

Developing Apprenticeship

Submission to the

Apprenticeship Review Group

27 September 2013

Contents

Contents	2
1. Review of apprenticeship: strategic context.....	3
1.1 The change in education structures	3
1.2 Key factors	4
1.3 Summary of HEA Recommendations	4
2. Apprentice formation	7
2.1 The characteristics of apprentice formation	7
2.2 The apprenticeship pathway	8
2.3 The range and focus of apprenticeship	8
2.4 The status and brand image of apprenticeship	9
3. Identifying the range of occupations suitable for the apprenticeship model.....	10
3.1 Determining occupations and NFQ levels for apprenticeships	10
4. Curriculum development.....	11
4.1 Curriculum Development	11
4.2 Broad functions of the apprenticeship curriculum	11
4.3 Entry standards	12
4.4 Modularity and curriculum structure	12
5. Quality Assurance, Certification and Examination	13
5.1 Certification and examination	13
5.2 Assessment of on-the-job training capacity	13
6. Governance, funding and management	15
6.1 Governance, funding, costs and management structures	15
6.2 Predicting demand and meeting skills requirements	16
6.3 Regional Clustering	16
6.4 Matching State provision to demand	17
7. Legislative change	18
8. Progression through NFQ levels	19
9. Appendix 1: The Apprenticeship Partnership	20

1. Review of apprenticeship: strategic context

- The current review of apprenticeship is welcome and needs to be considered in both a narrow and broad context. In the narrower context, there are evident opportunities to improve the current model of apprenticeship to ensure that it meets the future needs of the labour market, and there are evident weaknesses that need to be addressed. This submission sets out a range of recommendations in this regard.
- In the broader context, there is an ongoing and urgent need to take a strategic perspective on the provision of post secondary education in Ireland, embracing vocational education, further education, and higher education, and to view these as an integral whole. It is necessary also to see the Irish system in the international training landscape and to understand the Irish structure within UNESCO and OECD frameworks.

There is a need to improve provision of continuous education and training within the Irish workforce. OECD data, for example, shows that the Irish workforce, while showing high levels of attainment for younger age cohorts is relatively less well educated among older cohorts. The current high levels of long-term unemployment also present a major challenge as to how unemployed people might be supported in getting back into the workforce.

At a policy and system level, planning is somewhat fragmented and focused on the different elements of the post-secondary education continuum. Too often the different elements are regarded as discrete sectors detached from each other, and targets and goals are often poorly integrated between them. State funding allocations are made through a range of agencies, and risk duplication or incoherence of practice. These relatively narrow perspectives can lead to policies which are not integrated and which do not meet the needs of students, of employers, other stakeholders or of the State. There is now an opportunity to address this system deficiency.

1.1 The change in education structures

The movement of FÁS to the Department of Education & Skills and the establishment of SOLAS are both important system developments that will aid policy and planning in further education – particularly in the light of SOLAS’s policy and planning focus. The establishment of the Education and Training Boards (ETB) and the integration of FÁS and VEC provision within the ETB mandate give further impetus at this time.

The higher education sector is also going through a period of transformation, with major changes in funding practices, aimed at focusing the sector on implementation of national objectives. The current development of a coherent higher education system based around geographic clusters of responsibility and delivery, adds further impetus to the value of taking a strategic perspective embracing vocational, further and higher education.

The Department of Education & Skills now has the overarching role for policy, the greater part of funding and for the regulation of post-secondary education and training. This creates for the Department an opportunity to plan provision across both higher education and further education sectors, including apprenticeship. Such planning should include:

- Setting appropriate policy targets for the entire spectrum of post-secondary education and training to address both student demand and wider economic needs
- Setting appropriate targets for participation levels in different sectors
- Managing funding allocations to ensure that investment is targeted against policy priorities and used in an effective and efficient manner
- Creating and implementing a sustainable funding model.

The Higher Education Authority, herein, makes its observations and recommendations to the Apprenticeship Review Group within the context of developing a broad strategic response to the overarching needs of Irish education and the State.

