

Sub-Committee on Education, Skills and the Economy

Apprenticeships Inquiry

Submission

1 Our Experience of Apprenticeships

1.1 NOCN is a UK Awarding Organisation (AO) regulated by Ofqual and the other UK Qualifications Regulators. In addition, we are currently one of a small number of bodies who are also approved by the Skills Funding Agency to be an Apprentice Assessment Organisation (AAO) for the new reformed apprenticeships in England (formerly known as 'Trailblazers').

1.2 We are a charity that delivers apprenticeships, vocational qualifications and educational programmes that has been in existence for nearly 30 years. In the last seven years we have been delivering apprenticeships in a number of sectors. These are delivered to the current Specification of Apprenticeship Standards for England (SASE). In early 2013 NOCN supported, as the Awarding Organisation (AO), one of the employer led 'Richard Review' apprenticeship pilots under the UKCES' EOS initiative. This new apprenticeship took six months to develop. We are currently working with 49 employer groups on reformed apprenticeship standards and assessment plans.

1.3 Several of our charity's trustees are employers or from employer bodies. They employ apprentices, as does NOCN, and three of them sit as employers in various reform groups. Senior personnel from NOCN have an industry background and some have been apprentices in their early careers. In preparing our submission, we draw upon this combined experience of apprenticeships.

2 Summary of NOCN's View

2.1 The objective of the Government's laudable policy is to improve the quality of apprenticeships by fundamental reforms so that as a result, skills and productivity within the economy will increase. We completely support this policy and the key reforms including improved apprenticeship standards, end-point assessments (EPA) and encouraging employers to invest in apprenticeships by the introduction of the Levy on 1 April 2017.

2.2 NOCN believes that some excellent work has been carried out by the employer groups resulting in reformed apprenticeship standards and assessment plans which will drive up quality and potentially productivity.

2.3 However there are a number of major concerns in the way the reforms and their implementation have been managed, which we consider to be holding back progress and could potentially result in the policy not meeting its objective.

2.4 The major risks that appear to be facing the apprenticeship reform programme in achieving three million 'high quality' apprenticeships are:

- a) Lack of a coherent detailed design for the 'new world' of reformed apprenticeships, underpinned by a detailed implementation programme. We still do not have an accurate list of apprenticeship standards needed across the economy;
- b) Insufficient progress. At the current rate of progress, it could take several decades to completely reform all the apprenticeship standards, if we retain the present approach. It should be noted that as a result of constant changing advice from the Government many 'Trailblazers' have been in development for nearly two years and are still not complete. Annex A shows the progress position from the Government's website and documents in respect of the Phase 1 Trailblazers (announced in October 2013) and the Phase 2 Trailblazers (announced by the Prime Minister in March 2014);
- c) Scale of increased and complex administrative burden which appears to be designed into the new arrangements by the Government. This could result in employers, particularly SMEs, deciding not to engage with the reformed apprenticeships or apprenticeships at all. On some 'Trailblazer' groups employers are already drifting away and privately saying 'it's in the too hard box';
- d) Potential reduction in the numbers of adults undertaking apprenticeships. It should be noted that 40% of apprentices over the last five years have been over 25 years of age;
- e) Potential reduction in the number of SMEs undertaking apprenticeships. It should be noted that around 80% of the 2.4 million apprenticeship starts in the last 5 years were delivered by companies employing less than 200 people (many of these are SMEs);
- f) Inconsistencies in approach between various apprenticeship standards and the assessment plans, e.g. some have grading and/or qualifications and some do not, as well as apparent duplications and overlaps in the apprenticeship standards being developed by different industry groups;
- g) Omission from the design of a 'skills and training plan' which sets out clearly how skills will be developed in the work-place, the role of work-place learning, mentoring and the type of formal training;
- h) Governance structures are not yet in place and fully operational. The Institute for Apprenticeships (IfA) and the Digital Apprenticeship Service (DAS), have only recently been tabled and it will be a considerable challenge to get these fully operational. Whilst noting the publication of the Enterprise Bill at the end of February 2016 there are still a significant number of areas where clarity or

transparency is needed on the full extent of the roles for the two new organisations; and

- i) Inadequate communication to the types of organisations that are key to a successful implementation of the reforms, i.e. the several hundred thousand employers, including SMEs, training providers, AAOs/AOs, potential apprentices, parents and other stakeholders.

2.5 With regard to the later point, about communications and positioning of apprenticeships, the Government needs to understand that success will depend upon the commitment and engagement of a wide range of stakeholders, as well as employers. It needs to work to get this wider commitment and contribution.

2.6 The Government also needs to appreciate that for some young people neither an apprenticeship nor a university course is the right way forward. For them training or on-the-job experience may be a better route.

