

Northern Ireland Assembly - Sub-group on economic challenges

Terms of Reference - "To consider and report on the measures required to develop an integrated skills and education strategy capable of meeting the current and future needs of the economy and based upon best practice elsewhere."

A comment by the University and College Union (UCU).

175.06

1. UCU is disappointed we did not have the opportunity to appear before the Sub-group. That opportunity was not realised as developments at St.Andrews overtook events. We nonetheless welcome the invitation of the Committee to make a written submission and hope you will find our comments of value.

2, The subject under examination has been visited many times by many governmental organisations over the years. Indeed the Assembly in its examination of the further education sector has gathered important evidence which prompted government to take forward a major review of further education and to develop policy in respect of its role in meeting the skills agenda. Other important work in this area has been carried out by the former Training and Employment Agency, the Learning and Skills Advisory Body, the New Deal Task Force as well as the Skills Task Force.

3. UCU has no doubt that in its work the sub-group will have paid careful attention to past government policies and those currently under way. We are also of the view that, whilst much can be learned from examining practice in other economies, because of historical development which have set structures in a unique way in our society, only general pointers may be acquired, and that our needs are best met by understanding indigenous factors and shaping policies and proposals to meet our specific needs.

4. In 2004 the then Minister Barry Gardiner proposed a Skills Strategy for Northern Ireland which was followed by a Programme for Implementation issued by his successor Angela Smith MP. There is much in those proposals relating to aspirations and priorities for our society which have to be taken seriously and which if addressed, will greatly enhance the level of skills in the Northern Ireland workforce. We would urge the Committee not to lose sight of those proposals. Below we set out some of the areas where we believe a difference of approach is required.

5. The Minister proposed to establish "for the first time, an over-arching framework for the development of skills". NATFHE (as UCU was then) felt this was nothing new – the view that skills needs be articulated and that mechanisms be put in place to ensure that the skills needs of employers and individuals are matched by providers. Past efforts have had some success but overall strategies have not been successful due to the lack of central co-ordination and direction.

6. The Minister proposed that the Skills Task Force should develop a regional framework for employment and skills action through a number of workforce development forums. UCU does not believe that approach will be any more successful than what has gone before. It is our view that co-ordinated implementation of a strategy can only be achieved through a mechanism such as a Learning and Skills Council (which apply in England) with strategic and executive powers similar to those which apply to such bodies elsewhere in the UK.

7. Government has taken a step in that direction with its proposal to establish an Education and Skills Authority. This is welcome, however at present the proposed Authority is set squarely within the Department of Education with the post-school education and training sectors falling under the responsibility of the Department of Employment and Learning. If the concept of an Education and Skills Authority is to have relevance it must embrace all those interests and providers who contribute to the education and skills agenda . That would include the further education colleges and the universities as well as employers and training organisations. It is our view that our community would be better served by having a single government department which has authority in respect of all providers in the field.

The imminent changes within the 16-19 education requires a cohesive and co-ordinated approach linking mainstream post primary and post 16 providers to ensure vocational , academic and personal development enables individuals to reach their potential in the economy.

8. UCU is also of the view that the principle of voluntarism with regard to training and workforce development - which is explicit in current government policy - has proven not to be successful particularly in an economy dominated by small to medium sized enterprises (SMEs). The expectation held by many employers that training is an optional add-on to be entered into only when finance is available from the public purse must be overcome. We feel there is a case for a return to a system of training levy applied to all employers to fund training and workforce development as determined by Sector Skills Councils constituted upon a statutory basis for operation.

9. Government has stated "a central value of the strategy is that it is demand driven by the needs of the economy". This raises three major issues. Firstly government makes much of the thrust of globalisation and labour mobility and little of the need for traditional skills within the economy. It is our view that real and substantial demand exists and will continue to exist for many traditional craft occupations particularly in construction, engineering and agriculture and that training capacity and infrastructure must be upgraded to meet such needs. Secondly the "needs of the economy" are seen in effect as a snap-shot of the present. There is little scope therein for speculative training with a view to attracting new and developing industry or commerce or of initiating training developments prior to industrial location to this area. Inward investment will not be attracted where there is perceived to be a lag between plant installation and the ability of the workforce to make it fully operational and efficient in a short space of time. UCU believes that there is a need to have a workforce with a high level of generic skills who can easily adapt to changes in technology and production methods. Thirdly government strategies are focussed primarily upon the private sector. In Northern Ireland our economy is heavily reliant upon the public sector. The needs for education and skills development apply to that sector as much as to the private sector. The thrust of government policy has largely been to ignore this fact and to target resources and policies at promoting development of the private sector.