1.2 Key factors

The HEA believes that development and delivery of an effective apprenticeship training policy will rest on two key factors:

- Employers are best placed to identify occupations, for which the apprenticeship mode is the most effective training method, and to identify the vocational content, the NFQ level and the standards of competencies necessary for such occupations.
- The educational and training sector has the proven professional skill and ability to rapidly develop curricula at all NFQ levels. The sector also has the necessary management structure, technical expertise and quality assurance systems which, when combined with sectoral strategic planning, can provide a stable but agile system of curriculum development and delivery and which ensures that such curricula are fit for purpose.

The HEA therefore proposes that systems should be developed, which create a partnership between employers and the educational sector. These systems should ensure that the employers' lead role of identifying need is integrated with the education sectors' organisational ability to rapidly develop and coordinate curriculum and delivery.

In this document, the HEA commends specific proposals for such a partnership, while recognising that further detail development planning is needed to ensure that the system is designed and operated most effectively and efficiently in a stable long term mode.

1.3 Summary of HEA Recommendations

This section summarises the views of the HEA.

The HEA recommends and believes that:

1. Apprenticeship should be a high profile pathway integrated within the State structure of education and training
2. The identification of occupations, which are appropriate for apprenticeship training, is a matter for employers and the range should be extended as required. The apprenticeship mode is particularly well suited to supporting economic development in a knowledge economy.

3. While recognising employers' key role of identifying the need for any additional apprentice occupations, the HEA is of the view that there is scope to substantially increase the range of apprentice training,, both the number of occupations and the range of NFQ levels at which this mode of training is offered.
4. Awards made on completion of apprenticeship learning can be at any level on the NFQ framework, appropriate to the standards and learning outcomes set for the occupations
5. The standards and NFQ levels necessary to graduate from any apprenticeship occupation should be identified by employers, in consultation with the education providers and QQI, through skills councils, and with the advice of such professional bodies and statutory agencies as have responsibility for determining standards of qualification
6. A small secretariat should be established jointly by SOLAS and the HEA, staffed from each organisation, with specific technical skills to drive liaison and coordination between employers, SOLAS and the HEA and to drive pilot schemes designed to test best practice. The Further Education or the Higher Education providers, in consultation with employers, trade unions, professional bodies and statutory agencies, through regional skills councils, should develop curricula which meet the occupational standards and NFQ levels determined by employers.
7. Where the award is determined to be at NFQ Level 6 Advanced or below, the curricula should be developed by the Further Education State sector or by appropriate private sector providers
8. Where the award is at NFQ Level 6 Higher or above, the curricula should be developed by the Higher Education State sector or by higher education private sector providers
9. The blended mode of delivery, with alternate periods on and off the job, is preferred to ensure effective learning and achievement of job competence
10. Off-the-Job training and education is desirable to consolidate learning, ensure learner reflection and introduction to the community of practice through peer interaction
11. All apprentice curricula should include generic transferable skills and competencies¹
12. Electronic distant education should form part of provision
13. Entry standards for any occupation should be set at such a level that the applicant is likely to succeed in achieving the award sought.
14. There should be no age or gender limits to entry
15. All apprentice occupations and curricula should prepare learners for progression through the NFQ levels.

¹ Generic Transferable Skills are general education competences. The type of skills, from which a selection might be made, are; mathematical skills, ICT skills, communication skills, literacy, business understanding, entrepreneurship etc. Apart from their intrinsic value, they form a basis for continued lifelong learning and for upward progression on the NFQ.

16. Individual occupations should be grouped in families of cognate knowledge, skills and competences. Occupational curricula should be developed using common core family modules and occupational specialisation should be provided by mandatory modules appropriate to the occupational speciality.
17. Certification of attainment of the occupational standard should take place at the end of the apprenticeship and should include practical elements, which should take place in a workplace, and theoretical elements. Examiners should include both employers and off-the-job providers.
18. Employers proposing to recruit apprentices should be assessed on their capacity to provide training in the curriculum, before being registered as a training employer. Training consortia are desirable, where necessary to ensure curriculum coverage.
19. On-the-job training abroad should be acceptable, where appropriate, to ensure language and international competitiveness skills, and to increase training opportunities
20. The conformance of the training employer with the curriculum should be assessed during the training period
21. The total numbers of recruits authorised for any occupation in any year should be determined by economic and employment forecasts agreed between employers, off-the-job providers and forecasting agencies. These numbers should be reviewed on a rolling five year annual basis. Recruitment should be limited to those numbers.
22. Governance and funding should follow the NFQ level of curricula. Where curricula are at the Higher Education level, governance and management should be by the Higher Education sector and funding should be through the HEA. Where curricula are at the Further Education level, governance and management should be by the Further Education sector and funding should be through the SOLAS.
23. Balanced regional labour market development should be promoted by organising training provision on a regional basis, where volume of demand makes that possible. The National Strategy for Higher Education already provides for regional clusters in higher education. These clusters could have a wide range of functions, with initial priorities set for shared academic planning and student pathways. These clusters could provide the basis for regional planning in respect of apprenticeship, acting as regional skills councils
24. The Institutes and the ETBs should take responsibility for interaction with employers for apprentice programmes within their ambit.
25. Legislative changes may be required to realise the recommendations of the Review. This legislation should be drafted so as to enable and facilitate establishment of an apprenticeship system which is future proofed against national and international developments and should have inherent flexibility to respond to emerging and unforeseen economic and labour market developments.