2.7 We assume the Sub-Committee will obtain (from the SFA) the numbers of apprenticeship starts for each of the 'Trailblazer' apprenticeship standards 'ready for delivery' in the current academic year starting in 1 September 2015 and how many of these are on apprenticeships where the AAO has been appointed. This will allow the Sub-Committee to see the statistical evidence of progress against an average annual target of 600,000 apprentices. This evidence we believe will demonstrate to the Sub-Committee that much more needs to be done and that there needs to be a major shift in gear to dramatically increase production of completely finished and implementable reformed apprenticeships. We need to be able to speed up the process so that typically development of a standard with its assessment plan takes around six months and does not extend over years.

2.8 We believe that the formation of the Institute for Apprenticeships (IfA) needs to be used as the mechanism for resolving the issues set out above. This would enable proper governance to be put in place and the approach revised so that the production of high quality apprenticeship standards and assessments can be increased as well as speeded up. In our view, to achieve the objectives of the policy, it is essential that the IfA is led and staffed by people who have worked in industry and have practical and operational experience of apprenticeships in the industrial setting.

2.9 It is inevitable, due to the time taken for any new Governmental organisation to be setup, that progress on reforming apprenticeship standards will be delayed. The introduction of the Levy will therefore have to be predominantly based upon the existing SASE apprenticeships. We believe that the extension of SASE apprenticeships would be preferable to a too rapid approval of draft apprenticeship standards and assessment plans which potentially affects the eventual quality.

3 NOCN's Detailed Submission

3.1 The Sub-Committee's inquiry has identified a number of areas of investigation:

- a) The target of three million apprentices by 2020, how the Government proposes to achieve this and how this may affect the 'skills gap';
- b) The proposal for an apprenticeships Levy and how this may be implemented;
- c) The institutional architecture of current provision and how this may be affected by the proposed Institute for Apprenticeships (IfA);
- d) Take-up of apprenticeships amongst 16–19 year olds and steps that can be taken to make more young people aware of available opportunities;
- e) The process of applying for apprenticeships;
- f) Routes for progression to higher qualifications for current apprentices;
- g) The quality of, and minimum standards for, apprenticeships and how standards can be enforced; and
- h) Lessons from other countries' approaches to apprenticeships.

3.2 We consider each of these in turn. In addition we have added comments on the 'Devolved Administrations' and 'Proposals for a way forward'.

The target of three million apprentices by 2020, how the Government proposes to achieve this and how this may affect the 'skills gap'

3.3 NOCN believes that some excellent work has been carried out by the employer groups resulting in reformed apprenticeships which will drive up quality and potentially productivity. We also believe that the UK's existing apprenticeship system, with its supporting feeder and embedded qualification regime, does need reform. However not all existing apprenticeships need radical reform. Some could be readily up-graded and modernised. Having a target such as three million apprenticeships is desirable as it gives a focus to what we as a nation are trying to achieve.

3.4 Over the last five years, ending in 2014/15, the number of apprenticeship starts has been reported to Parliament as 2.4 million¹. These are all on the existing SASE apprenticeship frameworks which the Government considers are inadequate and need to be improved. It should also be noted that around 80% of these are

¹ House of Commons Library, Briefing Paper Number 06113, 5 January 2015, "Apprenticeship Statistics: England (1996-2015)" by Jeanne Delebarre

delivered by companies employing fewer than 200 people (many of these are SMEs) and just over one million were adult apprentices over 25 years old.

3.5 Bearing in mind that these SASE apprenticeship starts, exclude degree apprenticeships, as well as apprenticeships in sectors that do not have that tradition, one can see why the Government might consider the target of three million as achievable. However we question that it is realistic and also the proportion of these that will be to the new reformed apprenticeship standards (formerly 'Trailblazers').

3.6 It is not clear in sufficient detail how the Government intends to achieve this target and also improve quality, with its resulting increase in productivity. There is currently no apparent detailed design for the 'new world' arrangement, nor a supporting detailed implementation plan. Neither is there a clear view of the number of apprenticeship standards needed across the economy. If the Government does have such a detailed design, implementation plan and full list of standards it is not effectively communicating these.

3.7 We know that the Government is undertaking reform work such as writing new apprenticeship standards through the 'Trailblazer' process, appointing, after a selection exercise, Apprentice Assessment Organisations (AAOs) and introducing the Levy. They are also planning to retain the existing SASE apprenticeship frameworks as a transitional arrangement until 2019 when it is presumably hoped that all the new reformed apprenticeship standards and assessment plans are in place.

3.8 Optimistically the Government might achieve the three million target headline figure if it:

- a) Retains the existing SASE apprenticeships until at least 2020, if not beyond, i.e. accepts there will be a very limited improvement in quality or productivity in this Parliament. We will explain this in more detail when we examine the rate of progress to date. The Government should fully appreciate that the SASE apprenticeships are going to be needed for much longer than is currently being planned;
- b) Supports the training providers to make the change to apprenticeship delivery. We note recent positive announcements to this effect;
- c) Expands apprenticeships within the public sector. We welcome the provisions in the Enterprise Bill for apprenticeship targets in the public sector;
- d) Encourages sectors which have not traditionally used apprenticeships to adopt them. Making the system very streamlined and simple will be essential if this is to happen; and
- e) Reclassifies professional career routes as 'Degree Apprenticeships'. There could be some interesting cultural resistance to this.

3.9 However there are major risks to achieving the target and delivering quality apprenticeships which will increase productivity:

- a) Insufficient newly reformed apprenticeship standards will be fully ready for delivery (with an AAO appointed) resulting in only a small proportion of the apprenticeship starts being on the 'higher quality' apprenticeships;
- b) Any increased and complex administrative burden will cause employers, particularly SMEs to reduce their involvement in apprentices. In this respect it should be noted that the SFA guidance for apprenticeship funding for the academic year 2016/17 runs to some 146 pages;
- c) The deliverability of the new online portal being urgently developed by the Government for March 2017 in order to support the introduction of the Levy. It is understood that this could place new administrative burdens on employers and could add to an impetus to disengage with apprenticeships;
- d) The uncertainty over funding for SME apprenticeships further impacting their confidence in the reformed system;
- e) Some Levy payers may find that it is easier just to pay the Levy as a tax and avoid the additional administrative burden of apprenticeships;
- f) Loans for adult apprenticeships might impact the numbers of adult apprentices (one million from 2010-2015);
- g) The wider funding regime changes, including devolvement to local commissioners, which is also happening over the next two years could distract people's focus;
- h) The restructuring of the FE sector through the area review process is happening at the same time, linked to changes in sub-contracting arrangements. People's focus will be on structural issues, not providing new capacity to deliver the three million apprenticeships;
- i) The provision of training and assessment services is being subject to an EU Procurement Procedure over the next 18 months; and
- j) Uncertainty and the lack of a robust operational system which has been fully explained to employers, training providers and AAOs, could cause people to hold back.

3.10 If the expectation is that all these three million apprenticeships will be on the new reformed 'high quality' apprenticeship standards, coming from the 'Trailblazer' process, then this is not going to be achieved.

3.11 Our reason for stating this is based on an analysis of progress to date.

3.12 In order to understand how well the policy is being implemented we need to have some understanding of how many apprenticeship standards will be needed across the economy. If we look at countries in northern Europe such as Germany and other advanced economies we can see that they have around 340-600 standards similar to those we are calling apprenticeship standards. However these are mainly for what we would call in the UK the traditional craft roles and also provide a broader entry route to a sector. They do not extend to all areas where there has been no tradition of apprenticeship nor do they cover degree apprenticeships. As our approach is to be more specific and granular about the job role and to aim to cover all the economy, we would therefore expect the number of the apprenticeship standards in the UK to be higher than in northern Europe and other advanced economies.

3.13 At present the number of job roles covered by the 334 SASE frameworks is just under 1,700. This does not include degree apprenticeships or apprenticeships in sectors without this tradition. A comparison of job roles in the SASE frameworks and the new list of 'Trailblazer' apprenticeship titles indicates that there are similarities. However some of the more general job roles in the SASE appear to be split into several job titles in the 'Trailblazers' and there are now duplications² of job roles in different sectors. Using the construction sector, as an example there are currently 88 job roles (apprenticeship standards) in the existing SASE arrangements. The 'Trailblazer' process, which is only partially complete in this area, has produced new standards which were not there before. As a result it appears to have increased the total number to around 100, at least. We therefore believe that the net result of the current approach is that the eventual number of apprenticeship standards is more likely to grow than reduce.

3.14 An estimate of the total number of reformed apprenticeship standards which might be needed across the economy could be 2,000 to 2,500, including degree apprenticeships. We point out that this is based upon the Government's present approach. This does not mean we think this number of apprenticeship standards is desirable. In fact alternative approaches based upon a more broadly based apprenticeship followed by training to develop further levels of specialism could result in a much reduced number of apprenticeship standards.

3.15 In assessing progress we must base this on the Government's approach rather than any alternative. Accordingly, as the Government has not to date published a firm figure of the number of apprenticeship standards it is planning to produce, we take the above as the reasonable estimate.

3.16 Phase 1 of 'Trailblazers' was formally announced in October 2013, some two and half years ago. Then in March 2014 the Prime Minister announced Phase 2.

3.17 On 5 October 2015 the Government published a list of apprenticeship standards in development, approved and ready for delivery. At this stage there were

² e.g. Business Improvement Technician in 'Business Improvement' Sector is the same type of role as Continuous Improvement Technician in 'Food & Drink' sector.

