

UCU policy on apprenticeships and apprenticeships charter

1. Background and existing UCU policy

1.1 The UCU Education Committee produced a paper in 2014 on Vocational Education and Training setting out UCU's support and commitment to good quality apprenticeships for young people. The following principles have formed UCU policy on apprenticeships since then:

- apprenticeships should have education at their heart, with mandatory off-site learning
- revert to under-25s only with an alternative education programme for older adults
- move towards a statutory three year minimum duration
- abolish the gap between national minimum wage and apprenticeship minimum wage
- certified professional title should be awarded upon completion
- fiscal measures that will work for small and medium enterprises – tax credits, wage subsidies, grants from levy system
- employers should contribute financially to training through levies proportionate to size.

Over the last 4 years apprenticeships have continued to be subject to government reforms in England and have benefitted from a raised profile as an alternative route to classroom based further and higher education. The issue of 'homegrown' skills has also risen up the agenda in light of the result of the EU referendum. Given the sustained spotlight on apprenticeships and the need for UCU to maintain relevant and appropriate policy, this paper updates and expands existing UCU policy on apprenticeships and also incorporates our core principles for a National Education Service:

- fairly funded so cost is never a barrier to participation
- accessible to everyone regardless of age, background or circumstances

- expansive with support for a broad curriculum and a range of delivery modes
- flexible so providers can respond to changing and emerging needs
- coordinated with clear links and pathways between different parts of the system
- accountable to students, staff and the communities it serves
- high-quality with learning at all levels delivered by highly-trained, well-supported professionals.

UCU FE Sector conference resolved at annual Congress May 2018 to campaign for a properly funded apprenticeship scheme that:

- a. pays a living wage to apprentices
- b. encourages employers to provide apprenticeship opportunities to young people
- c. protects apprentices in the event their employer/training provider faces financial difficulties
- d. does not allow employers to be their own training providers
- e. recognises that FE Colleges are best placed to deliver apprenticeship training
- f. remains committed to understanding and assisting the lives of young people facing inequalities in life chances related to factors of class, disability, gender identity, race, sex and sexual orientation
- g. undertakes research to ensure effective support for young people facing adverse life chances including all protected characteristics
- h. ensures that the exclusion of sexual orientation factors in recent research into the impact of apprenticeships in lives of learners is addressed and not repeated.

1.2 **History and importance of apprenticeships**

By the mid-1960s around 33% of male school leavers aged 15-17 entered some form of apprenticeship programme. However after the 1960s the numbers engaged in apprenticeships declined significantly across most occupational areas. A combination of a decline in skilled manual jobs and the rise in post-16 education meant that the number of apprentices dropped from a high of 243,700 in 1966 to just 53,000 by 1990. This period also ushered in an era of continuous change and reform in the technical and vocational education sector. These included the creation of the Industrial Training Boards (ITBs) and their abolition in the 1980s, the Certificate of Pre-Vocational Education (CPVE), National Vocational Qualifications (NVQs) and numerous initiatives including

Youth Training Scheme (YTS) and the Technical and Education Initiative (TVEI). The majority of these were designed for the young unemployed, but unfortunately further contributed to the already low status of technical and vocational education and were more about social engineering, cheap labour and massaging the unemployment statistics for political advantage.¹ We can clearly see how the frequent changes to the structure and nature of vocational education stand in contrast to the relative stability that has existed for academic routes.

In 1994, the Conservative government launched 'Modern Apprenticeships'. Modern apprentices would receive a wage as employees and were required to work towards a National Qualifications Framework (NQF) Level 3 qualification. Foundation Modern Apprenticeships at Level 2 were set up in 2000, and higher-level apprenticeships became available from 2004. The upper age limit of 25 for apprentices was abolished in 2003.

Today, an apprenticeship must be a full-time paid job (of at least 30 hours a week), lasting at least 12 months. 20% of the apprentice's time must be spent in off-the-job training. In addition, each apprenticeship must fulfil the criteria under a government-approved 'framework' or 'standard', which specifies the skills that need to be gained as part of the apprenticeship. They can be intermediate (L2), advanced (L3), Higher (L4+) or Degree level apprenticeships (L5-7).