2. Apprentice formation

The Higher Education Authority (HEA) believes that:

State education and training policy forms an integrated whole embracing all levels and all providers, including employers and that this policy should provide integrated pathways to:

- Facilitate and enable citizens to develop to the maximum of their potential, and minimise barriers and cul-de-sacs
- Ensure the availability of a workforce with the knowledge, skills and competence to enable economic development and competitiveness in a world economy.

Apprenticeship formation is an essential component of overall education and training policy of the State and should be developed further. It is one mode of training within overall vocational education and training (VET) and within initial vocational education and training (IVET) pathways.

The apprenticeship mode of training should form one pathway from second-level education to professional competent work and onwards to higher levels of education for those who wish.

The importance of Vocational Education and Training (VET) is being increasingly recognised internationally. The European Union has given a major impetus to development of VET in the EU through the Copenhagen Declaration, and through related declarations and subsequent actions.² The G20 Labour and Employment Ministers' Declaration (in Moscow on 18-19 July 2013³) encourages vocational training institutions and apprenticeship systems to anticipate economic/sectoral changes and to contribute to a successful matching of skills and qualifications with current and future job requirements.

The World Bank has developed new frameworks for the assessment of overarching human capital strategies.⁴ It is essential that Ireland develop its apprenticeship system or the State will lag international developments and competitiveness.

Major change is required in the operation of the apprenticeship system if it is to serve the future needs of the economy and of learners. The current Irish apprenticeship model, designed for the economic environment of the late 20th century, is not best suited to future globalised market economies nor suited to future State economic development objectives.

2.1 The characteristics of apprentice formation

The HEA believes that:

The apprenticeship mode must have strong characteristics and an identity that distinguish it from other work-based pathways of learning and from other

² http://ec.europa.eu/education/pdf/doc125_en.pdf

³ www.g20.org/load/781649316

⁴ <http://web.worldbank.org/WBSITE/EXTERNAL/TOPICS/EXTEDUCATION/0,,contentMDK:23191129~pagePK:148956~piPK:216618~theSitePK:282386,00.html>

programmes in which students are placed in work situations. The following principles are essential to that identity:

- a) Apprenticeship is work based learning.
- b) The apprentice is an employee during the course of his/her apprentice formation.
- c) Apprenticeship training is substantial in depth and duration, while employed in a real job. For a programme to be classified as an apprenticeship; it must have a duration of no less than two years
- d) Graduates of apprenticeship programmes are qualified to work autonomously in a competent, professional and independent capacity in their selected field.
- e) The learning should be a blended combination of on-the-job employer-based training and off-the-job training

These characteristics are common to apprenticeship programmes in Germany, Austria, Switzerland and most EU countries where apprentices are employees; they are also consonant with the recommendations of the Richard Review of Apprenticeships in England (December 2012)⁵.