344. However at present the SFA register shows that this number has declined to 213 apprenticeship standards [GOV.UK website end of February 2016] being worked on or developed (i.e. 8.5% to 10.6% of the potential total required). Of these 213 apprenticeship standards the SFA reports 76 (i.e. 3.04% to 3.8% of the above estimate) as ready for delivery. However the SFA's RoAAOs published at the end of February 2016 shows that only 23 of these have so far got an Apprentice Assessment Organisation (AAO) appointed i.e. are truly fully ready for delivery. Annex B sets out the list of 23 apprenticeship standards where the Government has appointed an AAO and from this we can see that some of the larger employing sectors of the economy do not have any fully completed standards. We appreciate that the actual numbers are varying constantly, but they do give us an order of magnitude for comparison.

3.18 Clearly at this rate, if something is not done to radically improve production of the complete apprenticeship standards and assessment plans, then it could take several decades to reform all the apprenticeships. Arguably they might never be finished, as within five years many would need to change to reflect new technology and working practices.

3.19 As well as increasing the rate of production we believe we need to speed up the development elapse time. If we review progress on the Phase 1 and 2 Trailblazers, see Annex A, announced in October 2013 and March 2014 respectively, we see that of the 93 standards only 42 of these are now 'ready for delivery' and only 17 (5 in Phase 1 and 12 Phase 2) have AAOs appointed. The Enterprise Bill now, in effect, re-defines 'ready for delivery' to be when an AAO (independent third party) has been appointed, so it is this measure we need to focus on. In considering this analysis it must be noted that since the various announcements the actual numbers and titles of apprenticeship standards have been revised. Notwithstanding this the analysis does give an indicator of progress.

3.20 Whilst expressing our concern over progress to date, we think the Government should avoid accelerating the approval of draft apprenticeship standards and assessment plans in order to increase the number ready for delivery as this could have a negative impact on quality. Instead the process for developing apprenticeship standards and assessment plans needs to change in order for the rate of completions to substantially increase and the time taken to complete the development to reduce.

3.21 The only conclusion anyone can take from a review of progress so far is that only a small proportion of the apprenticeship starts in this Parliament will be on the new 'high quality' reformed apprenticeship standards. The existing SASE apprenticeship frameworks will need to be in place for some time to come and we will need to 'un-freeze' them.

3.22 The current 'product' of a reformed apprenticeship consists of an apprenticeship standard and an assessment plan. In general the template for these appears to be working and the employers are producing some excellent standards

and assessment plans. However there is, in our view, a major omission which could have a significant impact on being able to control the quality of apprenticeships. The omission is that there is no 'skills and training plan' which sets out clearly how skills will be developed in the work-place, the role of work-place learning, mentoring and the type of formal training.

3.23 Ideally the 'Trailblazer' initiative should have ended with Phase 2; the learning consolidated and a detailed design for the new approach with supporting implementation plan then prepared. This does not appear to have happened in a transparent way which would then build confidence from a wide range of employers, training providers, AAOs/AOs, apprentices, parents and other stakeholders.

The proposal for an apprenticeships Levy and how this may be implemented

3.24 We support the principle of the Levy and the fact that implementation is happening with the larger employers rather than trying to implement across some one million employers all at once. Some employers are taking a view that the Government at some stage will increase the percentage of payroll costs to be paid and lower the payroll costs floor. The later change would bring in more SMEs.

3.25 In our experience, employers who are going to pay the Levy from next year are adopting a range of different positions. At one end of a spectrum they are likely to aim to spend all the value in their digital account, plus something additional. In this case they will react in a way which the Government might wish. However some employers, whose salary bill is only a very small proportion of their total cost base, may decide that it is easier to just pay the Levy as an extra tax and not take on reformed apprenticeships due to the administrative burden.

3.26 We think that there are some major risks associated with the implementation not least of which is the speed of introduction of the new online portal, with little time for consultation, testing, training and communication.

3.27 Developing and implementing the portal in this way might result in business processes being incorporated which employers and others find expensive to operate. An extra administrative burden could be very negative for SMEs who will not be paying the Levy currently. In this respect the position for SMEs is still unclear, with different messages coming out of the Government. As a result the risk is that many SMEs will just say no to engaging apprenticeships; having a dramatic impact on apprenticeship starts.

The institutional architecture of current provision and how this may be affected by the proposed Institute for Apprenticeships

3.28 Much is happening. The following key institutions are disappearing in a very short timescale:

- a) Sector Skills Councils (SSCs), with their role on NOS and apprenticeships;

- b) FISSS, which currently manages the existing SASE apprenticeship frameworks and also apprenticeship certification; and
- c) UK Commission for Employment & Skills (UKCES), which has controlled the SSCs, NOS maintenance and development as well as the various annual skills surveys and statistics. This last function we understand is being transferred to BIS.

