



Annex 2: Consultation on preventing misuse of the term ‘apprenticeships’ in relation to unauthorised training response form

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is 19/08/2015

Please return completed forms to:

Apprenticeships Unit
Department of Business, Innovation and Skills
2nd Floor,
1 Victoria Street,
London,
SW1H 0ET

apprenticeshipslegislation@bis.gsi.gov.uk

Please tick the box below that best described you as a respondent to this consultation:

	Business representative organisation/trade body
	Central government
	Charity or social enterprise
	Individual
	Large business (over 250 staff)
	Legal representative
	Local Government
	Medium business (50 to 250 staff)
	Micro business (up to 9 staff)
	Small business (10 to 49 staff)
	Trade union or staff association
X	Other (please describe) <i>Engineering the Future</i> is an alliance of professional engineering institutions and national organisations that between them represent 450,000 professional engineers and technicians.

Question 1: Are you aware of any instances of the term ‘apprenticeship’ being used to advertise courses other than apprenticeships eligible for Government funding?

Yes/No

Question 2: If ‘yes’, please provide any additional detail of such instances that might be relevant, particularly if it can help to indicate the scale of the issue.

Comments:

Question 3: Are there any unintended consequences that may arise as a result of this proposal?

Yes/No

Question 4: If ‘yes’, please provide details of what unintended consequences there may be?

Comments:

Do you have any other comments that might aid the consultation process as a whole?

Comments:

Although we do not support the proposals, *Engineering the Future* welcomes the government’s commitment to improve and enhance the apprenticeship ‘brand’ while remaining committed to its manifesto promise to create 3 million apprenticeships in this Parliament. Such quantitative obligations can result in plummeting quality, unless specific measures are introduced during delivery.

We do not support the proposals, as we do not believe they will achieve the desired outcome, which is the confidence of both employers and individuals that the apprenticeship programme is an end-to-end, universally uniform quality. As an alliance representing the profession which has arguably protected the ‘gold standard’ for apprenticeship, as well as one of the longest histories of quality delivery, EtF is concerned that protecting the term ‘Apprenticeship’ in the way proposed is not going to ensure the quality which is needed. This is because eligibility for government funding is not the single proxy for quality in apprenticeship provision. We do not support the proposals for the following reasons:

1. There are other, more effective criteria, on which to base restriction of the term ‘Apprenticeship’ than government funding, criteria such as the programme developing competence and moving towards professional registration (or equivalent)
2. To meet the government’s 3m target, adults will need to continue to benefit from apprenticeship participation, but ‘Apprenticeship’ is not a term which appeals to many

3. It is not clear how protecting the terms will work with the proposed levy on employers to support Apprenticeships.
4. The legislation proposed in this consultation may be followed by trademarking of approved English apprenticeships, apprenticeship standards and associated logos, which is completely unnecessary in engineering.

1. The criteria

Government funding is predicated on a system of agreed provider delivery models, eligibility of the individual for funding, summative completion rates, etc. It does not concern itself with the competence of the individual on completion, their employability, or employer satisfaction with the programme.

We believe that all providers of engineering Apprenticeships should work closely with relevant professional engineering institutions (PEIs). Thirty-five PEIs are licensed by the Engineering Council to assess candidates for admission to the Register. The PEIs' expertise and sectoral coverage can drive forward innovation in approved provision and meet the future needs of industry, whilst ensuring that engineering Apprenticeships align with the engineering profession's established and respected standard, the UK Standard for Professional Engineering Competence (UK-SPEC) <http://www.engc.org.uk/standards-guidance/standards/uk-spec/> and the standard for ICT Technicians (ICT Tech) <http://www.engc.org.uk/standards-guidance/standards/icttech-standard/>.

The UK-SPEC standards of competence that are described for Engineering Technician (EngTech) and ICT Technician (ICT-*Tech*) at Level 3 sets out the required standards of competence (knowledge, understanding, skills and values) that registered technicians and must demonstrate. Thus, UK-SPEC, the ICT-*Tech* Standard and the associated registration process provides employers, the public and others with the assurance that an individual's competence has been assessed, their credentials verified and their commitment to continuing professional development established. UK-SPEC was developed, and is kept under periodic review, by the profession, including employers. It has been well received across the sector since it was first published in 2003.

An added benefit to UK business is that the UK standards are globally recognised, thus facilitating the international mobility of engineering professionals and increased global competitiveness for the UK. Developing competence and moving towards professional registration (or equivalent in other sectors), as a required element of an Apprenticeship, would ensure that the Government is maximising public funding to deliver new skills, over and above supporting statutory training and development. This would ensure that Government and employer funding is focussed on progression and achievement.

In response to the Richard Review, the Engineering Council strongly recommended that all providers of engineering Apprenticeships, working with the PEIs, should be required to ensure that engineering Apprenticeships align with the standards in UK-SPEC, and that government funding be linked to engagement with the Professional Engineering Institutions and Engineering Council. If this had been taken forward, EtF would have little issue with the proposals that government funding be the defining factor in protecting the terms as proposed. To date, there are examples of employers working with Professional Engineering Institutions through the Trailblazer initiative, but it is not clear how this proposal works with Trailblazers.

We would welcome support from Government in encouraging all engineering and construction sector apprenticeship providers, employers (particularly SMEs) and employer bodies to engage

with the Engineering Council and PEIs when developing apprenticeships. Requiring such an engagement as a condition of apprenticeship funding should be given consideration.

2. Adults

Protecting the term 'Apprenticeship' will potentially damage apprenticeship take up among those aged 25+. A recent BIS research paper found more than half of those aged 25+ taking part in the programme do not know that they are doing so (Figure 5.1.1, *Apprenticeships Evaluation: Learners*, BIS RESEARCH PAPER NUMBER 2, December 2014). This may be a specific strategy by providers and employers, who are concerned that adults will reject participation in a scheme usually associated with people at the start of their careers. If these individuals are on programmes which genuinely raise their competence to the 'next level', and they are following the same demanding programme as a young person, then the term 'apprentice' is entirely appropriate, but might not be politic.

The engineering profession is very enthusiastic about adult apprenticeship. It enables employers to:

- a) Develop and train existing employees who were recruited in semi-skilled roles for those highly skilled roles where shortages are most critical
- b) Bring adults into engineering technician roles from outside the sector

We do not believe that protecting the term 'Apprenticeship' will change these requirements or increase the supply of suitable adults into the programme.

3. The levy

It is also unclear how these proposals will work with the proposals regarding a levy on large employers – if an apprenticeship is funded via the levy, will it not be an 'Apprenticeship'? While we appreciate that there will be a consultation on the details of this proposal in the autumn, making changes to the overall apprenticeship system at this point seems unnecessary.

4. Trademarking and logos

The engineering profession already has an [appropriate logo](#) for quality apprenticeships.



Apprenticeships that are currently approved by a professional engineering institution and are listed on the Engineering Council's [Database of Technician Qualifications](#) may display the logo, in combination with the statement below.

This apprenticeship is approved by (Insert name of professional engineering institution(s)) on behalf of the Engineering Council as contributing to the requirements for professional

registration as an Engineering Technician (EngTech). Completing an approved apprenticeship alone does not guarantee the award of the professional title EngTech. All potential registrants must undergo a professional review by their chosen professional engineering institution, where their competence and commitment is assessed.

There would therefore be no additional value in creating another 'kitemark' or similar for the engineering profession.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply