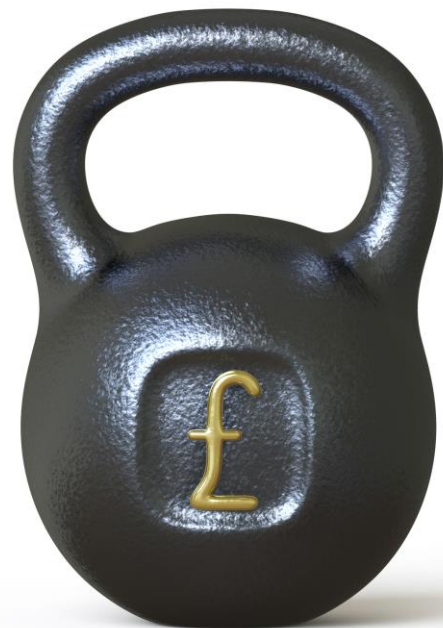


No train, no gain

**An investigation into the quality of
apprenticeships in England**

Tom Richmond and Eleanor Regan



About the authors

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Executive Summary

10 years ago, the Coalition Government commissioned the ‘Richard Review’ to ensure that apprenticeships in England were “consistently delivering high quality training”. The Review called for a package of reforms that aimed to deliver a “world class” system, which centred around a new ‘employer-led’ approach that has allowed employers to control the design and provision of apprenticeships over the past decade. This report investigates what has happened to the quality of apprenticeships after ministers and civil servants sought to implement the Review’s proposals.

Low skill roles being rebadged as ‘apprenticeships’

The Richard Review was clear that apprenticeships were “most meaningful” for jobs requiring “substantial training and high levels of skill” and that “other forms of training” should be used to support individuals into lower-skilled jobs. A decade on, the apprenticeship system is still littered with low skill roles masquerading as ‘apprenticeships’ even though they clearly do not require ‘substantial training’ (despite this level of training being a mandatory element of all apprenticeships according to the Government).

Numerous job adverts on the Government’s own apprenticeship vacancy website (see pages 21-26) lay bare the low expectations of many ‘apprenticeships’. In the hospitality sector, learners can end up heating and serving precooked meals and pushing around a drinks and snacks trolley as a ‘Food and Drink Apprentice’, or washing, drying and ironing clothes as an ‘Apprentice Housekeeper’. Other low skill ‘apprenticeships’ can be found in offices who hire apprentices to answer phone calls and take messages for colleagues as well as leisure venues who recruit apprentices to greet customers, take bookings and serve soft drinks. None of these roles represent skilled occupations (another mandatory part of the Government’s definition of an apprenticeship) and they typically offer just £4.81 per hour - the apprenticeship minimum wage - in return for a poor experience.

To emphasise how little skill these ‘apprenticeships’ require, employers often admit that these jobs can be performed with minimal training. ‘Retail apprenticeships’ have proved popular in many supermarkets and other outlets, even though employers state the same skills can be taught in just six weeks outside of the apprenticeship system. This absence of substantial and skilled training is equally evident in the ‘apprenticeships’ for driving delivery vans, working in a coffee shop and dog grooming among other roles, which typically require no more than a few weeks of training – thus confirming that a 12-month ‘apprenticeship’ is wasteful and misleading for potential recruits.

The misuse of the apprenticeship brand

The Richard Review criticised the use of apprenticeships to upskill existing staff or accredit their existing skills, calling it “the wrong approach to training and... distracting apprenticeships from their core purpose”. Nevertheless, the Review’s recommendation that such activities “should remain clearly distinct” from apprenticeships has not been implemented. Over 40 per cent of ‘apprentices’ in 2020/21 had been with their employer for over a year prior to starting their apprenticeship.

The Review also warned that using apprenticeships to upskill staff would represent poor value for money. Even so, by far the most popular ‘apprenticeship’ in England is a training course to become a ‘Team Leader’, which has attracted around 90,000 learners over the last five years – almost 70 per cent more than any other apprenticeship. Employers can access £4,500 for each employee enrolled on this course, despite a similar programme being available outside of the apprenticeship system for just £1,300.

In addition, the Richard Review objected to the “drift towards calling many things apprenticeships which, in fact, are not”, adding that apprenticeships must be used for “real and specific skilled occupations”. However, many current ‘apprenticeships’ have nothing to do with real occupations, with some employers choosing instead to invent fake job titles to access apprenticeship funding. This includes training courses called ‘Senior Leader’ and ‘Accountancy or Taxation Professional’, with the latter absurdly claiming to encompass roles as diverse as accountants, tax advisers, auditors, management consultants and business advisors in a single ‘apprenticeship’. Such courses are not recognised jobs or occupations (yet another breach of the Government’s definition of an apprenticeship) and are hugely expensive, with the ‘Accountancy or Taxation Professional’ consuming more funding than any other apprenticeship over the last five years at a cost of up to £21,000 per ‘apprentice’.

Apprentices denied the training they are entitled to receive

The Richard Review emphasised that off-the-job training “adds value” to the experience of apprentices by giving them “safeguarded time away from their job to ensure they can do substantial training”. Since the Review, apprentices have been entitled to a minimum of 20 per cent of their working hours to be spent on off-the-job training activities – equivalent to one day a week. Even so, one in five apprentices are not informed about this entitlement, with even lower awareness among hospitality and retail apprentices as well as entry-level apprenticeships more broadly. Worse still, more than half (54 per cent) of apprentices do not receive the minimum one-day-a-week of off-the-job training, and 30 per cent report receiving no training at all from their training provider during the entire working week.

Even where off-the-job training is being delivered, it is often poor quality. The Richard Review had criticised training providers for “too often” restricting off-the-job training to “self-guided learning” by apprentices, yet little has been done since then to eradicate this problem. Under the current apprenticeship funding rules, training providers are allowed to count the “time spent [by apprentices] writing assignments” (including homework tasks) as ‘training’ – an appalling distortion of what an apprenticeship is meant to entail, and an obvious loophole for unscrupulous providers to spend as little time and money as possible delivering genuine training while claiming the maximum available funding from government.

What’s more, the current funding rules place no restrictions on the amount of ‘online learning’ that can take place, meaning that apprentices can go weeks, if not months, without having any face-to-face contact with their training provider or receiving any direct training. Even ‘degree apprenticeships’ are being delivered by some Higher Education providers entirely through webinars, recorded lectures and online forums, with barely any face-to-face contact throughout the entire multi-year course. Apprentices are rarely made aware of such practices by their training provider before their apprenticeship commences.