3.29 In their place are:

- a) **Digital Apprenticeship Service (DAS)**, which appears to be emerging as a part of the SFA. It is understood that it is likely to be responsible for the operational management of the Levy funding including the employer digital accounts, contracting and payment to training providers and AAOs. In addition it is being assumed by some that DAS will take over the operational management of the FISSS responsibilities for the issuing and dispatch of apprenticeship certificates; whilst the IfA will be responsible for the quality assurance of the certificates. It is thought it is also likely to manage the responsibilities for the apprenticeship recruitment and brokerage service (NAS); and
- b) **Institute for Apprenticeships (IfA)**, which is a new employer-led organisation which will take over responsibility from BIS and the SFA relationship management team for the development of apprenticeship standards and assessment plans as well as quality assurance for the reformed apprenticeships and evaluations. It will also be responsible for the control of certification and the appointment of independent third party assessment organisations i.e. the current Register of Apprentice Assessment Organisations (RoAAOs). In addition it will be responsible for maintaining a list of approved standards as well as reviewing and revising these as appropriate.

3.30 The Enterprise Bill sets out much of the detail, but not all. Future transitional arrangements for SASE and NOS are not fully defined and there is still much to be made clear on the function and structure of the IfA.

3.31 In the way the Bill sets out the remit for the IfA it could be envisaged that it would become in effect the 'regulator' for reformed apprenticeships, whilst the DAS would become the operational body. Should IfA evolve to being the 'regulator' then, in addition to developing apprenticeship standards and assessment plans, it could at some stage also undertake the following functions:

- a) Management of apprenticeship policy and oversight of the Levy;
- b) Management of the existing SASE apprenticeship frameworks in order to transition these to the new standards;
- c) Management of the NOS again in order to transition these to the new standards;

- d) Management and assurance of the Register of Training Organisations (RoTOs). The Bill give it responsibility over the RoAAOs;
- e) Management of external quality assurance functions, some of which might be delivered through sub-contract arrangements to third parties; and
- f) Quality assurance of any qualifications required for apprenticeships.

3.32 We would support a single ‘regulatory’ organisation for apprenticeships, which was properly constituted and resourced. In our view, to achieve the objectives of the policy, it is essential that the IfA is led and staffed by people who have worked in industry and have practical and operational experience of apprenticeships in an industrial setting.

3.33 In order to ensure that there is proper industry engagement we would expect that there would be various industry sector Sub-committees, perhaps around 15 in number, which would deal with the detailed work in each major sector.

3.34 We would return to the point we made earlier on the number of apprenticeship standards across the economy. Clearly the organisation will need to be able to develop, maintain and update, based upon the Government’s current approach, some 400 apprenticeship standards per year. This would be with all supporting documentation, such as assessment plans and evaluations, as well as operating all the quality assurance processes. The IfA will also need to have oversight and quality assurance responsibilities for some 600,000 apprenticeship starts per year.

Take-up of apprenticeships amongst 16–19 year olds and steps that can be taken to make more young people aware of available opportunities

3.35 There are sectors and types of job roles where it is possible to have an apprenticeship start at 16 and others that are not. This needs to be clear to all concerned, including those engaged in careers support.

3.36 Making young people and their parents aware of apprenticeships and the opportunities for young people requires a multi-channel blended approach such as:

- a) Careers support in educational establishments such as employment advisors in schools and colleges;
- b) Nationwide awareness raising exercise for parents and students;
- c) Online information portal through the proposed DAS/NAS services;
- d) National advertising;
- e) Social media;
- f) Industries engaging in educational establishments; and

g) Jobs and careers fairs.

3.37 We do not think that a single approach on its own will be effective.

3.38 The communication strategy sitting behind all the activity in the various channels will initially have to focus on the value of an apprenticeship choice as well as the specific type of opportunities available in certain sectors.

3.39 We think that it will take time to change the perspectives of the value of an apprenticeship compared to say just taking up a job or going to university i.e. parity of esteem. It could take a generation to see a major shift in attitudes.

3.40 In respect of delivery, an apprenticeship means that the person is employed by a company and both works and attends training. Accordingly we cannot see how Ofsted's view that all 16-19 years should be educated in schools can work for apprenticeships. Schools are not equipped to deliver apprenticeships.

The process of applying for apprenticeships

3.41 Inevitably different employers will have their own approaches to recruitment at a national and/or regional level. Some will recruit themselves, some will use recruitment agents, and others will use Government services such as NAS and/or JCP.

3.42 All of these processes need to be available. Notwithstanding this making a national online service available could at this stage help boost the interest in apprenticeships as a career choice rather than university.

