apprentice should have someone who is responsible for overseeing their training and for monitoring their progress. If the trainer is also their employer this implies a mentoring/training support role. However, there will be cases where the employer is not the direct trainer of the apprentice. In these cases, the apprentice should have someone who oversees their training on a daily basis, i.e. a training support role, and someone from 'their' company who is suitably qualified and experienced to monitor their training and provide encouragement and a company perspective on their training, i.e. a mentoring role.

Q33 Should there be a national complaints procedure for Apprentices?

Summary Response: Yes

55 Each provider should have their own complaints procedure in the first instance. There may then be a need for those not satisfied by this to have redress

through a national system. This could be similar to that operated by the Council, including reference to an ombudsman.

Q34 *Should there be a common and stronger training agreement produced by DfEE for all apprentices?*

Summary Response: Yes

A common and stronger training agreement would be a helpful step forward. A stronger training agreement might remind the employer, and the trainee, of their commitment and responsibility to complete the training. It may also help to have improved induction arrangements to ensure that the trainee is committed to their programme.

10 Employers

Q35 *What are the main barriers for employers considering participation in Modern Apprenticeships?*

Summary Response: No summary response required.

56 There are a number of barriers to participation which include:

- the cost of committing significant human and physical resource to the training of apprentices who may subsequently choose to move to another employer (who may not be involved in training)
- the bureaucracy perceived by some to be significant which surround the registration and monitoring of Apprentices
- the difficulty in identifying suitable young people who will benefit from an opportunity
- the difficulty in predicting human resource needs three or four years in advance
- the ability of the company/employer to provide learning experiences across the whole range required by the qualification
- the ability of the company/employer to provide employment opportunities on completion of the apprenticeship.

Q36 *How have TECs and Awarding Bodies been able to help small enterprises in making MA work?*

Summary Response: No summary response required.

57 The Council considers that TECs, awarding bodies and employers are best placed to comment on current experiences of Modern Apprentices.

Q37 *What type of support should the Small Business Service make available specifically to SMEs seeking to take on a Modern Apprentice?*

Summary Response: No summary response required.

58 The Small Business Service could make available several types of support, for example:

- advice and guidance on the Modern Apprenticeship, its implication for the company in terms of workload and financial arrangements
- assistance in the recruitment and selection of young people
- a brokering service for companies who wish to share functions such as approved training officers (but not the provision of these services directly)
- a dedicated contact for liaison
- an undertaking that in the event of the company, despite its best efforts, being unable to fulfil its commitment complete the apprenticeship, another suitable placement will be found
- facilitation of networking opportunities for apprentices based in different SMEs such as an Apprentice Association
- a simple, easy to operate system of monitoring apprentice attendance and progress
- training and development and networking opportunities for those involved in the training and support of Modern Apprentices.

11 Financial Incentives For Employers And Awards For Trainees

Q38 What measures would better incentivise completion and achievements?

Summary Response: No summary response required.

59 The best incentive for young people and employers is the availability of suitable employment at the completion of the apprenticeship. Wherever possible employers should be encouraged to take on numbers of apprentices that can be offered employment on completion. Incentives for employers should be such that they are encouraged to take on realistic numbers.

60 The contribution of the employer to the cost of the apprenticeship should be clearly recognised.

61 Where employment on completion is not possible the award of a valued and transferable qualification recognised by industry and commerce may provide motivation. In terms of marking milestones, it may be helpful for the trainee to have gained 'credits' towards their goal or towards a particular qualification, as recognition of partial achievement. Financial incentives such as discount cards or personal incentives e.g. record tokens may work, if a sponsorship deal could be arranged. This could be linked to the suggestion about new technologies and providing mobile telephones.

12 Approval or Accreditation Of Employers Who Want To Employ MAs

Q39 Should the long-term aspiration be that all employers involved in Modern Apprenticeships be approved to do so?

Summary Response: Yes

62 Ideally all providers should be approved or 'accredited' to provide Modern Apprenticeships based on their existing ability to provide agreed levels of training and support and a proven commitment to continuous improvement. Any system of approval should not place unnecessary barriers in the way of prospective MA providers. Rather it should recognise existing strengths and a commitment to improve areas of weakness.

63 In other European countries being an employer providing high quality training is seen to add to the prestige of the company. Such companies often train more apprentices than they needed to help other employers in the local economy. This also contributed to their prestige. Consideration could be given to adopting such a model in England.

Q40 *Who would draw up the approval criteria?*

Summary Response: NTO National Council

64 Approval criteria should be consistent across the country and across sectors. This would require national approval criteria that are acceptable to employers, training providers and awarding bodies. The NTO National Council is well placed to bring together these parties to draw up the required approval criteria. They should consult with others, including representatives from NTOs, the local and national LSCs, and the ALI. Depending upon the training requirements for each NTO further criteria might be added to a common national framework by individual NTOs to cover features such as the technical requirements for training in the sector and other relevant issues such as health and safety.

Q41 *How should the system be implemented, in particular who should monitor its progress, NTOs, the Inspectorate or the LSCs?*

Summary Response: No summary response required.

65 If the principle of national and cross sector consistency outlined in Question 40 is accepted it follows that monitoring of progress should be undertaken by a body with national and cross sector oversight. The LSC, with its national focus supported by local presence, would be well placed to implement such an approval system. The NTOs and the LSC/local LSCs could monitor the initial approval of training providers. The approval of individual trainers would be the responsibility of the local LSC working in conjunction with the relevant NTO. The operation of this process would be overseen by the LSC, which may wish to seek the advice of the ALI on the matter of consistency in content and standards between different sectors.

Q42 *Should approval or accreditation extend to training provision through training providers also?*

Summary Response: Yes

66 If approval of employers is considered beneficial it necessarily follows that provision of the off-the-job elements of the apprenticeship should be subject to an

approval process. It is likely that the providers of training for Modern Apprenticeships will already be subject to quality inspection via the inspectorate and that the training provided for apprentices will also be inspected. This would allow inspectors to review the providers and the provision against the agreed criteria and advise on the appropriateness of accreditation accordingly.

Q43 *Overall, do the proposed reforms meet your perception of the need for change? Do they go too far or not far enough?*

Summary Response: No summary response required.

67 The Council welcomes the opportunity to comment on the proposed reforms of Modern Apprenticeships. In particular, it welcomes the coherence that will be brought to a system under one umbrella title, achieved by realigning National Traineeships into the Modern Apprenticeship system. Whilst the Council is supportive of the renewed rigour the reforms will bring, it will be helpful to have room for some flexibility, so as to encourage those young people who are currently only just on the margins and who with a little help in initial assessment could meet the eligibility requirements for Foundation. These young people may benefit particularly from the proposal for mentoring. Included in that group of young people are those with learning difficulties and/or disabilities who may require some adjustments to their surroundings to enable them to participate but who could benefit greatly from this vocational route. Many of these young people have already experienced vocational training, particularly at NVQ level 1 and in health and safety and lifeskills.

68 The support of employers and young people will be key to the success of the reforms. This will depend in part on the way in which the repackaged programmes are marketed and promoted. It will therefore be important to develop the understanding of advisers to young people so that they may feel confident about recommending this route to training and employment.