Employers ignoring their responsibilities

On-the-job training delivered by employers is a crucial component of apprenticeships, especially as 80 per cent of an apprentice’s time is supposed to be spent in the workplace. The Richard Review heard from apprentices that on-the-job training improved their overall experience as they valued the “on-site application to achieve and embed” their off-the-job learning, alongside “work-based time to build experience” and having someone mentor them. Despite the value of this type of training, one in five (19 per cent) apprentices report receiving no on-the-job training at all from their employer, rising to one in four (26 per cent) for those on entry-level apprenticeships.

What’s more, the Richard Review emphasised the importance of creating a “clear and common understanding of what is expected from the apprentice and the employer from the outset”, yet employers and training providers are not required to provide apprentices with a curriculum or syllabus setting out what they will actually learn on their course. This means that prospective apprentices are left to make decisions about their future with barely any knowledge of what they are signing up to – something that would never be tolerated for university or A-level applicants. Denying apprentices access to detailed information about their training course also leaves them at risk of a poor-quality experience because they have no reference point for what training they should receive on their apprenticeship. The continued absence of a ‘clear and common understanding’ of what apprentices should learn is so pervasive that one in ten learners are unaware that they are even on an apprenticeship.

The experience of apprentices with their employers also varies significantly across sectors. While the Richard Review was clear that apprenticeships are “a form of education, based in the workplace”, many apprentices are being denied the core education element of their programme. This is particularly common in social care and retail, where apprentices are often treated as “workers rather than learners” and are given few opportunities to learn new skills during working hours. A lack of high-quality training from employers has been linked with low satisfaction levels among apprentices as well as an increased chance of them dropping out of their apprenticeship, with some apprentices leaving precisely because their employer “prioritised their employee role over their apprenticeship requirements”. The OECD has highlighted that England remains an international outlier by acting as if on-the-job training is a “marginal” issue despite it representing “the traditional heart of apprenticeship”.

Conclusion

The Richard Review set out to ensure that apprenticeships in England consistently delivered high-quality training. A decade on, the evidence in this report shows that many apprentices are still being badly let down by the current system. From the outset, applicants are kept in the dark with little information about what an apprenticeship will offer them. Even after their apprenticeship begins, learners can find themselves working in low-skill low-level positions while being paid far less than the national minimum wage. At the same time, employers have taken advantage of the opportunity to create ‘apprenticeships’ out of fictitious job titles, which typically turn out to be little more than training courses for their existing employees. Regardless of which apprenticeship they have signed up to, apprentices across the country are also not receiving the necessary training from their employer or training provider, with many left largely to their own devices and receive no training at all.

In light of these uncomfortable truths, it is perhaps unsurprising that almost half (47 per cent) of all apprentices are now dropping out before completing their course. A staggering 70 per cent of those who drop out report concerns about the quality of their apprenticeship – equivalent to around 115,000 apprentices a year. These concerns include, among others, their apprenticeship being low quality, badly organised, unhelpful or lacking the rigorous training that they rightly expected. If A-level or university students were dropping out in such large numbers or reporting similar complaints then it would be a national scandal. On that basis, there is no justification for tens of thousands of apprentices having to tolerate such a disheartening experience.

While there are many excellent apprenticeships available, this report has no choice but to conclude that the quality of apprenticeships in England remains a serious problem. While an ‘employer-led’ approach to apprenticeships was a valid aim, the evidence strongly suggests

that many employers are either unable or unwilling to offer apprentices a high-quality experience. Meanwhile, some training providers continue to make the most of the weak rules around training quality and the noticeable lack of enforcement from government. As a result, the majority of apprentices are being denied even their minimum entitlement to a decent training programme – a clear breach of the funding rules that apparently comes with few consequences for the training provider.

The only way to eradicate poor provision and substandard training within the apprenticeship system is for the Government to now set a much higher bar for what constitutes ‘quality’ as well as consistently enforcing the rules and procedures that were intended to protect apprentices from malpractice and exploitation. In other words, our apprenticeship system should be reconfigured so that it puts the needs of apprentices alongside the needs of employers. If this change in culture and mindset does not materialise in the coming years, apprenticeships will continue to be “considered second class” and lack the prestige tied to attending university - as the Richard Review warned ten years ago. The recommendations in this report set out how policymakers can start a new journey towards building a high-quality apprenticeship system that is as respected and admired as a university degree. The reforms needed to reach this goal cannot come soon enough.

Recommendations

Creating a better experience for apprentices

- **RECOMMENDATION 1:** The Government should publicly restate its commitment to the Richard Review’s definition of what constitutes a high-quality apprenticeship that benefits learners as well as employers. Any ‘apprenticeship’ that does not meet this definition should be immediately banned from accepting new apprenticeship starts and fully withdrawn by 2024.
- **RECOMMENDATION 2:** To create a common and transparent understanding of the training programme that apprentices will receive, employers should be required to produce a ‘training curriculum’ for each apprenticeship standard from 2024 onwards. The curriculum (designed in collaboration with Awarding Organisations and training providers) will set out a complete list of the content, tasks and activities that will be delivered to learners over the course of their apprenticeship.

- **RECOMMENDATION 3:** To ensure that all apprenticeships are for skilled occupations and roles that require at least 12 months of training (as specified in the existing funding rules), every new training curriculum must include a minimum of 300 hours of off-the-job training in every year of the apprenticeship.
- **RECOMMENDATION 4:** To prevent any employer or provider from ignoring their responsibilities to offer genuine training to every apprentice, a minimum of 200 hours out of the new 300-hour annual training curriculum must be delivered face-to-face. Any time spent by an apprentice completing homework or other assignments will also no longer be counted as 'training'.

Creating a better system for delivering apprenticeships

- **RECOMMENDATION 5:** To build an apprenticeship system that benefits learners, taxpayers and wider society as well as employers, the Institute for Apprenticeships and Technical Education (IfATE) should be redesigned as a collaborative partnership that is guided by the views of its main stakeholders and beneficiaries.
- **RECOMMENDATION 6:** As part of a new drive to improve the quality of off-the-job and on-the-job training, the Government should hand responsibility for approving and inspecting apprenticeship providers to a new body: the National Apprenticeship Inspectorate.
- **RECOMMENDATION 7:** To promote the supply of entry-level opportunities and clear progression routes into genuine high-quality apprenticeships, the 'traineeships' programme should be expanded. A bursary of £100 a week should also be introduced for trainees to support them with expenses such as food and transport.