Routes for progression to higher qualifications for current apprentices

3.43 To date the focus has been on writing apprenticeship standards as well as assessment plans, not always in the context of a complete view of core standard entry requirements nor career pathways within a sector. During the detailed design of the process we believe consideration needs to be given to this aspect. This could result in a reduced number of apprenticeship standards being needed.

The quality of, and minimum standards for, apprenticeships and how standards can be enforced

3.44 We understand that the Government's proposals is for the Institute for Apprenticeships to be the body which will be responsible for quality and minimum standards for reformed apprenticeships (formerly 'Trailblazers').

3.45 It will need to be resourced at an appropriate level in order to exercise quality assurance if the Government is to achieve its aim of increasing the standards of apprenticeships. Minimum standards would then need to be clearly defined in:

a) Apprenticeship standards;

- b) Assessment plans;
- c) Examinations, tests as well as detailed formative and end-point assessments; and
- d) Skills and training plans.

3.46 The details of the Government's proposals are still being developed, but we would suggest that they adopt a Total Quality Model (TQM) methodology which would mean control over all the documentation set out above as well as the functions mentioned earlier. This would include quality control over the independent third parties (AAOs) and training providers approved for apprenticeships.

3.47 If organisations do not conform to the national standard then appropriate corrective action would be necessary.

Lessons from other countries' approaches to apprenticeships

3.48 Some of the best approaches are in northern Europe (e.g. Denmark, Germany) as well as Commonwealth countries such as Australia. The UK's historic apprenticeships programme were comparable to these. However over the last three decades our apprenticeship system, has in our view, deteriorated.

3.49 We are aware that the Government has carried out a lot of research into the approaches in other countries and formulated its view on the best way forward in England. Our view is that we should not go back over all this research, but instead concentrate efforts on:

- a) Completing the detailed design for the reformed apprenticeship system, including components such as a 'skills and training plan';
- b) Increasing the rate of completions for apprenticeship standards and assessment plans as well as speeding up the development timescales;
- c) Streamline the business processes;
- d) Establishing proper governance and quality assurance systems and resources; and
- e) Fully engage employers, training providers, AAOs/AOs and other stakeholders in order to win their confidence and involvement.

3.50 With regard to the last point people are concerned that Trailblazers and reformed apprenticeships will suffer the same fate as modern apprenticeships and diplomas. The Government needs to quickly give people confidence that this is not the case.

Devolved Administrations

3.51 We appreciate the jurisdiction of the Sub-Committee in England. However we have major concerns, due to the way apprenticeship reform is working with the Devolved Administrations in Northern Ireland, Scotland and Wales, which we wish to raise with the Sub-Committee.

3.52 If we proceed down the path we are now set upon, we are very likely to create a situation where there is no standard for an apprentice across the whole of the UK. For UK employers or for employers who work across the borders of two of the Devolved Administrations this will cause an unnecessary administrative burden and a difficulty in operating company wide employment legislation.

3.53 UK-wide employers, who are generally the larger employers, will inevitably take a view that they want a single apprenticeship system across the whole of the UK. If, through the reforms and the introduction of the Levy, they commit to the new apprenticeship standards in England, they are likely to consider these as the default UK standard as will other employers outside the UK.

3.54 By way of example we consider the maintenance of German cars in the UK. The apprentice mechanic in Birmingham will have to perform to the same standard as required by the German manufacturer as will an apprentice in Belfast, Cardiff or Glasgow. In this example it is clear there needs to be a single standard not four different ones. The multiplicity of standards just adds to costs and bureaucracy.

3.55 It is understood that people living in Northern Ireland, Scotland and Wales will not be able to access the new high quality reformed apprenticeships available in England. This results in a major inequality of opportunity across the UK with potentially apprentices in the Devolved Administrations not having access to the high standard learning and career progression opportunities that apprentices from England will have.

3.56 In addition the fact that there is no UK wide recognised apprenticeship standards will further damage the parity of esteem that is trying to be achieved through increasing the profile and standards of apprenticeships.

Potential way forward

3.57 We support the principles and main thrust of the reforms. In the light of progress to date we feel that the Government needs to consider the following actions:

- a) Complete the detailed design of the new apprenticeship reforms and system. This includes establishing a firm understanding of how many apprenticeship standards are required and are desirable across the economy;
- b) Finalise and publish the details of a streamlined business process which can be operated by SMEs and others as well as the details of the new DAS portal;