10. Thus "the needs of the economy" have to be articulated across the spectrum of economic activity. The use of labour market information and research will help - however a multi-agency

approach involving government, INI, the further and higher education sectors and local authorities will also be necessary. The engagement of the trade union movement is essential to that purpose. Such an approach in our view must also have a cross-border dimension.

11. Government has already identified an under-supply of persons qualified at technician level. We believe that applies as much to the public sector as to the private sector. Yet there is little by way of suggestions from government - beyond a reference to an unspecified expansion in the number of foundation degrees - as to how that issue is to be tackled. In order to meet demands for skills training across the economy, further and higher institutions must have some idea as to the numbers involved, the areas of the curriculum to be developed and their own staffing requirements. Whilst it is recognised that government has put substantial additional resources into further education since 1998 little of that has actually gone into the teaching process - it has largely been used by colleges to build up reserves, thereby diverting massive sums from useful social purposes, or put into administration. At the same time the pay of college lecturers has fallen compared to other sectors of education and comparable industrial groups. The sector is no longer seen as attractive to well qualified persons with industrial/commercial experience who can bring modern and relevant expertise into the teaching profession. Colleges do have recruitment problems in key industrial areas and many lecturers are leaving the sector for better opportunities elsewhere. The sector does have serious problems of low morale and work-related stress brought about by continual re-organisations and curriculum "initiatives". The sector has also been beset by a long running dispute over the issue of pay parity with teachers in schools. A resolution to that issue must be found otherwise the restructuring of the sector currently under way will be bedevilled by poor relations and lack of goodwill.

12. Government objectives regarding up-skilling of the workforce will not be met if it continues to ignore the genuine concerns of what is a key group of employees central to the delivery of its policy. Those charged with the responsibility of leading the further education sector must be supported by government to reverse the decline in lecturers pay compared to other sectors and to modernise pay structures in line with the Horisk report of March 2000.

13. In her "Programme for Implementation" Angela Smith almost in a passing reference states a key target the need for government "in consultation with the HE sector and employers, develop a policy for higher level skills and the enhancement of student employability". The Higher Education sector is a major player in developing the skills agenda. The notion that universities are academic ivory towers belies the reality that vast areas of their course delivery is at the highest level of vocational activity in producing trained specialists for engineering and science as well as highly skilled practitioners in medicine, health care and other professions which impact upon the lives of all of our citizens. The H E sector must be a central participant in the leadership of any skills development strategy. The introduction of higher fees in higher education will seriously impact on part time programmes designed to raise levels in professional and technical skills. This will impact on the widening participation agenda across Northern Ireland.

14. The government's skills strategy has several policy strands flowing from it. We refer to three of those strands in particular and provide detailed comment in the form of appendices in respect of two.

15. Central to skills strategy is Further Education Means Business - a policy involving significant restructuring of the sector into area based colleges and a change in the focus of colleges towards economic needs. DEL currently is engaged in a consultation exercise

regarding policies for implementation. UCU is highly critical of those policies for reasons we set out in detail in the attached Appendix 1.

16. A second element of the strategy involves Essential Skills training. The International Adult Literacy Survey of the late 1990s identified around 50% of the workforce in Northern Ireland as having the lowest, or second lowest, levels of literacy and numeracy. By way of response government established its Essential Skills Strategy which sought to have 18,500 persons having attained a qualification in essential skills by 2007. Starting from a base of 100 having such a qualification in 2003, government has made progress, however the scale of provision goes nowhere near meeting the needs of this society. Significant additional resources will be required if government is to bring about real change in upskilling this large section of the workforce. There is a need to provide free education support for all persons irrespective of age to achieve at least a level 2 qualification. Whilst welcoming the last few years investment in the training of a professional workforce to deliver literacy and numeracy skills in the post compulsory sector this funding is under threat at the end of this academic year. There are still shortages of skilled staff in terms of staff development or recruitment of new staff. Central funding and co-ordination would ensure the needs of individuals are met.