1. Introduction

“Apprenticeships, or at least the notion of them, are popular. This is a good thing and a bad thing. It is good because there is broad support amongst all stakeholders for a strong apprenticeship system in our country. At the same time, with that warm regard and that popularity, comes a diversity of views on what an apprenticeship is and, more importantly, what it should be going forward. This plurality of views in itself is no bad thing but it has led us to stretch the definition of what an apprenticeship is too far and, as a consequence, we risk losing sight of the core feature of what makes apprenticeships work, what makes them unique.”¹

In 2012, the Coalition Government set entrepreneur Doug Richard the task of leading a wide-ranging review of apprenticeships in England (the ‘Richard Review’). The Review was asked to “ensure that in the future the programme is... consistently delivering high quality training” as well as taking a “critical look at apprenticeships and look to identify a set of principles and priorities for the optimal content of future apprenticeships, to ensure that every apprenticeship delivers new high quality training”.²

As the above quote from the Richard Review rightly notes, apprenticeships are a unique form of training as they offer individuals the opportunity to ‘earn and learn’ in employment while they work towards a nationally recognised credential. Consequently, when done well, apprenticeships deliver benefits to individuals, their employer and society as a whole. The Review stated that “at its heart an apprenticeship is a form of education... which implies a key beneficiary is the apprentice”,³ yet employers also benefit because ‘apprenticed’ employees are “more loyal and more effective”.⁴ In addition, society benefits as apprenticeships provide “a ladder into meaningful employment”, improve the quality of the workforce and provide “a critical tool for Government to fulfil its obligation to young people to prepare them for a lifetime of employment.”⁵

To deliver these benefits, the Richard Review proposed several reforms to the apprenticeship system that were “intended to help shape a system that has the potential to be world class whilst being tuned to this country’s specific economy.”⁶ The proposed reforms included:

- A switch from apprenticeship ‘frameworks’ (packages of learning delivered as separate qualifications) to ‘standards’ written by employers, which would set out “in terms relevant and meaningful for employers, what an apprentice should be able to do and know at the end of their apprenticeship.”⁷ The content of these new standards was to be developed by groups of employers (‘Trailblazers’).

- Moving to a final test “primarily at the end of an apprenticeship”⁸ (hence the name ‘end-point assessment’) that would demonstrate “the apprentice can take the knowledge and expertise they have gained and apply it in a real world context”.⁹
- The creation of a new funding mechanism, in which “purchasing power for investing in apprenticeship training should lie with the employer.”¹⁰ The Review proposed that for employers to be real consumers of training, they should “have control of Government funding and, also, contribute themselves to the cost of training.”¹¹

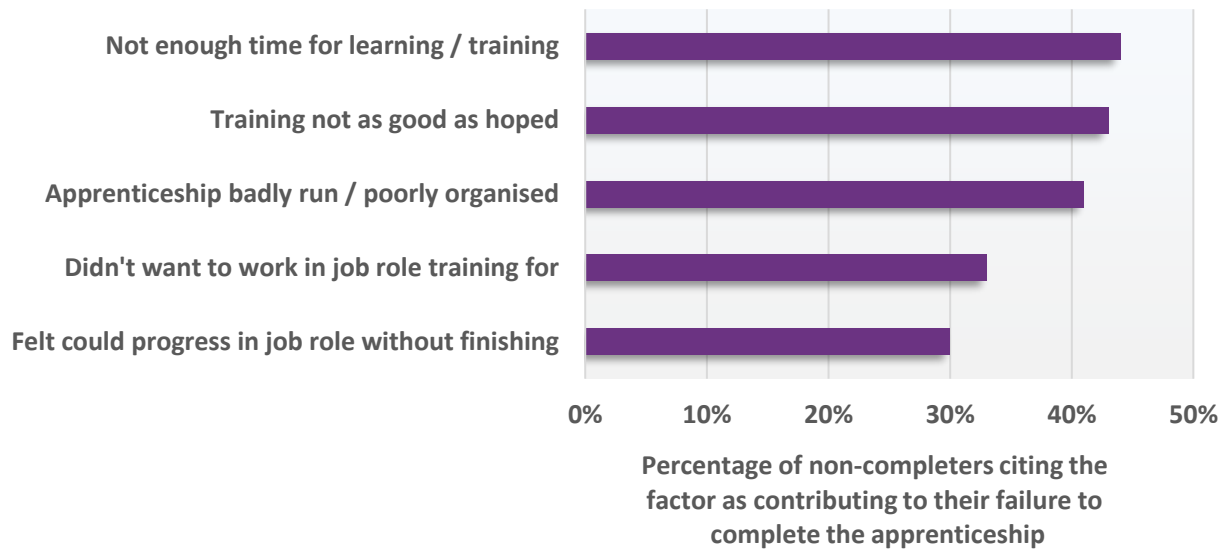
Following the Review’s publication, some significant changes were made to apprenticeships in England. For example, the first apprenticeship ‘standards’ were approved for delivery in 2014, and since then the Government has gradually withdrawn frameworks, with almost all new apprenticeship starts now based on standards.¹² Other notable changes include the establishment of the ‘Institute for Apprenticeships and Technical Education’ (IfATE) in 2017 to oversee the development of standards and end-point assessments.¹³ 2017 also saw the introduction of the ‘apprenticeship levy’, which is in effect a payroll tax on employers with the largest pay bills that generates all the funding for apprenticeships. Alongside these changes to the content and delivery of apprenticeships, the Coalition Government set a target of 3 million apprenticeship starts between 2015 and 2020, although the target was never reached.¹⁴

Ten years on from the Review, one could argue that the apprenticeship system appears to be in reasonable health, with the Government’s latest survey of apprentices showing that 60 per cent of learners report a satisfaction score of 8 out of 10 or higher.¹⁵ However, this means that 40 per cent of apprentices – equivalent to around 250,000-300,000 learners at present – feel that their apprenticeship is not living up to expectations. Among those who report being dissatisfied with their apprenticeship, the most common reasons were a lack of support from their training provider (54 per cent), the apprenticeship being badly organised (41 per cent), the poor quality of training (33 per cent) and an overall lack of training (21 per cent).¹⁶ These figures suggest that the high-quality apprenticeship training demanded by the Richard Review a decade ago is still not being delivered in a large number of cases.

In light of this, it is perhaps unsurprising that almost half (47 per cent) of apprentices do not complete their programme.¹⁷ This compares unfavourably with the drop-out rates for A-levels (8.7 per cent¹⁸) and university (5.3 per cent¹⁹). Some factors that contribute to these apprenticeship drop-out rates are clearly beyond the control of ministers and civil servants, such as the effects of the COVID-19 pandemic and personal factors such as mental health issues. Nevertheless, Figure 1 (overleaf) shows that among those who leave their apprenticeship due to problems with the apprenticeship itself, many attribute this to the lack of high-quality training that they received or the negligible value of the training on offer. In

fact, 70 per cent of apprentices who drop out report that they had concerns about the quality of their apprenticeship²⁰ – suggesting that these problems may be widespread.