2.2 The apprenticeship pathway

The HEA believes that:

- a) Apprenticeship should provide a foundation for lifelong continued professional development and learning.
- b) Apprenticeship is a mode of training and should be available at any NFQ level, where needed. A number of factors will inevitably lead to an increase in the range of higher level occupations. These include the pressure of market globalisation, increasing international competitiveness and the need to develop a knowledge-based economy. The National Reform Programme target of increasing the share of 30 to 34-year-olds, who have completed tertiary or equivalent education to at least 60 per cent., will inevitably increase the range of higher level occupations. Where appropriate, the apprenticeship mode of training should be developed as an efficient and effective means of increasing the stock of tertiary graduates for some occupations.
- c) The apprenticeship pathway should be a stable and visible option available to learners, and should have full visibility and clear meaning to the public and employers. It should have a brand image that carries an immediate understanding among stakeholders and that confers a status on apprenticeship different but equal to further education and to higher education

2.3 The range and focus of apprenticeship

The HEA believes that:

- a) The NFQ level of any apprenticeship award should be determined solely by the standards and the learning outcomes specified for the programme.

⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/34708/richard-review-full.pdf

Therefore the apprenticeship mode of training could be used for any occupation at whatever NFQ level is appropriate to the occupation.

- b) The range of apprentice occupations should be broadened, both in types of occupation and in NFQ levels, to meet employers' needs for a competent flexible and trained staff if apprenticeship is the most effective method of achieving this.

2.4 The status and brand image of apprenticeship

The HEA believes that:

- a) Apprenticeship formation should be promoted as an established high-status mode of training within the continuum of State education and training.
- b) Apprenticeship occupations should have a clear brand image, with clear public recognition of the well-defined occupational role and status of any apprenticeship occupation.
- c) Long-term persistent promotion campaigns should be undertaken to embed knowledge of the apprenticeship pathway among guidance staff, employment support systems, employers, employees, parents and students.

3. Identifying the range of occupations suitable for the apprenticeship model

There is international consensus that apprenticeship formation should serve key national policy objectives. Apprenticeship should develop the knowledge, skills and competence necessary to satisfy employers' requirements for a trained labour market workforce.

There is also consensus internationally that graduates of apprentice programmes should be adaptable to rapidly changing business and technological environments in a globally competitive economy.

3.1 Determining occupations and NFQ levels for apprenticeships

The range of professional occupations that are suited to apprenticeship formation and the volume of recruitment projected for particular programmes should be determined by the current and future needs of economic sectors. To this end the HEA recommends that:

- a) The tasks of identifying future apprenticeship occupations, of identifying the NFQ levels at which they should be designed, and the occupational standards for the occupation should be carried out by employer-led bodies in consultation with the education providers (in effect Skills Councils). In so doing, the advice of such professional bodies and statutory agencies, as have responsibility for determining standards of qualification and human capital requirements, should be considered.
- b) The State, through its agencies, should support this employer led process. A small technically competent secretariat should be established jointly by SOLAS and the HEA, staffed from each organisation, to drive liaison and coordination between employers, SOLAS and the HEA and to drive pilot schemes designed to test best practice. (This may require some additional resource allocation to SOLAS and HEA).
- c) Future sectoral or cross-sectoral labour market requirements should be analysed to ensure that the range of apprentice-mode occupations relates closely to future strategic needs for the sector.
- d) Analysis should include consideration of other training and education pathways and should include cost benefit analysis of whether an apprenticeship mode is the most efficient and effective pathway to satisfying the labour market demand.
- e) An early guidance by the Qualifications and Quality Authority of Ireland (QQI) should be used to determine whether the award for any proposed occupation would likely be at a higher education level (NFQ Level 6 Higher or above) or at a Further Education level (NFQ Level 6 advanced or lower).

See Appendix 1 for a diagram representing the proposed system.

4. Curriculum development

4.1 Curriculum Development

Following agreement on the need for a future occupation, curriculum development can commence.

- a) The direct involvement of employers must be a normal part of the curriculum development process, in the HE and FE sectors. This involvement should include consultation by both representation and by survey during the curriculum development process. The curriculum should be holistic, and include both on and off the job training phases.
- b) Development of occupational curricula at the further education level should be coordinated by the further education sector.
- c) Development of occupational curricula at the higher education level should be coordinated by the higher education sector
- d) Generic transferable skills (for example in mathematics, communication skills or ICT etc) should be a necessary and certifiable part of the curricula, with the particular mix determined by the occupation and needs of learners. These modules should be at a level appropriate to the NFQ level of the occupational programme.