17. A third major plank in the strategy is the restructuring of Jobskills into a new scheme for Professional and Technical Training. Having been heavily criticised by the Public Accounts Committee of Parliament, government in Northern Ireland has proposed a major overhaul of training provision. Government's proposals will fail because of its insistence that the bulk of trainees will have employee status. Their proposals will also cause confusion as to the status of apprentice training and the currency or qualifications attained. We have made a detailed critique of the proposals which are attached as Appendix 2.

18. A fourth major element of an integrated education and skills strategy involves reform of the 14 – 19 curriculum. A significant start has been made with the introduction of the Vocational Enhancement Programme with its structured links between schools and the FE sector. This programme has been a success to date however from 2007 funding for the project will be re-organised and placed solely under the control of schools. UCU believe this programme must be progressed in partnership arrangements between schools and FE colleges where meeting the needs of the students is the primary consideration. We fear that the proposed funding arrangement will result in budget considerations becoming the primary driver. This programme is consistent with the proposals of the Costello Report and provides an excellent opportunity for the sharing of resources. UCU believes the potential for this important project would be maximised under a single government department for education and skills.

19. Other aspects of the Skills Strategy which require implementation include the development of an independent all-age Careers Information, Advice and Guidance strategy. Government was to have produced such a strategy by October 2006 however it is yet to appear. Crucial also is the need to reform vocational qualifications to a credit based framework of qualifications. For many years government has talked and written of the need for such a development however such a system remains only an aspiration. Government has proposed such a framework for the end of 2010. It is important that remains an objective. A further major aspect of a skills development strategy is the need to develop a menu of provision for those furthest from the labour market because of a range of barriers such as homelessness, addiction, ex-offender etc progress towards integration into the workforce.

20. In many respects government has already articulated many of the issues to be addressed and the actions to be taken. Our concern is that government's approach to this important area

is highly centralised and is characterised by a deep mistrust of those outside of a cadre of civil service mandarins. For a skills strategy to flourish it must have the acceptance and consent of those it seeks to engage otherwise they will not participate. It must be founded on a consensus with the governed and be based upon challenging but nonetheless realistic objectives which interests can buy into and to which they can contribute their particular skills and expertise for the greater good.

Appendix 1.

Further Education Means Business

Draft Policy Proposals issued by the Department of Employment and Learning

Comment by the University and College Lecturers Union.

The Department has titled its consultation document “Draft Proposals”. Not many people believe that. Although nominally in a consultation period, college principals across the sector are acting on the measures stated in the document – they clearly see this as set policy. Secondly consultation means listening to, and seeking to accommodate other views – few we have spoken to have confidence that views returned to DEL will result in any change to the directives already stated.

There is a large volume of words in the policy document; whilst UCU makes comment on the broad aspects of the policy direction, there are many aspects therein that we do not comment upon - it should not be assumed that a failure to comment on a specific policy implies agreement by UCU.

UCU believes the policies stated are calculated to fundamentally change the nature of further education in Northern Ireland from a publicly funded education service offering a wide range of courses, delivered locally and which offers second chance opportunities to thousands of our citizens, to one which is centrally directed by government officials with the primary objective of meeting the needs of private sector industry. UCU has always recognised the importance of further education to enhancing skills and raising the qualifications of those in work – the record of colleges in that regard is beyond dispute – but we regard the wider social and educational role played by colleges as being of no less importance. The thrust of the policies stated by DEL will be to strip out the latter and to re-position colleges into an agency role subservient to the whims of private sector employers.

DEL’s policies have at their core the notion that private sector employers have articulated and clearly specified training goals in respect of their workforce and that the route to being able to compete in the global economy lies in harnessing post school education and training to meeting those goals. These policies are based upon a pipe-dream far removed from the reality of the Northern Ireland economy.