Figure 1: Top five apprenticeship-related reasons why respondents did not complete their programme ²¹



Being enrolled on a low-quality training course can be detrimental to learners for a variety of reasons. First and foremost, the minimum wage for apprentices (£4.81) is well below the national minimum wage (£6.83-9.50 depending on their age)²² because apprentices are generally agreed to be less productive while training. This lower wage for apprentices is also a form of investment in themselves given their reasonable expectation of being paid more in the long run when fully trained. However, if the high-quality training that apprentices expect and require does not materialise, they are left at risk of accepting a lower wage without any longer-term benefits. In addition, if an apprentice is enrolled on a poor-quality programme, their lack of training and development (plus the opportunity cost of the months spent on the programme) could harm their career opportunities and wage prospects in future.

Low-quality apprenticeships have implications for other stakeholders too. Employers delivering substandard training are likely to struggle to retain their staff as well as potentially worsening any skills shortages in their organisation. Employers in the same sector may subsequently be put off from employing learners who have completed an apprenticeship due to concerns about the variable quality of training being provided. Furthermore, society and government will see a lower return on their investment in apprenticeships, as low-quality programmes do little to build a productive workforce and contribute towards economic growth. The damage that could be done to the apprenticeship 'brand' should also not be underestimated. If apprenticeships gain a reputation for being low-quality training courses

with few benefits, this may deter potential apprentices – especially younger recruits whose parents and teachers may no longer deem apprenticeships to be an acceptable option (most obviously when compared with a university degree).

This report is the second of two major research projects by EDSK this year on apprenticeships, [the first of which looked at the impact of the apprenticeship levy since 2017 alongside the wider question of employer investment in skills and training](#). Given the alarming situation with apprenticeship drop-out rates and the reports from apprentices of pervasive problems with low-quality training, this report will investigate whether the quality of apprenticeships in England remains a problem ten years after the Richard Review was published. Following a discussion of how ‘apprenticeships’ are currently defined, each chapter in the report will examine a problem identified by the Richard Review in relation to apprenticeship quality as well as the solutions that the Review proposed and whether the necessary changes have been implemented in the intervening decade. The report will conclude with a set of recommendations that aim to ensure that every apprenticeship provides a high-quality training programme that benefits learners, employers, taxpayers and society.

2. What is the definition of an ‘apprenticeship’?

One of the weaknesses in the apprenticeship system identified by the Richard Review was the absence of a clear definition of the term ‘apprenticeship’:

“There has been a drift towards calling many things apprenticeships which, in fact, are not. This does not help us define and support apprenticeships going forward. Simply enough, not all instances of training on a job are apprenticeships.”²³

The Review asserted that to combat these issues, “we must create a clear and common understanding about what is and is not an apprenticeship”.²⁴

“An apprenticeship is a form of education, based in the workplace. It must be attached to a real job and deliver broad and transferable skills that are recognised and valued across the sector. An apprentice must be new to the job or job role and the job must involve substantial and high levels of skill. Suitable candidates should have the potential to acquire the skills to do the job well, even if they are starting from a low base.”²⁵

In the same year that the Richard Review was published, a report by the International Labour Office (ILO) set out the internationally accepted definition of an apprenticeship:

“‘Apprenticeship’ is taken to denote training programmes that combine vocational education with work-based learning for an intermediate occupational skill (i.e., more than routinised job training), and that are subject to externally imposed training standards, particularly for their workplace component.”²⁶

The ILO definition also incorporated other key features of an apprenticeship:²⁷

- they are based in the workplace and supervised by an employer;
- they are intended for young people;
- the fundamental aim is learning a trade/craft or acquiring a skill;
- the training is ‘systematic’ i.e. follows a predefined plan (a “programme of learning”);
- the training is to established standards for a recognised occupation;
- it is governed by a contract between apprentice and employer;
- it provides long-term training;
- there is also off-the-job education and training;
- there is external regulation of training standards both in and outside the workplace.

In 2013, the Department for Education (DfE) and then Department for Business, Innovation and Skills (BIS) published their own definition of an ‘apprenticeship’ as they began to implement the proposals from the Richard Review (Box 1²⁸).

BOX 1: WHAT IS AN APPRENTICESHIP?

An Apprenticeship is a job that requires substantial and sustained training, leading to the achievement of an Apprenticeship standard and the development of transferable skills.

This definition is underpinned by four principles of future Apprenticeships:

- An Apprenticeship is a job, in a skilled occupation
- An Apprenticeship requires substantial and sustained training, lasting a minimum of 12 months and including off-the-job training
- An Apprenticeship leads to full competency in an occupation, demonstrated by the achievement of an Apprenticeship standard that is defined by employers
- An Apprenticeship develops transferable skills, including English and maths, to progress careers.

From the outset, it was clear that the Government’s definition was a poor imitation of the ILO’s equivalent. It offered no definition of a ‘skilled occupation’ to differentiate it from low-skill or unskilled roles. Even the phrase ‘occupation’ was not explained, leading to a remarkable situation in which the Government left it up to employers to decide what constituted an occupation (and would therefore be labelled as an ‘apprenticeship’). There was also no mention of other critical features of an apprenticeship such as the need for a systematic training plan, the importance of combining on- and off-the-job training or any external regulation of the training standards.

More recently, the IfATE has set out what should constitute an ‘occupational standard’, which applies to apprenticeships and other forms of technical training. Each occupational standard is a description of an occupation that outlines the knowledge, skills and behaviours’ (KSBs) needed for someone to be competent in that occupation. These standards must meet IfATE’s criteria in order to be approved and thus eligible for apprenticeship funding (Box 2 overleaf²⁹). These new requirements have some similarities to the previous DfE / BIS definition of an apprenticeship, albeit with additional details in places. For example, the newer IfATE definition states that they will judge whether an occupation is ‘sufficiently skilled’, by “reviewing it against our occupation level guide and the Standard Occupation Classification (SOC) from the Office for National Statistics.”³⁰

BOX 2: OCCUPATIONAL STANDARDS REQUIREMENTS FROM THE IfATE

Transferable

This occupation must: be in demand in the labour market be transferable to a range of other employers and secure long term earnings potential, greater security and capability to progress meet the standards of a range of employers rather than the needs of one employer.

Sufficiently broad, deep and skilled

This occupation must: be sufficiently skilled in terms of breadth and depth to require employment and training or education of at least a year's duration (for apprenticeships, this means that full-time apprentices working 30 hours or more per week should spend an average of at least 6 hours per week in off-the-job training).

Provides full occupational competence for new entrants

This occupation must: fully define occupational competence for a new entrant to the occupation rather than only part of this.