4.2 Broad functions of the apprenticeship curriculum

- a) Each occupational apprentice curriculum should fulfil four broad functions.
 - Development of occupational transferrable skills and competencies in accordance with sectoral employers' needs⁶
 - Acquisition of generic transferable skills in key fields⁷
 - Preparation for lifelong and continued professional development
 - Facilitate the personal development and socialisation of school leavers entering the culture of work and employment.
- b) The award, on successful completion of the programme, should be at an NFQ level appropriate to the standard of knowledge, skill and competence identified by employers to be necessary for the occupation.
- c) The award should be accepted by the community of practice in the chosen field as qualifying the graduate for autonomous professional employment within the occupational grouping

⁶ Occupational Transferrable Skills are knowledge, skill and competences directly relevant to the occupation and community-of-practice and which are transferrable between employers in the sector.

⁷ Generic Transferable Skills are general education competences. Examples of key fields are; mathematical skills, ICT skills, communication skills, literacy, business understanding, entrepreneurship etc. Apart from their intrinsic value, they form a basis for continued lifelong learning and for upward progression on the NFQ.

4.3 Entry standards

- a) Entry standards should be set for individual apprenticeship programmes, at a level likely to support successful completion of the programme.
- b) Pathways into apprenticeship should be established or retained for early school leavers or those unsuited to the Leaving Certificate programme if the minimum entry standard to any occupation is higher than Junior Certificate or its equivalent.
- c) Entry with advanced standing, or exemption from certain modules, should be possible for entrants with levels of knowledge, skill and competencies that exceed the minimum entry standard.
- d) Entry should be available to persons of all ages and genders

4.4 Modularity and curriculum structure

- a) Curricula should be of modular construction
- b) Individual occupations should be grouped in families, with common core modular curricula used across the family.
- c) Specialisation into individual occupations within the family should be facilitated by additional specialised modules, which focus on particular occupational requirements. These specialised modules would also facilitate career change, in later life, from cognate occupations
- d) The duration of any occupational curriculum should be a function of the time required to achieve the specified occupational standard and will vary from occupation to occupation.
- e) The core principle of a blended learning structure should be the basis for each occupational curriculum, with both on-the-job and, off-the-job elements.
- f) Where feasible, electronic distance learning should be developed for segments of the curriculum, in particular to enable continued theory learning during the on-the-job phases

5. Quality Assurance, Certification and Examination

5.1 Certification and examination

The institutes of technology and universities have long established quality assurance and examination processes approved by QQI. These processes should apply to apprenticeships developed and provided within the higher education sector.

QQI (FETAC) has developed quality assurance and assessment processes for the further education sector, (specifically for PLC programmes and for apprenticeship programmes). These processes should be used or further developed to assure quality on apprentice programmes developed and provided by the further education sector.

- a) Certification that individuals have reached the occupational standard should be established on completion of the programme by a qualifying examination that includes both practical applied elements and theoretical elements.
- b) If possible, the practical examination should take place in the employer's workplace, or if this is not suitable in another suitable venue. The duration of the qualifying examination should be determined by the range of competencies and skills being examined. For practical trades, the current National Apprenticeship competition, the World Skills Olympics and the FÁS Competency Determination Mechanism demonstrate the type of practical examination that might be used.
- c) The examiners for both theoretical and practical examinations should include both an employer representative and an educational representative, but be independent of the particular apprentice's employer. This is in line with continental European practice and institute of technology extern examiner practice. To this end, panels of appropriate examiners should be established and maintained.

5.2 Assessment of on-the-job training capacity

The employer trains the apprentice for the greater part of the apprenticeship. It is essential that this training is in accordance with the curriculum requirements to ensure trust, in the validity of the qualification, by the community of practice. In the past, there has been criticism that, in some instances, some employers were unable to fulfil this requirement mainly because:

- The employer might not carry out the range of work necessary for the full curriculum.
- The employer might not have personnel with the appropriate training skills to train and certify the achievement of the apprentice.