The vision that most employers - large and small - will become vibrant and active participants of sector skills councils and lay before those who deliver education and training, a menu of their training needs, is fanciful. All the experience of the past thirty years shows that, whilst some employers do know, and can specify their training needs, the vast majority – particularly small employers – do not. Furthermore, there is little evidence - particularly in the case of small employers - that their priority is seeking to ensure high quality training for their employees. The overwhelming evidence is that unless education and training is available at no cost or inconvenience to them, small employers are unlikely to permit their employees to use such services. (UCU and its predecessor NATFHE have long argued that faced with such ingrained attitudes there is a case for government to re-establish a training levy on all employers.)

DEL itself is not confident of such employer engagement - why else would it rely upon the “Skills Expert Group” to do the thinking for employers and to drive Workforce Development Fora and Sector Skills Councils, which in turn will drive FE colleges. Who are these people on the Skills Expert Group? What is their record of achievement? On what basis can the citizens of Northern Ireland be confident that these anonymous maestros will have the foresight and leadership qualities to direct further and higher education to a future bright with prosperity and enlightenment? Does local democracy have any role in this vision for the future? Will community engagement and meeting local educational needs fit into any of this?

It is unrealistic to think that the Skills Expert Group or Sector Skills Councils or Workforce Development Fora can forecast labour markets with the precision DEL seems to expect. Planning has an important role, however it detracts from flexibility in meeting emerging or unanticipated needs. As envisaged, these policies will require a degree of micro management for civil servants reminiscent of a soviet style command approach. That will not work for a sector situated in a market economy dominated by small employers and a public sector which also has to meet a social need.

Having set its strategic direction, DEL proposes implementation by setting out four inter-related policies. DEL is careful to state the areas of curriculum delivery to be excluded from the exercise. What it does not state is that those areas together constitute a sizeable element of overall provision. How these curriculum areas are to be managed and accommodated where the remainder of the work is controlled in a departmental straight-jacket, remains to be disclosed by DEL.

Underpinning the policy directives is a seismic shift from the present college autonomy to one where the Department is to micro-manage the sector through its approval control over College Development Plans and the courses which are to receive funded delivery. Under these proposals the role of Governing Bodies is emasculated and college Directors will be surrounded by direction by DEL officials. How many civil servants will be required to scrutinise CDPs? What is their expertise in delivering teaching and learning? Why is it assumed that they have the expertise to make correct decisions rather than college staff?

Government’s role should be to set overall objectives for the sector and to have in place systems to monitor accountability. Thereafter government should trust college staff to get on with the job of educating students. The model proposed by DEL will result in an ever increasing raft of performance indicators and counters to watch every bean. Educating students is relegated to a consequence.

Section 3 of the document - "Support to Employers" - creates the impression that hitherto the sector has been totally lacking in that role. That impression belies the truth. The FE sector is at the forefront of meeting the education and training needs of the workforce. If that were not the case why would many thousands of adults in employment use the colleges for career and workplace development every year. Whoever wrote the section knows little of what is done by colleges or of the contribution made by hundreds of lecturers who deliver a first class service. Nowhere in the document is there any reference to the available evidence documenting what the colleges actually do. Instead the author moves on the basis of impressions gleaned from the baseless whinging of some sectional interests hostile to the FE sector and who would continue in the same vein even when the record states otherwise. Check the evidence found by the Education and Training Inspectorate.

The author continuing, by inference suggests that colleges do not ensure "an effective response to employers needs". That is not true. Underneath such is usually an attack on lecturers and their terms of employment - a less than disguised aspect of this agenda. Those who are prone to such harpings would do well to make themselves familiar with the workload of college lecturers and the true nature of their engagement with, and commitment towards, their students. Lecturers have previously met such attacks and shown them to be false.

Elsewhere in this section the DEL's vision for the subservient role of the colleges is stated explicitly – colleges "will provide the secretarial support for the WDF in its sub-region". (Will this be a free service or at full cost recovery?) In addition colleges are to provide out of their budgets a wide range of consultancy services to employers without any consideration of matters such as patents or intellectual property rights. (Has anyone asked the lecturers how this is to be done?)

This subservience is compounded in the enhanced role to be afforded to ANIC – an organisation which hitherto has a less than impressive record of demonstrated leadership for the sector. To place ANIC at the hub of relationships between colleges, foreign investors, Invest NI and indigenous business is to add an unnecessary layer of bureaucracy which will do little to enhance the responsiveness of the sector. If ANIC is to have such a central role it will require substantial investment in skills and expertise beyond what currently exists in that organisation. How is that to be funded?

UCU sees the concept of Industry Recognised Centres of Excellence as consistent with the enhanced role given to industry in its relationship with the FE sector. Time and application will tell if the height to which the bar has been raised in respect of recognition criteria is realistic or not. In setting such lofty criteria there is a danger that DEL is condemning the sector to failure from the outset.

Section 4 of the document considers the curriculum offer to be laid on by colleges. Again the priority is for colleges to focus on skills areas as identified by the Expert Skills Group. The funding arrangement for level 1 provision in priority skills areas is yet to be determined. It is clear however, that unless any provision falls within those priority skills areas or subject to external regulation, there will be no funding from DEL. This will force colleges to shed a major aspect of provision which hitherto has been aimed at assisting those who are furthest from the labour market or who have special educational or social needs. This policy will seriously worsen community education services. The capping of such provision to 10% of a college's totally funded enrolments is a damaging and prescriptive measure which will hit the poorest and most vulnerable learners in this society.

The Department leaves open at this time its plans for the delivery of academic “A” levels and GCSE courses in the FE sector. Over the past decade such areas of work have been deliberately run down by the Department - it will come as no surprise if such is to reduce further. The fact that colleges have made such provision in response to a strong student and parental lobby is ignored – if DEL removes such provision from the curriculum menu of colleges it will be a further retrenchment from wider community engagement. Furthermore the distinction DEL makes between “academic” and “vocational” is baseless – all qualifications are of assistance in career and professional development.

The proposals are explicit that only those courses in priority skills areas are to attract funding. The converse of this is that some 80,000 students (mainly adults) taking so called non-vocational courses are likely to face the loss of low cost accessible education close to home. The teachers who service those courses are likely to lose their jobs. Colleges will lose the showcase aspect of this service to thousands of mature adults as well as their goodwill. Another community service is being cut.

Section 5 of the document seeks to privatise a major section of learning currently delivered by colleges. This has also been long trailed. The evidence underpinning this policy direction DEL happily admits is “uncorroborated”, furthermore the Department states “it is not possible to conclude that outsourcing FE college provision to non-statutory providers....would widen learner access” - yet it decides to take that route anyway. Fermanagh College took such a route in the recent past - the Deloitte and Touche Report (August 2006) shows where such cavalier relations can lead.

To cover its back the Department puts responsibility on colleges to ensure that those organisations to whom they outsource work meet all minimum requirements. Furthermore the colleges have to meet the costs of setting up such arrangements whilst the private sector can reap any rewards. DEL’s approach here will hit a large range of courses in community education that provide opportunities for people living in areas of multiple deprivation and social exclusion. Those communities need support from dedicated and trained, specialist and professional educators – they will be poorly served by anything less. Tutors with as yet non-defined LLUK qualifications, have nothing like the qualifications and teaching experience of existing college lecturers. Access provision must remain central to the mission of further education and be delivered by qualified college lecturers in response to a public need.

Section 6 of the document reveals a new approach to the funding of colleges. We accept the current system has its faults however the new system far being a distributive mechanism is a control mechanism and an instrument to cut expenditure. The divisor used for relating part-time student hours to full-time equivalent is likely to become a norm for teaching hours. Our fear is that if 450 hours of study only will be funded by colleges, this will have the effect of reducing tuition time to students to 15 hours per week for 30 weeks in the year.

No educational argument is advanced to justify the selection of the figure of 450 hours and there is little explanation as to why that figure has been selected. Indeed the purpose of its selection is less than clear in the document. This must be addressed. A decision with such important consequences warrants justification supplemented by evidence to support the argument. Teachers know well that such constraints will make it impossible for large numbers of students in FE to reach their attainment targets.