The most recent DfE destinations data show 6% of pupils after key stage 4 and 7% after key stage 5 take apprenticeships² although key stage 5 data only shows those taking L3 qualifications, and not all young people will move directly into apprenticeships from full time education, so the actual proportion is likely to be higher. A cohort study undertaken by CVER found that about 17% of young people started an apprenticeship at some stage between the age of 16 and 22³. Apprenticeships provide a distinctive route to education and employment that is highly valuable:

- apprenticeships directly connect young people to the labour market and provide a transition from education to employment
- offsite learning complements and underpins workplace learning
- forms part of a diverse vocational sector ensuring those who want to simultaneously earn and learn have that opportunity

¹ <https://technicaleducationmatters.org/2011/01/06/short-history-of-apprenticeships/>

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/651012/SFR56_2017_Main_Text.pdf

³ <http://cver.lse.ac.uk/textonly/cver/pubs/cverdp015.pdf>

- offer a route to higher levels of learning and/or career paths contributing to an educated, productive, innovative and engaged workforce and citizenry.

Apprenticeships offer a significant earnings premium for those who take them over other similar level qualifications. Men who start an apprenticeship earn 23% more than those who left school with only GCSEs, and roughly 16% more than those who left education with a level 2 vocational qualification. For women, those who start an apprenticeship earn 15% more than those who left school with only GCSEs and about 4% more than those who left education with a level 2 vocational qualification. For those educated up to level 3, men who start an apprenticeship earn about 37% more than those who left education with A-levels and about 35% more than those who left education with a level 3 vocational qualification. Women who start an apprenticeship earn about 9% more than those who left education with A-levels by the time they are age 28. They earn roughly 15% more than those who left education with a level 3 vocational qualification.⁴

Given the value of apprenticeships to individuals and society it is right that they have risen up the policy agenda but there are still too many opportunities that are of poor quality, and do not lead to additional or sustainable jobs. Conversely there are still lots of young people excluded from apprenticeships because the labour market conditions are such that the job opportunities do not exist, and inequalities in the labour market are also reflected so entry level or pre-apprenticeships are not easily accessible to all.

1.3 UCU critique of current reforms in England

All reforms must be considered in the context of whether they enhance the quality of apprenticeships. Unfortunately the manifesto promise to reach 3 million more apprenticeship starts over the course of a parliament has hitherto driven apprenticeship growth at the expense of quality. The tide is perhaps now turning with the Skills Minister rowing back from the 3 million figure but unfortunately a lot of damage has been done, with poor quality apprenticeships proliferating, rather than being rooted out, of the system. The recent announcement by the DFE that it has asked police to investigate fraudulent practices within the largest provider that has received £30 million of government funds, 3aaa, reveals just how broken the government apprenticeship programme is.⁵

One of the most eye catching government reforms has been the introduction of the apprenticeship levy for large employers. The apprenticeship levy, although providing a funding boost for apprenticeships directly from employers, does

⁴ <http://cver.lse.ac.uk/textonly/cver/pubs/cverdp010.pdf>

⁵ <https://feweek.co.uk/2018/10/11/df-refer-3aaa-to-police-following-investigation/>

little to influence where apprenticeship opportunities are, at what level, or who can access them. It is too easy for levy paying employers to recoup their payments by rebadging existing training schemes as apprenticeships and because apprenticeships can be taken by people of any age, there are quick wins to be had by converting experienced, existing staff into apprentices without creating any additional job opportunities and the investment needed in a new member of staff. Young people in particular therefore are disadvantaged by the tendency to create apprentices from incumbents.

There has been significant growth in the number of management and senior executive apprentices through the creation of apprenticeship MBAs.⁶ Even in places of education such as the University of Sheffield their own managers are being enrolled onto its own MBA in senior leadership.⁷ While education for all staff is welcome, there is a question over the effectiveness of the levy if more funds are being directed at senior staff (who usually benefit from more investment in their training than junior staff anyway) at the expense of hiring new apprentices and creating additional job opportunities. UCU would therefore like to see robust evidence that the levy is being used for additional opportunities, is meeting the skills needs of the workforce, and is paving a way to progression to learning at higher levels rather than being used to enhance already highly skilled employees.

There is no mandatory requirement for qualifications within the new apprenticeship standards – even those at degree level. UCU believes that qualifications play three important roles for the individual and society:

- entry to or progression in the labour market
- preparation for lifelong learning and higher levels of education
- support for social inclusion and citizenship.

The Institute for Apprenticeships lists three instances where a qualification might be mandated within an apprenticeship standard as an exception:

1. a regulatory requirement
2. a requirement of a professional body
3. required by employers in the labour market on such a widespread basis that an apprentice would be significantly disadvantaged without it.