Recognised and stands alone

This occupation must: be recognised by a range of employers and people practising the occupation, be one occupation relating to one level only at 2 to 7, aligns with an occupation within the relevant occupational map, or the occupation could be added, be recognised by relevant professional bodies and/or regulators.

The IfATE has also offered further guidance on what count as an 'occupation' and how they will assess this (e.g. comparing the occupational standard with job advertisements). In addition, each standard must only relate to a single occupation and be recognised by employers and those working within the relevant profession. Even so, some of the most glaring omissions from the Government's earlier definition of an apprenticeship – such as the need for a systematic training plan or any proper regulation of training standards – remain absent from the IfATE's requirements.

Leaving aside the weaknesses in its description of an apprenticeship, the IfATE has nevertheless set out to employers, training providers, Ofsted and politicians how they will judge the quality of apprenticeship standards. One could therefore reasonably expect all apprenticeship standards to meet these requirements without exception. The following chapters will examine whether this is indeed the case.

3. Who is in charge of apprenticeships?

The Richard Review had criticised the ‘apprenticeship frameworks’ that preceded the new standards, with many stakeholders expressing concerns that the “process for influencing apprenticeship frameworks was overly complex.”³¹ Furthermore, despite a “consistent view” across all stakeholders that “employers and industry are best placed to determine the content and outcome of apprenticeships”, the majority were “not satisfied that this currently happens.”³² As a result, the Review proposed that frameworks should be replaced by employer-designed standards:

“We must turn the system on its head and set a few clear standards: preferably one per occupation, which delineates at a high-level that is meaningful to employers what it means to be fully competent in that occupation [...The standards should] focus solely on setting out, in terms relevant and meaningful for employers, what an apprentice should be able to do and know at the end of their apprenticeship.”³³

In short, the Review believed that the new standards “should be set by those who know best: employers.”³⁴ This was to become the main component of the Government’s ‘employer-led’ mantra that has dominated the apprenticeship system ever since the Review. This notion of ‘employer-led’ apprenticeships is, in essence, the belief that employers should be allowed to determine the content and coverage of the apprenticeships programme. No-one doubts the central role that employers should play in designing and delivering a high-quality apprenticeship system, yet the Richard Review added that it was nevertheless important to “[give] Government a clearer role in defining what a good quality standard looks like.”³⁵ This was a crucial point, as allowing employers to decide on the shape and size of every apprenticeship without sufficient checks and balances on the quality of what employers were producing was always likely to generate problems.

The rapid growth of apprenticeship standards

Although the Richard Review had concluded that the old apprenticeship frameworks were “far too complex”,³⁶ it soon became apparent that the move from frameworks to standards would not easily resolve this. The new standards were developed by ‘Trailblazers’ - groups of typically 10 to 20 employers intended to be representative of those likely to use the apprenticeship that they were designing (e.g. sector, size and geographical spread).³⁷

In 2015, just a couple of years into the implementation of the new standards, then Skills Minister Nick Boles also criticised the “unbelievable proliferation” of apprenticeship frameworks when he gave evidence to the Education Select Committee, declaring “what I promise you we will achieve, is many fewer standards”.³⁸ However, later that year, BIS announced that “there are now over 140 Trailblazer groups that so far have collectively delivered or are in the process of delivering, over 350 standards.”³⁹ (compared to 181 frameworks at the time of the Richard Review).⁴⁰ Graham Stuart, then Chair of the Education Select Committee, said that it was:

“...disappointing that ministers have still been unable to simplify the confusing landscape of different standards that are applied to Apprenticeships, the sheer complexity of which risks diluting the consistency of the qualification.”⁴¹

The 2016 government-commissioned review of technical education for 16 to 19-year-olds, led by Lord Sainsbury, also voiced concerns about how rapidly the standards were expanding and the detrimental effect this could have on the quality of apprenticeships:

“...we are [...] concerned that some existing apprenticeship standards, at least at face value, seem to overlap significantly with others, be firm- rather than occupation-specific, and/or contain insufficient technical content. If this is indeed the case, it risks a proliferation of low-value or niche standards, creating complexity and recreating all the problems of the previous system.”⁴²

The Review recommended that all apprenticeship standards should be reviewed “at the earliest opportunity” to ensure there is no substantial overlap between standards and that every standard contains sufficient technical content to warrant at least 20 per cent off-the-job training (a new requirement that was added after the Richard Review – discussed in more detail in chapter 6). Moreover, “standards found to be overlapping or wanting in terms of breadth or technical content should be revised, consolidated or withdrawn.”⁴³

Regrettably, these warnings were ignored by ministers and senior civil servants. At the time of writing, there are now 653 Apprenticeship standards approved for delivery and another 61 currently in development.⁴⁴ This continued proliferation poses two major risks. First, having so many standards makes the system more confusing for learners, employers and training providers. Secondly, it increases the likelihood that poor-quality standards will emerge.

A new government body to oversee apprenticeships

To accompany the significant changes being made to apprenticeships, the Government's 2015 Spending Review had already outlined their intention to establish a new body to govern the reformed system:

*"The government will establish a new employer-led body to set apprenticeship standards and ensure quality. The body will be independent of government and will also advise on the levy funding each apprenticeship should receive."*⁴⁵

This was an odd statement, as the UK already had a body not dissimilar to what was described. The UK Commission for Employment and Skills (UKCES) was a non-departmental public body that had provided advice on skills and employment policy to the UK Government and the devolved administrators since 2008. The UKCES was chaired by Sir Charlie Mayfield, Chairman of the John Lewis Partnership, and overseen by a group of 30 'Commissioners' who were a mixture of businessmen and women, trade union representatives and education, employment and skills experts.⁴⁶ The UKCES had a range of responsibilities including conducting research into issues such as productivity, skills shortages, employer collaborations and improving supply chains. This breadth, as well as the shared ownership of its work across a varied set of stakeholders, made the UKCES a well-regarded organisation that provided a critical interface between government and the education and skills system. Regardless, it was closed in March 2017 without explanation.⁴⁷

As the UKCES was in the process of being shut down, the Government established the 'Institute for Apprenticeships' (IfA; later renamed the Institute for Apprenticeships and Technical Education, or IfATE) to meet their 2015 Spending Review commitment. Somewhat embarrassingly, no-one from the world of employment and skills seemed interested in leading this new organisation, and the IfA was forced to go months without a Chief Executive. There were two reasons for this. First, the way that the UKCES and its supporters had been treated deterred any serious candidates from putting themselves forward. Second, the IfA reports directly into the Secretary of State for Education and its responsibilities are limited to overseeing "the development, approval and publication of apprenticeship standards and assessment plans as well as the occupational maps".⁴⁸ This made it clear that ministers had no interest in allowing other stakeholders to influence how the apprenticeship system was run – a stark contrast to the more collaborative approach taken by the UKCES.