FE students generally enter the system with lower levels of attainment than those who go on the university at 18; the value added in FE is their pathway to higher education and/or

employment and career advancement. However most vocational courses for these young people require tuition and support well beyond 450 hours - and that must be funded. If tuition time is reduced to 450 hours for a full-time student it will seriously damage the future educational prospects of large number of students. It is also likely to spawn an 11+ style unregulated private tuition industry for the post 16 sector. Funding per student in FE should be no less than that afforded to students in schools. Students in further education should not be subjected to a second class system with a lesser educational experience that a similar student undertaking the same level of educational experience in a grammar school or sixth form college. The other tinkering with the formulaic approach to funding pale into insignificance against prospect of this cut in funding of tuition time and the devastating consequences that will have for the educational welfare of large numbers of further education students.

In summary UCU see these proposals as consistent with the FE Means Business agenda – an agenda about cuts in public expenditure and contraction of a public service. Furthermore these proposals are concerned with centralising decision-making regarding the provision of public sector further education and placing it in a role subservient to the whims of the latest industry fashion. It is far from an agenda which seeks to promote lifelong learning or one which seeks to educate our citizens – of all ages – to have the skills to cope with life’s challenges, as well as those they will meet in employment, in a rational and reflective manner or to take pleasure in the joy of learning for its own sake.

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Appendix 2

DEL Consultation Training for Success: Professional and Technical Training

A comment on the Department of Employment and Learning's Consultation Document by the University and College Union.

Introduction.

The Committee of Public Accounts of the House of Commons described the Department of Employment and Learning's Jobskills programme as **“one of the worst-run programmes that this Committee has examined in recent years”**. The Committee noted **“a quite astonishing catalogue of failures and control weaknesses, all of which pointed to a disturbing level of complacency within the Department”**.

For years trade unions and other bodies had voiced their concerns regarding the lack of quality and accountability in DEL's stewardship of the Jobskills programme. Perhaps in the light of what has been a monumental failure there is a chance that on this occasion our views will not be so lightly dismissed.

UCU views “Training for Success” as something of a panic reaction by caned civil servants to put distance between themselves and the expenditure of half a billion pounds for what was considered poor value for money by the Public Accounts Committee.

The introduction to the Consultation Document argues that **“the education landscape in Northern Ireland today is significantly different to that in1995”** as a result of further education reform and the implementation of the Post primary Review. It considers this to be a primary reason for the new proposals. The difference referred to is far from clear. As yet - apart from tentative developments in the form of the vocational enhancement programme - little has changed in FE or in the pattern of young persons moving into employment or higher education.

The proposals are based at best upon a guess as to the likely shape of relationships between schools and post school institutions and employment opportunities. There is little in the document by way of statistical evidence relating to patterns for progression for young persons at post -16, demographic trends for the groups at issue, youth unemployment or those staying on in full-time education. DEL's Jobskills statistical information at 31st Oct.2003 shows over 15,000 participants in the programme. There is little evidence that there has been a significant decline in the numbers likely to continue to avail of the programme.

It is true that unemployment has fallen in recent years. Precisely how this trend impacts upon the groups covered by Jobskills however is far from clear. Such persons were not seen as unemployed in the first instance. There is no evidence presented by DEL to support the view that employment opportunities are sufficiently buoyant so as to facilitate the vast majority of those, who in past years would have entered the Jobskills Access or Traineeships (over 9,000 annually), will now enter the employment market as paid employees and apprentices.

Any training provider will give masses of evidence as to the difficulties in securing job placements for one or two days a week for such young people – at no cost to an employer. It will take a quantum leap both in terms of employers attitudes and employment opportunities for the groups at issue for the numbers concerned to move in the short term to employed status. For DEL to expect that employers will readily employ considerable numbers of these trainees and pay industry rates or at worst the minimum wage is aspirational in the extreme.