Even then, they state that the expectation for mandating a qualification would

⁶ <https://www.ft.com/content/f4bd5e9c-4fb4-11e8-9471-a083af05aea7>

⁷ <https://www.timeshighereducation.com/news/sheffield-spends-apprenticeship-levy-managers-taking-its-mbas>

be only a temporary requirement.⁸ There are graduate professions such as nursing and teaching which are being developed as apprenticeships and are at real risk of being deprofessionalised if qualifications are removed. In a system where employers have ownership over designing standards, can be their own training providers and provide their own external quality assurance, an independent qualification ensures the education has transferable value both in the labour market and for further study. We must also be mindful of creating further divisions and value judgements between academic and vocational routes. If traditional modes of study lead to stand alone qualifications then vocational routes that do not may come to be seen as of lesser value. This is a particularly important point if those students following vocational routes are more likely to come from low participation backgrounds. UCU therefore objects to this stripping out of qualifications from apprenticeships.

The definition of apprenticeships used by the Institute is 'a job with training to industry standards'.⁹ UCU does not believe this reflects the central importance of education within apprenticeship programmes. Apprenticeships are not just about training for tasks or for specific job roles, they should also encompass democratic citizenship, rights and responsibilities at work, the role of unions, environmental issues and a range of skills such as critical thinking, problem solving and teamwork to ensure the apprentice receives a well-rounded education that has transferable value and will increase their engagement with learning and society. Too many of the new standards approved by the Institute are for specific job roles without any of these wider learning objectives, plus off-the-job training can be provided by the employer, so there is no guarantee that this will offer a broad based education to the apprentice. The OECD found that in England, general education (including maths and English) adds up to about 50 to 100 hours over the duration of an apprenticeship whereas German and Swiss apprenticeships require 400 hours of general education across a range of subjects, in Norway it is 600 hours.¹⁰ People with transferable skills, developed through a broad and expansive education are those who will be able to weather economic shocks and technological change the best. Apprenticeships should therefore equip learners with the skills needed to navigate their way around challenging and difficult social and economic climates.

With education forming the core of apprenticeship programmes, we would expect to see educators also having a role in their development. However the focus has been on employer-led reform rather than meaningful partnership

⁸ <https://www.instituteforapprenticeships.org/developing-new-apprenticeships/developing-and-writing-an-apprenticeship-occupational-standard/>

⁹ <https://www.instituteforapprenticeships.org/quality/what-is-a-quality-apprenticeship/>

¹⁰ https://read.oecd-ilibrary.org/education/apprenticeship-in-england-united-kingdom_9789264298507-en#page1

working. The development of high quality apprenticeships depends upon teachers having the time and space to cultivate mutually beneficial relationships with industry. There is added value in working together but because of the focus on employers and the impact of cuts to FE funding and increased workload for teachers, this partnership approach is not achievable under the current reform programme.

This has contributed to the emergence of narrow standards, with employer led trailblazer groups focussing on specific jobs rather than occupations. Furthermore by their nature, large employers find it easier to participate in such groups and the interests of the large employers therefore dominate over small and medium sized employers. Furthermore the case for putting employers in the driving seat is not proven. An evaluation of the employer ownership pilot which ran from 2012 to 2017 found that it did not increase participation in training among employers who were not already investing in their workforce, and that no higher levels of training than that which already occurred among employers who did have a positive attitude toward skills investment.¹¹

There is a lack of commitment to tackling inequalities in apprenticeships. Although some equalities monitoring takes place, this does not focus on the levels or sectors of apprenticeships. It also does not look at gender at all, presumably because women make up over 50% of apprentices. This is a mistake because apprenticeships remain highly gendered with women much more likely to be in sectors offering lower wage returns and career opportunities:

For under 19s in 2013/14, 98% of construction apprenticeships, 97% of engineering apprentices and 86% of ICT apprenticeships went to men. The significance of this is that work in different areas offers different chances for pay and career progression. Traditionally gendered career choices – which have a far reaching impact on lifetime opportunities – are being reinforced by current arrangements.¹²

There are similar concerns for black¹³ apprentices, as Jeremy Crook, Chief Executive of the Black Training and Enterprise Group, writing for the Learning and Work Institute points out, "BAME people remain particularly under-

¹¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/742067/Evaluation_of_the_Employer_Ownership_of_Skills_Pilot__Round_1.pdf

¹² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/509123/Social_Mobility_and_Child_Poverty_Commission_Submission_on_Apprenticeships_final.pdf

¹³ In UCU the word black is used in a political sense to describe people who self-identify as being from a visible minority (more usually from an Asian or African heritage) with a shared experience or understanding of discrimination

represented on apprenticeships in sectors like engineering and manufacturing, where average earnings tend to be higher, and over-represented in lower earning sectors such as retail.”¹⁴

Apprenticeships can also only be offered as full time job roles. This excludes those with caring responsibilities or health conditions that make it difficult to take up full time work, which disproportionately affects women and people with disabilities. Furthermore disabled apprenticeship applicants have to contend with employer prejudices about their abilities and reluctance to make reasonable adjustments for disabled employees.