The search for a Chief Executive only ended six months later when Sir Gerry Berrigan, an existing board member at the IfA, said "well, you know, if you want I'll throw my hat in the ring".⁴⁹ When Sir Gerry stepped down two years later, the Chief Executive role ended up being given to a senior civil servant – again, a far cry from a leading figure in the employment

and skills sector. The new Chief Executive subsequently claimed that the IfA had “a degree of authority... to speak on behalf of employers”.⁵⁰ This came as something of a surprise to many employers, seeing as they were not given a choice as to whether the IfA apparently spoke on their behalf, nor has their blessing been sought at any point since.

Employers have subsequently taken on some limited functions within the work overseen by the since-renamed IfATE. For example, there are 15 ‘occupational route panels’ that supposedly “represent the employer voice within IfATE”.⁵¹ As “experts in their industry”, panel members are responsible for ensuring that apprenticeship standards and T Level qualifications are “high quality” and meet the needs of stakeholders and the economy at large.⁵² This engagement with employers is encouraging, but handing a tiny number of employees from each sector the opportunity to approve occupational standards and assessment plans demonstrates their minimal interest in collaborating with a wider group of stakeholders to increase the quality of apprenticeships.

In addition to the employer panels, the IfATE has a panel of apprentices who purportedly ensure that “the views of apprentices are represented across the work and governance of the Institute”.⁵³ That said, the IfATE website makes no mention of apprentices being given any role in the development or approval of apprenticeship standards, nor do there appear to be any mechanisms through which apprentices can challenge the decisions made by employers about what constitutes a high-quality training programme. Consequently, as with the employer panels, the IfATE restricts the input from external stakeholders despite the value that they could add to monitoring and improving the quality of apprenticeships.

Independent reviews of the work of the IfA and then the IfATE have delivered damning verdicts. In 2018, the Education Select Committee stated that:

*“Our predecessors were supportive of the creation of the [IfATE]; we have heard more mixed views, with some employers being privately very critical of its approach. It has had a difficult job: a supposedly employer-led body required to take direction from the Secretary of State, but at times it has appeared more successful in uniting stakeholders in opposition than anything else. We could do with fewer unseemly spats and vainglorious announcements, and more action.”*⁵⁴

In the same year, the House of Lords published a report into education and training routes for young people. It found that the performance of the IfATE since it formally began operating in 2017 had been deeply disappointing. The report observed that for those wanting to develop standards, the “most bureaucratic” system was “a source of frustration for employers and a huge business risk to training providers.”⁵⁵ Furthermore, the limited responsibilities and influence of the IfATE meant it was “not clear... which body had overall responsibility for

apprenticeships". Given the impact of the IfATE since its launch, the House of Lords recommended that it "should be abolished."⁵⁶ Although the Government's desire to create an employer-led body to create apprenticeship standards had some merit, the IfATE is not 'employer led' in any meaningful sense and after five years of operation its credibility among employers remains uncertain, to say the least. As will be explained in the following section and in subsequent chapters, the Government's related wish for the IfATE to 'ensure quality' has also not been realised.

The risks posed by weak quality assurance

The Richard Review was keen on employer-led standards, yet the Review rightly highlighted the critical role that government must play in generating high-quality standards. During the National Audit Office's (NAO) first major investigation into the apprenticeship programme in 2016, they recognised that while the Government "might reasonably expect the vast majority of employers, training providers and assessment bodies to act properly in response to apprenticeship reforms, a small minority may behave in unintended ways." This included the possibility that employers may use the apprenticeship reforms to "artificially route other forms of training into Apprenticeships."⁵⁷ A later NAO investigation in 2019 found that predictions of employers taking advantage of this opportunity to route other training into 'apprenticeships' had become a serious problem:

*"The apprenticeships programme now encompasses wider range of professions and types of training... However, these new types of apprenticeship raise questions about whether public money is being used to pay for training that already existed in other forms. Some levy-paying employers are replacing their professional development programmes – for example, graduate training schemes in accountancy or advanced courses in management – with apprenticeships. In such cases, there is a risk that the additional value of the apprenticeship to the economy may not be proportionate to the amount of government funding."*⁵⁸

The NAO's report noted that the Government "recognises that some employers use apprenticeships as a substitute for training and development that they would offer without public funding".⁵⁹ In addition, Ofsted has warned that "we have seen examples where existing graduate schemes are in essence being rebadged as apprenticeships [and] this might meet the rules of the levy policy, but it falls well short of its spirit."⁶⁰

As shown in Box 2 earlier in this report, the IfATE has set out clear requirements that every apprenticeship standard must meet. This includes a direct link between the standard and real-world job adverts as well as ensuring that the standard only represents a single occupation

and that the occupation described by the standard is widely recognised by employers. Regrettably, these requirements are frequently breached by employers with few (if any) consequences, even though the consequences for apprentices and taxpayers can be considerable.

Perhaps the most egregious example of this failure to adhere to the rules is the Level 7 'Accountancy or Taxation Professional' standard.⁶¹ It has been designed by employers to attract as many recruits as possible, starting with a vague suggestion that it is aimed at "providing financial information and advice to different organisations".⁶² The standard goes on to claim that it covers every one of a number of high-skill roles as diverse as Management accountants, Tax advisers, External Auditors, Financial analysts, Forensic accountants and Business advisors.⁶³ These are self-evidently different occupations that require employees to learn distinct skills and knowledge to perform each role correctly. Worse still, the notion of an 'Accountancy or Taxation Professional' does not exist outside of the apprenticeship system and the authors of this report could not find a single advert across multiple job posting sites that refers to the existence of such a role. In other words, this apprenticeship standard should not exist if the IfATE had simply applied its own rules about occupations and role recognition.

Far from being an idle complaint, the Level 7 'Accountancy or Taxation Professional' standard has consumed more apprenticeship funding over the last five years than *any other apprenticeship in England*. Since 2017/18, over 34,000 'apprentices' have started this £21,000 course⁶⁴ – creating a maximum spend of almost £720 million over this period. This is around 25 per cent more than the second most expensive 'apprenticeship'. Given the concerns around the questionable 'added value' of rebadged graduate training programmes, this situation should never have been allowed to develop to such an extent without being challenged.

Another example of an IfATE-approved standard that fails to meet the IfATE's own rules is the Level 7 'Senior Leader' role. Just like the 'Accountancy or Taxation Professional', this standard opens with a nebulous claim that it is aimed at any "leader who has senior management responsibility".⁶⁵ Indeed, the standard claims to be suitable for Chief Operating Officers, Chief Financial Officers, Chief Executive Officers, senior military officers and Heads of Department / Faculty among others.⁶⁶ Again, job adverts for generic 'Senior Leaders' do not exist, it is not a standalone occupation outside of the apprenticeship system and employers do not recognise it as an occupation. On all three counts, this standard should never have been approved.