Industry trends also show that those areas where apprenticeships had traditionally been an important route to higher level skills - such as in craft trades and engineering - continue in decline and indeed that the shortfall in skills, where they exist, are not being addressed by employers training for the future, but by the recruitment of migrant workers. UCU believes the Department's strategy will prove to be fundamentally flawed from the outset unless it reconsiders its mandatory requirement for employed status at level 2.

Response to DEL's Questions

Q1. What is your view of the Draft Principles?

A. Firstly the dropping of the Jobskills title is welcomed. The principles of flexibility and individuality are important however employers and providers of training will for reasons of cost inevitably insist that time is not without limit – That being so there is a need for a government steer regarding the expected duration of any programme. UCU also supports progression and a qualifications framework and measures to ensure quality and control standards – the mistakes of the past must not be repeated.

Just as important as principles is the outworking of the scheme. The completion (success) rates for Modern Apprenticeships under Jobskills at around 40% was low compared with the 65 -70% success rates in countries such as Germany, France or Denmark. The revised scheme will only have credibility when it can demonstrate similar levels of achievement.

In England the Adult Learning Inspectorate has criticised the highly variable quality of provision commenting “an apprentice's chance of receiving a good training, a decent preparation for a career, is largely determined by which sector they enter” (ALI Annual Report 2003). The same can be said for Northern Ireland. Whilst a number of larger employers have an excellent track record in their treatment of apprentices trade unions and others have been critical of abuses in approach where employers – particularly SMEs - have failed to pay industry rates or honour contractual agreements; where young persons have been viewed as a source of cheap labour performing tasks which could be described as anything other than training; where abuses of health safety and welfare standards and the frequent denial or obstruction of day release education requirements have been widespread. Quality assurance must mean that abuse will not be tolerated and that any employer not fully complying with the rights of trainees will be removed from participating in any training programme.

Q2. Are there any improvements or other cross-cutting issues which should be addressed?

A. We have a concern regarding the role of Sector Skills Councils. Only a small number of Sector Skills Councils in Northern Ireland are worthy of the title and have the wherewithal to set industry standards. These tend to be associated with larger employers who themselves have had a traditional commitment to high quality training. These are the exceptions. Most

SSCs have a long way to travel both in terms of having credibility to act on behalf of a sector of industry and in having the commitment of employers. In an economy dominated by small employers the likelihood of establishing common industry standards on a voluntary basis in the short and medium term is low. **There is a case for government, acting with social partners and specialist providers of education and training to take a lead in determining the curriculum where industry is unable to deliver.**

Q3, What is your view of the proposed range of flexible new provision?

Q4. Do you agree that the emphasis should be on apprenticeships?

Q5. Do you agree that there is merit in introducing a specific Level 2 apprenticeship?

Q6. Do you agree that employer engagement is central to a new era of training provision?

A. The opportunity to take part in pre-apprentice training is welcomed. This however needs to be placed on a proper footing so as to ensure that young people have real experience of working in industry. Collaborative arrangements between schools and FE colleges and other participants must be on the basis of a partnership of equals. The FE sector with its historic links to business and industry coupled with the industrial experience of its lecturing staff must be a key participant in the determination of curriculum developments in this area.

The concept of a two tier apprenticeship is problematic. The introduction of a level 2 apprenticeship will be confusing to employers, young people and their parents. It will undermine the traditional concept of an apprenticeship as a route to highly skilled employment and career progression into professional qualifications and higher education. It will establish the vocational/academic debate into a new area in employment. The Level 2 element of the programme should not be classified as an “apprenticeship”. UCU supports progression from level 2 into an apprenticeship at Level 3 but we are of the view that the high currency value placed the “apprenticeship” title and understood by all should not be diluted.

The “addressing barriers to employment” section is predicated upon the notion that numbers will be relatively small. We accept that will be the case for those with personal barriers to overcome. The real barrier for a large number of young people with lower educational attainment however will be accessing employment - currently the numbers in the Jobskills programme who do not have employee status stands at over 9,000. Employers have not sought to engage this group hitherto. The incentive offered to employers to employ young people at level 2 will not be attractive to them and in many cases the jobs are simply not there. No proposals exist for this group of young people. Many of these will be resistant to continuing on at school or to entering full-time further education. What alternative opportunities will be available for this group. This is a major gap in the Department’s strategy.