It is crucial, to the status of the apprenticeship award, that any deficiencies on either the employer or educational provider sides be avoided. The following steps are proposed to ensure the curriculum set by the sector is followed during the on-the-job elements:

- a) Employers should require approval to register as a trainer of apprentices. Such approval should require renewal at regular intervals.
- b) The ability of individual employers or groups of employers to provide on-the-job curriculum training should be assessed when the employers seek registration as an approved trainer(s).
- c) This assessment should include evaluating the suitability of the persons responsible for apprentices' direct training and supervision and should include the extent to which the range of activities of the employer covers those required by the curriculum.
- d) If an individual employer has a limited range of work, formal consortia of employers, may propose to train apprentices, rotating the apprentice between employers, so as to ensure coverage of the curriculum
- e) On-the-job training abroad should be acceptable, where appropriate, to ensure language and international competitiveness skills, and to increase training opportunities. Such arrangements might particularly benefit multinational employers or exporting businesses
- f) During the apprenticeship, checks should take place on the conformance of the employer to the curriculum training obligation.
- g) The assessment of employers' training capacity, both initial and on-going, should be carried out by industry practitioners independent of the employer or group of employers. To this end appropriate panels of assessors should be established and maintained to ensure training, continuity and consistency

6. Governance, funding and management

In meeting the challenges of a competitive high technology and high-level services economy, a significant number of apprenticeship programmes are likely to be developed and delivered in the higher education sector, particularly in areas where the apprenticeship mode offers the most effective pathway for an occupation.

The expertise of higher education to rapidly develop programmes relevant to employers' needs and their experience in working with employers on programmes with extensive student placement is well established. If this existing higher education expertise is married with specific arrangements for employer oversight of standards and content of apprentice formation, then the relevance and effectiveness of higher education apprentice modes of learning can be ensured.

The HEA recommends that new governance arrangements are put in place so that responsibility is more clearly focussed based on the NFQ level of each apprentice programme.

The beneficiaries of apprenticeship training are employers through increased skill and productivity, apprentices through career acquisition and the State through the common good. Therefore the costs of apprenticeship training should be shared between employers, apprentices and the State.

6.1 Governance, funding, costs and management structures

- a) It is recommended that governance and funding of the apprenticeship system should follow the NFQ level of occupations.
- b) Where an occupation curriculum is at higher education NFQ levels, then governance and funding should be through the Higher Education Authority and the programme should be managed by the higher education sector.
- c) Where an occupation curriculum is at further education NFQ levels, then governance and funding should be through SOLAS and the programme should be managed by the Education and Training Boards sector.
- d) The costs of apprenticeship training need to be reviewed. By international standards and by comparison with higher education costs, apprentice training costs are high and need to be reduced. A review of costs should include all aspects of training, including teaching arrangements, as well as supports for employers and apprentices in training
- e) The costs of apprentice training should be shared between employers, apprentices and the State
- f) Because apprenticeship occupations fulfil the requirements of employers for a competent labour force, funding for such programmes should be provided from the National Training Fund and channelled through the normal Higher Education Authority funding model, for higher education apprenticeships and through SOLAS for further education apprenticeships. See Table 6.1 below.

Table 6.1	Governance / funding	Management
Apprenticeship programmes with certification up to NFQ level 6 advanced	SOLAS	Education and training boards
Apprenticeship programmes with certification to NFQ level 6 Higher and above	HEA (National Training Fund)	Higher education institutions

Table 6.1 Proposed Governance / funding and management of apprenticeship programmes

- f) Currently the State provides incentives by paying an allowance to apprentices while they are attending off-the-job training, and the State covers the full cost of IoT and CFE training, as a direct contribution to apprentice employees.
- g) The contribution that the State makes to apprentice training (both through allowances and through State provision costs) should be made more explicit to employers and to the wider public.

6.2 Predicting demand and meeting skills requirements

- a) A five-year projection of demand should be forecast for each occupation, in consultation with employers, the Expert Group on Future Skills Needs (EGFSN), the SOLAS Skills and Labour Market Research Unit (SLMRU) and the off-the-job providers. These five-year forecasts should be made annually.
- b) Institutes of Technology and ETBs should examine the needs identified by employers and propose appropriate provision to the HEA or SOLAS to fulfil those on a regional basis, (as described below).
- c) If, in exceptional circumstances, it became evident that inadequate provision for specific occupations was likely to arise, SOLAS or the HEA should then seek to arrange provision for anticipated demand, using their normal governance structures. The SOLAS and HEA should periodically review whether the volume of training being provided within their respective jurisdictions meets the current and projected demand.