- c) Establish a realistic and robust implementation plan, with all the support risks, issues and governance structures;
- d) Complete the detailed design of the functions and structure for the IfA and make these public. This should ensure that there is proper provision for discharging the potential additional functions of the IfA such as:
 - o Management of apprenticeship policy and oversight of the Levy,
 - o Management of the existing SASE apprenticeship frameworks in order to transition these to the new standards,
 - o Management of the NOS again in order to transition these to the new standards,
 - o Management and assurance of the Register of Training Organisations (RoTOs) in addition to the RoAAOs,
 - o Management of external quality assurance functions, some of which might be delivered through sub-contract arrangements, and
 - o Quality assurance of any qualifications required for apprenticeships;
- e) Resource the IfA to increase the production of apprenticeship standards and assessment plans as well as properly discharge all of its functions;
- f) Un-freeze the existing SASE apprenticeships in order to allow a staged transition to the new arrangement. In this respect it needs to be recognised that there will need to be an overlapping period when both the SASE and reformed apprenticeships are operating in order to protect individuals, that have already enrolled on a SASE apprenticeship;
- g) Use industry sub-committees in IfA to establish a definite list of apprenticeship standards that are required in each sector and undertake an analysis of cross-sector roles in order to reduce duplications. In doing this the sub-committees should consider the core skills for broad apprenticeships as an entry to sectors as well as a pathways approach to developing specialism. By doing this we believe that the number of apprenticeship standards eventually required could be reduced to a more manageable number;
- h) Compare the definite list with the SASE list and from this identify which standards could be produced by a 'fast-track' up-grade of certain existing apprenticeships;
- i) Prioritise development of reformed apprenticeship standards based upon potential apprenticeship numbers and relative ease of 'fast-tracking'; and
- j) Establish and implement a communication plan for possible apprenticeships, parent, schools, career advisers, employers, training providers, AAOs/AOs and other stakeholders.

Submitted on behalf of NOCN by

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Annex A: Progress on Trailblazers

Phase 1: October 2013 starts

Sector	Role	Level	Standard in development	Standard approved	Ready for delivery	AAO approved	
Aerospace	Aerospace Manufacturing Fitter	3		✓	✓		
	Aerospace Manufacturing Electrical and Mechanical Systems	3		✓	✓		
Automotive	Mechatronics Maintenance Technician	3		✓	✓		
	Control/Technical Support Engineer	6		✓	✓		
	Electrical/Electronic Technical Support Engineer	6		✓	✓		
	Manufacturing Engineer	6		✓	✓		
	Product Design and Development Engineer	6		✓	✓		
	Product Design and Development Technician	3		✓	✓		
Digital Industries	Network Engineer	4		✓		✓	
	Software Developer	4		✓		✓	
	Software Tester	4		✓			
	Digital Marketer	3		✓			
	Cyber Intrusion Analyst	4		✓			
	Data Analyst	4		✓			
	Infrastructure Technician	3		✓			
	Communications Trouble Shooter	4		✓			
Electrotechnical	Installation Electrician/Maintenance Electrician	3		✓	✓		
Energy and Utilities	Power Network Craftsperson	3		✓	✓	✓	
	Utilities Engineering Technician	3		✓	✓	✓	
	Water Processing Technician	3		✓	✓	✓	
Financial Services	Relationship Manager - Banking	6		✓	✓		
	Financial Services Administrator	3		✓	✓		
Food and Drink	Food and Drink Maintenance Engineer	3		✓	✓		
Life & Industrial Sciences	Science Manufacturing Technician	3		✓	✓		
	Laboratory Technician	3		✓	✓		
Totals					25	17	5
			Grand Total			25	

This includes standards which were added, revised or removed subsequent to the main announcement. AAO approvals are as at the end of February 2016.

It is recognised that the picture is constantly changing, but this gives an indication of progress.