The 'Senior Leader' standard remains popular among employers, with around 21,000 starts over the last five years.⁶⁷ With each start costing up to £14,000, this single standard has attracted almost £300 million of apprenticeship funding since 2017. This popularity is underpinned by the 'flexibility' offered by such an ambiguous and open-ended standard that

bears no relation to any genuine occupation, which is particularly helpful for large employers seeking to use up their sizeable apprenticeship levy contributions as quickly as possible on approved 'apprenticeships'.

It is unclear why the IfATE has failed to act on these repeated (and hugely costly) breaches of its own rules, suffice to say that an organisation with greater credibility among the main stakeholders in the apprenticeship system may have been better placed to withstand pressure from large employers to allow such inappropriate training courses to be relabelled as an 'apprenticeship'. What is abundantly clear, though, is that the tension between employer-led standards and the government's role in assuring quality remains unresolved. This awkward situation is now actively undermining the quality of tens of thousands of apprenticeships every year, as will become evident throughout the remainder of this report.

4. Low-skill roles being rebadged as ‘apprenticeships’

The Richard Review found that many ‘apprenticeships’ at the time were low-skill roles and consequently were “not offering consistently challenging, deep or broad experiences for the apprentice.”⁶⁸ Moreover, the Review noted that “some frameworks have very low numbers of guided learning hours, and some are not really linked to a specific job at all, for example customer service.”⁶⁹ On a broader level, the Review highlighted the negative effects of “diluting’ the [apprenticeship] brand by encompassing low skilled roles within it.”⁷⁰ The Review was clear that apprenticeships are unsuitable for low-skill positions:

“[A] core feature of an apprenticeship is that it is most meaningful for jobs which require substantial training and high levels of skill. Not all jobs can or should be associated with an apprenticeship role. That is not to say that relatively low skilled jobs do not require some form of training and investment in skills; most jobs will require some basic training and on the job learning. But, where the transition into a new role can be made relatively quickly, without a large investment in time and resources to deliver the skills needed to do the job, or where an employer would expect to provide this level of training themselves to all new employees, then an apprenticeship role is unlikely to be an efficient or proportionate way of investing in the learner.”⁷¹

The Review was in no doubt that “we should focus apprenticeships on those jobs that need substantial investment in skills, and rely on other forms of training to support individuals in lower skilled jobs.”⁷²

Low-skill and routine jobs

Many employers have used the ‘Trailblazer’ process to produce high-quality and demanding apprenticeship standards aimed at helping young people make the transition from school or college into the workplace. However, other employers appear to be using this same process to design standards that merely rebadge low-quality and low-skill roles as an ‘apprenticeship’ to gain access to the funding generated by the apprenticeship levy. As a result, despite the Richard Review’s assertion that apprenticeships were only appropriate for jobs that require substantial investment in skills and training, it is plainly apparent that low skill ‘apprenticeships’ are just as prominent today as they were in 2012.

One example of such behaviour from employers can be seen in the ‘Hospitality Team Member’ standard, which claims to train learners to work in bars, restaurants, cafés, conference centres and hotels. However, apprentices only train towards a single ‘specialist area’ during the 12-

month course (e.g. Barista, Food and Beverage Service, Housekeeping, Reception). The desire for specialisation is so extreme that an apprentice on the 'Alcoholic Beverage Service' specialism must choose between training for 'wine service', 'beer / cask ale' or 'cocktails / mixology'.⁷³ In contrast, the German 'Specialist in the Hospitality Industry' trains people to work in the same types of establishments but offers a two-year training package that includes 600 hours of training to ensure staff can work in the kitchen to prepare and deliver meals, serve food and advise customers, take orders from diners, work at the bar, lay tables, prepare buffets, complete housekeeping tasks, oversee stock control and store goods as well as learning about marketing, sales promotions and merchandising.⁷⁴ The gap in skill levels required to complete England and Germany's respective offerings could not be clearer.

To further illustrate the paucity of skilled training needed to be a 'Hospitality Team Member', several examples of job adverts for this standard found on the Government's 'Find An Apprenticeship' service⁷⁵ are presented below. While the roles described in these adverts certainly need carrying out by an employee, they fall well short of meeting the IfATE's definition of an 'apprenticeship' because they are not "sufficiently skilled in terms of breadth and depth to require employment and training or education of at least a year's duration".⁷⁶ Yet again, this raises awkward questions about why this standard was approved in the first place, let alone why it continues to exist today.

The advert in Box 3 was an opportunity to join the hospitality team in an independent nursing home. Not only is there an absence of any skilled elements to this job, but it is also difficult to see how these duties could offer an apprentice the opportunity to "secure long term earnings potential, great security and capability to progress"⁷⁷ – another formal requirement set out by the IfATE for all apprenticeships.

BOX 3: Hospitality Team Member Apprentice

Duties include:

- Assisting with trolley service of drinks and snacks during the day
- Assisting with preparing light snacks, salads
- Heating and servicing precooked meals
- Serving meals including preparing the dining room and setting tables, room service
- Clearing and cleaning after food service

Similarly, Box 4 shows a 'Barista apprenticeship' advert from the coffee chain Starbucks that offered very limited duties and responsibilities. As the Richard Review acknowledged, this role would still require "some basic training", but it would obviously not require "a large

investment in time and resources to deliver the skills needed”.⁷⁸ Once again, this fails to meet the IfATE’s definition of an apprenticeship, as it does not require training that lasts for at least one year – a point emphasised by the fact that Starbucks typically train their new staff in just two weeks.⁷⁹

BOX 4: Barista Apprenticeship

Duties include:

- Providing quality beverages and food products for all customers
- Follow health, safety and sanitation guidelines for all products
- Handle cash and other payment transactions safely and securely

You will develop your knowledge of the industry and gain the skills that will ensure your customers feel well looked after and have a great experience.

The ‘Apprentice Housekeeper’ advert shown in Box 5 was from a large specialist housing and care provider. As with the previous examples, this is a low-skill role that contravenes the IfATE definition of an apprenticeship as it requires training of minimal breadth and depth, with ‘apprentices’ merely performing basic routine tasks.

BOX 5: Apprentice Housekeeper

Duties include:

- Responsible for the location being clean, pleasant and safe
- Providing an effective and efficient laundry service
- Washing, drying and ironing customers clothes and linen
- Ensuring cleaning products are used effectively and instructions are followed
- Ensuring health and safety procedures are followed at all times
- Carrying out equipment checks and report concerns
- Carrying out minor repairs and labelling of clothes

Despite the poor quality of the Hospitality Team Member standard, just over 19,000 learners have started training on it in the last five years⁸⁰ – making it one of the most popular courses available to employers (who are presumably grateful for the opportunity to draw down apprenticeship funding for such a lacklustre short training course).