6.3 Regional Clustering

To ensure balanced national development and to minimise costs to employers and learners, provision of off-the-job training should be organised on a regional basis, where the volume of demand makes that possible.

- a) It is proposed that these cluster regions would be the same regions as those of higher education re-organisation.
- b) To ensure coordination and efficiency, ETBs and institutes of technology in those regions should form clusters for consultation and for coordination between State providers and the regions' employers. Effectively these clusters should act as

Regional Skills Councils. (It should be noted that this structure fits well with the HEA's plan for regional clusters in education and with Government's wider plans for better integration of the public service. They will also promote a more integrated relationship between regional ETBs and IoTs generally).

- c) The institutes should take responsibility for interaction with employers, scheduling, consultation and placement of redundant apprentices for programmes that are within their functional area. Likewise the ETBs should perform similar functions for their programmes.

6.4 Matching State provision to demand

In the current system, employers initiate recruitment of apprentices without reference to the capacity of the State to deliver subsequent off-the-job components. Currently no limits are set to the numbers recruited in any period by employers. This has resulted in substantial delays for apprentice progression in the boom years, followed by substantial training-place oversupply when demand collapsed.

These problems are exacerbated because the current inflexible contractual HR systems militate against rapid response. As the National Strategy for Higher Education (2011) noted, there is a need for greater flexibility, adaptability and mobility of education staff to meet new demands from structural and other changes⁸. This labour inflexibility must be addressed as a matter of urgency – and not just in relation to apprenticeship programmes, but to enhance the performance of the system more generally.

For the future it is essential that there is better and more stable matching between demand for apprenticeships and State provision. The following measures could help achieve this:

- a) Annual consultation with employers, combined with economic based forecasting, should be used to agree recruitment targets for each sector on a rolling five year basis.
- b) Annual recruitment should be limited to those targets agreed with employers by restricting permission for recruitment to those limits.
- c) If an urgent demand arises, which is likely to exceed the planned targets; this should be provided by the private sector on a contractual basis funded by employers or through recruitment from the open EU labour market.
- d) Consideration should be given to a 'safety net' system whereby the public service could increase its intake of apprentices in times of low private sector recruitment and decrease its intake as private sector recruitment expands.
- e) Experience has shown that as recruitment to certain occupations decline, very small numbers may be recruited as demand tails off. This makes provision for the remainder totally unviable. Systems need to be established, which ensure recruitment only takes place in batches and can only proceed when an economic batch size is reached. The use of modular curricula might enable apprentices to be redirected to fields with higher demand, but modular curricula will not eliminate this low volume problem.

⁸ National Strategy for Higher Education to 2030 (2011) Pg 118

7. Legislative change

The HEA believes that legislation will need to be enacted as part of the reform of the apprenticeship model.

This legislation should be drafted so as to enable and facilitate establishment of an apprenticeship formation system which is future proofed against national and international developments.

The legislation should have the flexibility to respond to emerging or unforeseen economic developments, and enable and facilitate the establishment of a resilient apprenticeship formation system.

The legislation should be based on key principles, rather than prescriptive regulation, that can support and ensure flexible and rapid response to labour market developments and allow the governance systems to respond to labour market trends and overall national education and training policy.

The HEA would wish to advise on appropriate legislation when the extent and direction of the Review recommendations become more clear.

8. Progression through NFQ levels

All apprentice occupations and curricula should prepare learners for lifelong learning and for progression through the NFQ levels.

- a) The higher education institutes should ensure that adequate, transparent and facilitative progression and transfer portals exist between apprenticeship and higher education.
- b) These portals should be publicised permanently as part of the apprenticeship prospectuses, as part of higher education prospectuses and through guidance counsellors.
- c) Entry to any higher education programme should be at a level commensurate with mapping of apprentice learning outcomes onto the receiving course. Entry with advanced standing and exemptions should be a normal and explicit component of the transfer arrangements
- d) In addition to facilitating entry to existing higher education programmes, the higher education sector should develop specific programmes aimed at graduate apprentices, similar to the Meister qualifications available in Germany. These programmes should provide increased professional competence to craftspersons in their chosen field and optionally provide training in management, business and entrepreneurial skills to enable the craftsperson to manage, or establish enterprises, or departments of enterprises.

9. Appendix 1: The Apprenticeship Partnership