Phase 2: March 2014 starts

Sector	Role	Level	Standard in development	Standard approved	Ready for delivery	AAO approved
1. Accountancy	Professional Accountant	7		✓		
	Professional Accountant Taxation Technician	4		✓		
	Assistant Accountant		✓			
2. Actuarial	Actuarial Technician	4		✓	✓	✓
3. Adult Social Care (Now Adult Care)	Leader in Adult Care	5		✓		
	Lead Practitioner in Adult Care	4		✓		
	Lead Adult Care Worker	3		✓		
	Adult Care Worker	2		✓		
4. Airworthiness	Aircraft Maintenance Fitter/Technician	3		✓		
5. Automotive Retail	Motor Vehicle Service and Maintenance Technician (Light Vehicle)	3		✓	✓	
6. Aviation	Airside Operator	2		✓		
7. Butchery	Butcher	2		✓	✓	✓
8. Cinema Industry - cancelled?						
9. Civil Service (Now Public Service)	Operational Delivery Officer			✓	✓	
10. Construction	Building Services Engineering Site Management	6		✓		
	Construction Quantity Surveyor	6		✓		
	Civil Engineering Site Management	6		✓		
	Construction Site Management	6		✓		
	Construction Design Management	6		✓		
	Construction Technician	4		✓		
	Highway Electrician / Service Operative	3		✓		
	Highways Maintenance Supervisor	3		✓		
	Advanced Carpentry and Joinery	3		✓		
	Highway Electrical Maintenance & Installation Oper	2		✓		
	Highways Maintenance Skilled Operative	2		✓		
	Assembly Technician	2		✓		
	Carpentry and Joinery	2		✓		
	Wheelwrighting	3	✓			
	Shop Fitting	2	✓			
	Shop Fitting	3	✓			
11. Conveyancing	Licensed Conveyancer	6		✓	✓	
	Conveyancing Technician	4		✓	✓	
12. Craft	Craftsperson	3		✓		
13. Dental Health	Dental Laboratory Technician	5		✓	✓	✓
	Dental Laboratory Assistant	3		✓	✓	✓
	Practice Management	4		✓	✓	✓
14. Early Years	Early Years Educator	3		✓		
15. Emerging Technologies (Now Life and	Science Industry Maintenance Technician	3		✓	✓	
16. Hair and Beauty	Beauty Professional	2		✓		
	Hair Professional	2		✓		
17. Horticulture (Now under Golf Greenk	Golf Greenkeeper	2		✓	✓	✓
18. Hospitality and Tourism (Now Hospit There are no specific Tourism Trailblazer under development at	Hospitality Manager	4		✓		
	Senior Chef Culinary Arts	4		✓		
	Senior Chef Production Cooking	3		✓		
	Chef de Partie	3		✓		
	Hospitality Supervisor	3		✓		
	Commis Chef	2		✓		
	Hospitality Team Member	2		✓		
19. Housing	Senior Housing/Property Management	4		✓	✓	✓
	Housing Property/Management	3		✓	✓	✓
	Housing Property/Management Assistant	2		✓	✓	✓
20. Insurance	Insurance Professional	4		✓	✓	
	Insurance Practitioner	3		✓	✓	
21. Land-based Engineering	Land-based Service Engineering Technician	3		✓	✓	
	Land-based Service Engineer	2		✓	✓	
22. Law	Solicitor	7		✓	✓	
	Paralegal	3		✓	✓	
	Chartered Legal Executive	6		✓	✓	
23. Maritime	Able Seafarer - Deck	2		✓	✓	
	Engine Room Rating		✓			
	Maritime Caterer		✓			
24. Media	Junior Journalist	3		✓	✓	✓
25. Nursing	Nurse		✓			
26. Property Services	Property Maintenance Operative	2		✓	✓	✓
27. Rail Design	Railway Engineering Design Technician	3		✓	✓	✓
28. Retail	Retail Manager	4		✓		
	Retail Team Leader	3		✓		
	Retailer	2		✓		
29. Travel	Travel Consultant	3		✓		
Totals			7	61	25	12
			Grand Total		68	

This includes standards which were added, revised or removed subsequent to the main announcement. AAO approvals are as at the end of February 2016.

It is recognised that the picture is constantly changing, but this gives an indication of progress.

Annex B: List of Apprenticeship Standards with an approved AAO

Standard	Level	Sector
Acturial Technician	4	Acturial
Butcher	2	Butchery
Systems Engineer Masters	7	Defence
Dental Laboratory Assistant	3	Dental Health
Dental Nurse	3	Dental Health
Dental Practice Manager	4	Dental Health
Dental Technician	5	Dental Health
Network Engineer	4	Digital Industries
Software Developer	4	Digital Industries
Dual Fuel Smart Meter Installer	2	Energy and Utilities
Gas Network Craftsperson	3	Energy and Utilities
Gas Network Team Leader	2	Energy and Utilities
Power Network Craftsperson	3	Energy and Utilities
Utilities Engineering Technician	3	Energy and Utilities
Water Process Technician	3	Energy and Utilities
Golf Greenkeeper	2	Golf Greenkeeping (Horticulture)
Housing/Property Management Assistant	2	Housing
Housing/Property Management	3	Housing
Senior Housing/Property Management	4	Housing
Junior Journalist	3	Media
Property Maintenance Operative	2	Property Services
Railway Engineering Design Technician	3	Rail Design
Refrigeration Air Conditioning & Heat Pump Engineering	3	Refrigeration Air Conditioning
Total number of standards with an AAO = 23 as at end Feb'16		

Position in respect of high employing sectors:

Sector	Position
1. Retail and wholesale	None
2. Health & social care	4 in dentistry, but none in the main employing roles
3. Education	None
4. Manufacturing	1 but none in the main employing roles
5. Scientific & technical	None
6. Admin & support services	None
7. Construction	None
8. Accommodation & food	2 but none in the main employing roles
9. Public admin and defence	1 in defence, but none in the main employing roles
10. Transport and storage	1 but none in the main employing roles

UK Government sectors ranked by employment size with 1. as largest [BIS Data]