Q7. Should contracts for Level 2 and Level 3 Apprenticeships be offered to industry recognised bodies/employers or to training organisations or both.

A. The two options should be employed. Where there is a record of past commitment contracts for level 3 apprenticeships should be available to industry recognised bodies and employers. These do not exist in many of the Groups identified by DEL. Where such is the case contracts should be available to recognised training organisations with a proven record of achievement and who meet the quality assurance standards of the ETI.

Where level 2 trainees do have employed status contracts should be available to industry recognised bodies and employers subject to the concerns raised above. However where

employed status is not available contracts should be available to recognised training organisations with a proven record of achievement and who meet the quality assurance standards of the ETI.

Q8. Do you consider that training organisations who act solely as a Managing Agent should be able/unable to tender for occupational parties delivered by a third party.

A. Such bodies engage in training schemes for the purpose of making a profit. Only those organisations who have a direct interest in the career development of trainees through employment or education should be involved.

Q9. What is your view of the proposed funding model?

Q10. Is the Proposed funding model too complicated ?

Q11. How would you feel as an employer or a supplier operating under the proposed funding model?

A. The funding structure is complex. It also reinforces gender bias. The level of funding for those areas of employment usually accessible to females are funded to a much lesser extent than those usually accessible to males. How is this justified when apprentices in each group will work to a similar level of attainment in qualifications? Employers outside of Group 6 also will feel that their contribution to the social economy is valued less by government.

More information and estimates regarding the total amount government is prepared to allocated to the programme based upon anticipated numbers of participants would have helped. For example some indication of the expectations of government regarding the number of participants on the apprentice route, the personal development route and the non-NVQ based provision would have helped. It would also have been useful if this latter group are to be a continuing group or as is inferred those currently on programmes and who will merely see them out. A comparison between what is to be available and what was available under Jobskills would have set a useful context for comment. It would also have been helpful to know how the funding levels of particular groups have been determined.

There is frequently a suspicion that government initiatives may be designed to cut costs to the public purse. In the absence of a transparent statement of overall projected costs it is difficult to conclude otherwise. Firstly costs will be reduced if the vast majority of trainees are moved to employed status. Secondly it is intended to remove from trainees the current (and appallingly low training allowance) and replace it with means tested EMAs. For families with an income £25,000 + and whose son or daughter is unable to access employed status this will an increased financial burden to them.

In any event at £40 per week the Minimum Training Allowance is far too low and should be raised to the minimum available under the Job Seekers allowance. There is an issue here of age discrimination applied by government.

On a more positive note UCU welcome the recognition given to “distance travelled” by way of attainment. We believe however that no distinction should be made between the levels of payment at particular milestones.

The funding model could be considerably simplified and made fair by making all funding as at Group 6 for all schemes.

Q12 What is your view of the proposal for revised travel arrangements?

A. These are to be paid only to those on the Barriers to Employment option. They should be available to all trainees with non-employed status and they should include reimbursement of actual costs incurred.

Q13. Do you agree EMAs should be extended to unwaged trainees.

A. There is a danger that if this is made mandatory many young people will be forced to leave home and seek to live independently. For many it may not be in their best interests to live outside of a supportive family environment. There should be a change in social security regulations to permit a young person in training to receive the equivalent of the job seekers allowance for the duration of the programme without this impacting upon other family benefits.

Q14 Do you agree that Level 2 and Level 3 Apprenticeship provision should be available to adults over the age of 25.

A. Government is introducing legislation to prevent discrimination on grounds of age. All post-school age groups for employment should be treated equally in training opportunities. DEL's Equality Impact Assessment of 2004 has identified past policy as impacting adversely upon equality of opportunity.

Q15. Is there merit in introducing a lower level upskilling initiative and in what circumstances?

A. Yes. As well as there being a need to up-skill existing employees in many areas of employment a new and growing group of employees mainly from the New Accession States of the EU are entering the Northern Ireland workforce. There is a massive need for education and training in English as a Second or Other Language (ESOL). A new funding stream should be developed to cater for this need.