The apprenticeship reforms have been a real missed opportunity in addressing these inequalities. UCU would like to see additional supplementary funding and access to work funding to improve access to apprenticeships, mandatory employer reporting on the apprenticeship gap for people with protected characteristics (similar to mandatory gender pay gap reporting) and better advice and guidance so that women, black and disabled apprentices stop being disadvantaged by overrepresentation in lower paid sectors.

The quality assurance arrangements for apprenticeships are complex with the Institute, Ofqual, Ofsted, Education and Skills Funding Agency (ESFA) and DfE all playing a role. This makes lines of responsibility extremely unclear when accountability and transparency should be paramount. External quality assurance of the end point assessment for a standard is similarly complex with four different options available (employer led, professional body, OFQUAL or the Institute).

The Register of apprenticeship training providers is no guarantee of the quality of the provider but potentially gives a false impression to employers and apprentices because the training provider has been included on an official register. As highlighted by sector press, good quality and established providers were excluded from the register while organisations with no track record were included.¹⁵ The ESFA has been playing catch up to regulate new entrants to the market¹⁶, but given the high profile of apprenticeships robust quality arrangements should have been in place at the outset and there can be no excuse as to why they were not.

Finally UCU has concerns that vocational reforms are not being coherently

¹⁴ https://www.learningandwork.org.uk/wp-content/uploads/2018/06/All-Change_Where-next-for-apprenticeships-1.pdf

¹⁵ <https://feweek.co.uk/2017/12/15/non-levy-tender-shocker-defunct-provider-gets-contract-but-outstanding-college-misses-out/>

¹⁶ <https://feweek.co.uk/2018/08/16/ofsted-given-final-say-over-new-apprenticeship-provider-quality/>

developed - for instance the DfE is developing new T Levels which require a substantial industry placement, but their own research shows that this will have a negative impact on the number of apprenticeship places available for young people.¹⁷ The apprenticeship reforms have already led to a fall in the number of people starting an apprenticeship, and although some turbulence in numbers is to be expected while bedding in a new system, to have a sustained fall while simultaneously talking up the validity and popularity of the apprenticeship route is fuelling disappointment among young people who are unable to secure the high quality opportunities they need.

1.4 **UCU's alternative: A Charter for REAL jobs and apprenticeships**

For too long the blame for youth unemployment and skills shortages has been laid at the door of bad courses and bad teaching. UCU rejects this. Our members know that successive government policies and the failure to fund education properly have led to too many young people being excluded and marginalised from education and work.

The technical and vocational sector has been in a state of constant revolution since the 1960s, often to try and mask the failings of government to provide decent employment opportunities for young people. Over the last 35 years the failure of government policies to provide well paid, secure jobs has led to the institutionalisation of mass unemployment and precarious employment practices amongst young workers.

The current government apprenticeship policy of achieving 3 million apprenticeships is in tatters. The recent announcement by the DfE that it has asked police to investigate fraudulent practices within the largest provider that has received £30 million of government funds, 3As, reveals just how bankrupt the government apprenticeship programme is. Its focus on the wants of employers above the needs of apprentices and the expertise of teachers has led directly to this fiasco. This needs to stop – our young people deserve better.

UCU wants an expansion of *high-quality* apprenticeships. These must have education at their heart, and relate to real job opportunities, and get to the root of tackling inequality in access to education and the labour market.

High quality education and clear progression routes

- Apprenticeships must offer a clear programme of education and training that restores the link to occupational identity combined with a broad based underlying curriculum.
- Off-site learning is of vital importance throughout the duration of the

¹⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/737471/Employer_Capacity_Report.pdf

programme. Time away from work allows the apprentice to embed their learning, to participate in critical reflection, join a community of learners and develop the theoretical underpinning necessary to practise their craft. It also prepares the ground for learning at higher levels and allows them to receive English and maths education from specialist teachers. UCU believes that colleges are ideal places to foster these types of learning.

- Partnership working between industry, teachers and trade unions will provide the right apprenticeship programmes for individuals, communities and employers. Teachers must be given the time, space and resources to cultivate these relationships for mutual benefit.
- There must be clear transition points available between different levels so apprentices are able to progress more easily to higher levels of education and don't fall out of learning by default once their initial apprenticeship is complete. We need more work to be done to ensure we are opening up access to higher and degree apprenticeships, and that they aren't just going to people with existing high level skills.
- It is essential that the stripping out of qualifications from apprenticeships is reversed.
- Quality assurance arrangements must be urgently reviewed to clarify lines of responsibility, prevent the approval of apprenticeship standards that are too narrow, and ensure tough action is taken when the education provided is not up to scratch.

Fairness and Access

- Apprentices should have parity of terms and conditions with all other employees. They must be paid a fair rate and the gap between apprenticeship minimum wage and national minimum wage should be abolished. All quality apprenticeships will have progression opportunities to genuine employment and will not be a way of cutting costs by employing staff more cheaply on a temporary basis.
- Many apprenticeships go to existing employees. This needs careful monitoring to ensure that those who need them most to get into work are not being excluded. While we would not wish to prevent existing staff from taking up apprenticeships where this will genuinely improve their career and learning opportunities, it is important that the focus shifts more toward providing *additional* labour market opportunities. This also means refocussing apprenticeships as a programme for young people – currently people aged 25 and over account for nearly half of all apprenticeship starts.¹⁸

¹⁸ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN06113#fullreport>

- All levels of apprenticeships should offer equal access for marginalised and disadvantaged groups. This will require robust Access to Work funding and reasonable adjustments for disabled apprenticeship applicants, plus supplementary funding to support the entry of underrepresented groups including those from the most disadvantaged areas and backgrounds.
- Employers should reflect the communities in which they work, and annual reporting on 'the apprenticeship gap' for those with protected characteristics (similar to mandatory gender pay gap reporting) by levy paying employers should be required. UCU also has a role to play in holding our own institutions to account to support those from disadvantaged or non-traditional backgrounds to move into the teaching profession so that the education workforce more broadly reflects our students.
- Employers must take the educational needs of their employees seriously. They should be given a statutory right to paid educational leave and to workplace training committees. Trade unions must be given negotiating rights for education and training.
- There needs to be scope for part time and flexible apprenticeships to be developed. Currently apprenticeships can only be offered as full time jobs. This excludes anyone who needs more flexibility in their working arrangements.
- We need to recognise the important role of impartial information advice and guidance in addressing some of the inequalities in apprenticeships. Young people need good information about different pathways, sectors and the choices available to them. A high quality, face-to-face service is essential if we are going to stop replicating the trend whereby women, black and disabled learners often enter into lower skilled, lower paid sectors.

Climate jobs

- Finding a solution to the climate crisis will help solve the economic one. We need jobs that deal with the impact of climate change as well as those that will prevent a further descent into global warming.
- The Labour Party manifesto pledge to create 500,000 climate jobs is one that UCU fully supports. We believe that it would provide the basis of creating tens of thousands of well skilled and secure employment opportunities for young workers. Colleges must be at the centre of training and educating this future pioneering workforce.
- The green skills gap is now a major stumbling block to delivering a Just Transition to a zero-carbon economy. An integrated skills strategy should cover:

- the effective embedding of Education for Sustainable Development across the curriculum
- the rapid introduction of a short-course sustainability skills programme to train the existing workforce
- an expansion of quality apprenticeships based on a coherent system of delivery addressing the inequalities in apprenticeships to ensure access by under-represented groups
- promoting effective community engagement by the further and adult education sector to support the supply and demand issues of skills and jobs

Funding

- Teachers transform lives. A high quality education is underpinned by an experienced and dedicated workforce. Apprenticeships and vocational education are central to the government's ambitions for delivering a successful industrial strategy, however teachers in further education are now earning around £7,000 per year less on average than teachers in schools. If the sector is to remain vibrant and resilient to future challenges we must ensure that the workforce is well paid and well supported.
- Funding bands for apprenticeships must reflect adequately the cost of training and education. Trying to force a market where employers negotiate the cost is inappropriate and will not lead to the best standard of education.
- Additional support funding must be increased and linked to ensuring equal access to apprenticeships.
- The apprenticeship levy needs to be broadened out so that employers can spend the money on the most appropriate type of training for their workforce rather than the levy driving the investment decision. This will help protect the integrity of the apprenticeship brand.
- To allow the FE sector to properly plan how they are going to be able to educate and train the future workforce its funding allocation must be, at least, on a three-yearly basis. The present yearly cycle of funding allocation does not allow colleges to plan provision that meets the long-term needs of the workplaces and communities they serve.