As the Richard Review noted, low-skill roles in fields like customer service are not an ‘apprenticeship’. It is therefore worrying that a Level 2 ‘Customer Service Practitioner’ standard is approved by the IfATE despite not meeting its definition of a skilled standalone occupation or one that requires substantial breadth and depth in the associated training. To illustrate the point, the duties listed on this standard are littered with general concepts such as delivering “high quality products and services to the customers” and demonstrating “excellent customer service skills”. In addition, apprentices must “understand who customers are”, “know the purpose of the business” and “understand how to build trust with a customer and why this is important.”⁸¹ In other words, this standard merely refers to skills that are required within many occupations. Box 6 shows a job advert for this standard, which would require nothing more than a few weeks of training in general office skills.

BOX 6: Customer Service Practitioner

You will have a varied role to help the business run smoothly:

- To answer the telephone in an appropriate manner and time, take messages and transfer calls as necessary
- Data entry
- Maintain the website
- Monitor and respond to general emails etc.
- To undertake training as necessary for the role
- To undertake such other duties as may be required within the general scope of the job

The advert in Box 7 from a climbing centre leaves a similar impression, with the ‘apprentice’ expected to engage in activities that are entirely generic and represent low-level routine tasks that require minimal training. What’s more, this employer – just like many others that use this apprenticeship standard – is only offering the minimum apprentice wage of £4.81 an hour.

BOX 7: Customer Service Apprentice

What will the apprentice be doing?

- Meeting customers
- Booking them in for sessions
- Taking telephone bookings
- Making drinks and meals for customers
- General cleaning duties

Indeed, multiple adverts for this standard confirm that it is used to recruit low-level staff by an array of businesses including at a crematorium, a solicitor, car dealerships, football clubs, dental clinics, bike shops, estate agents and travel agents, to name just a few.⁸² This shows beyond any reasonable doubt that this standard does not relate to a single occupation at all – another breach of the IfATE’s definition of an apprenticeship. To emphasise the point, many employers even use this standard as a substitute for hiring retail or admin staff:

- **CUSTOMER SERVICE APPRENTICE:** “...to assist with duties such as meeting and greeting customers... help our customers make the most of their retail opportunities.”
- **APPRENTICE CUSTOMER AND RECRUITMENT ADMINISTRATOR:** “A customer service orientated apprenticeship which encompasses recruitment tasks.”
- **CUSTOMER SERVICE APPRENTICE:** “...you will work in the Retail outlet within the Pharmacy and deal with cash/card payments and provide excellent customer service.”
- **APPRENTICE ADMINISTRATOR:** “We are looking for two Admin Apprentices... you will have the opportunity to earn a Level 2 Customer Service Practitioner qualification.”

As the Customer Service Practitioner standard represents a poorly defined low-skill role that often attracts the apprentice minimum wage, it has become one of the most popular ‘apprenticeships’ among employers, with around 32,000 starts over the last five years.⁸³

Both the Hospitality Team Member and Customer Service Practitioner standards should be uncomfortable reading for anyone who wants high-quality apprenticeships provided to all learners. Unfortunately, as research by EDSK has previously pointed out,⁸⁴ the rebadging of routine low-skill roles as ‘apprenticeships’ to secure apprenticeship funding is alarmingly widespread. Trailblazer employers often spell out how low their ambitions are within the standard itself, with many standards openly acknowledging that the learner will have little autonomy or responsibility, no decision-making powers and is merely there to carry out basic support functions for other staff:

- **RECRUITMENT RESOURCER:** “Their role is to identify, attract and shortlist candidates for the recruitment process to fulfil the requirements of the business brief and provide resourcing support to the recruitment function.”⁸⁵ (the apprentice does not carry out any recruitment themselves – they just provide administrative support for a recruiter)
- **HOUSING AND PROPERTY MANAGEMENT ASSISTANT:** “...an entry level role [that is] primarily responsible for the administrative work. ...The role involves working under supervision”⁸⁶

- **INVESTMENT OPERATIONS ADMINISTRATOR:** *“A fully competent employee at this level will be capable of performing routine, non-complex tasks in these businesses.”*⁸⁷
- **JUNIOR ESTATE AGENT:** *“This is a customer-facing role with responsibility for providing the administrative support... working under supervision within the wider organisation”*⁸⁸

For this array of standards (and others) to have been approved in the first place is disappointing enough; their continued existence is deeply concerning. The IfATE is inexplicably not withdrawing them despite their obvious and numerous breaches of the IfATE’s definition of what constitutes an acceptable apprenticeship standard. As ever, the need to protect the interests of the learners who end up on these ‘apprenticeships’ appears to be a minor consideration. Apprentices often accept a lower wage with the expectation that they will gain longer-term benefits, yet anyone who enrolls on these particular ‘apprenticeships’ is not going to receive a high-quality training programme that will improve their prospects.

Similar (and often cheaper) training outside of an ‘apprenticeship’

Beyond the Richard Review, apprenticeships in England have been criticised in the past for “pretending, wastefully that many occupations require long periods of specialised workplace training when they do not.” Professor Alison Wolf – the author of two major reports on vocational education and apprenticeships since 2010 and a panel member for the Sainsbury Review of technical education in 2016 – has previously drawn attention to ‘Retail’ apprenticeships as an example of this practice, arguing that “the idea that most retail jobs require large amounts of workplace training in specific retail skills before they can be carried out is something to which employers’ hiring practices give an immediate lie.”⁸⁹

Despite this criticism, a ‘Retailer’ standard was approved for delivery in the reformed apprenticeship system.⁹⁰ The standard states that it involves “helping customers buy products or services from retail organisations such as department stores, garden centres, high street chains, supermarkets and online and mail order businesses.”⁹¹ The standard is so limited that its core ‘knowledge’ include statements such as “encourage customer loyalty”, “know the vision, objectives and brand standards of the business” and “maintain appropriate levels of the right stock”.⁹² Such bland assertions highlight the lack of specialist or technical knowledge within the course as well as how little skill is required to complete it. Nonetheless, it is another popular standard with almost 19,500 starts since 2017/18.⁹³

Box 8 shows a ‘Retailer’ apprenticeship advert. Leaving aside the obvious confusion caused by the considerable overlap between the content of this advert and the aforementioned ‘Customer Service Practitioner’ standard, the duties listed for this role are all low-level basic skills that do not meet the IfATE’s requirements for an apprenticeship. This advert is even more noteworthy as it was uploaded by the retailer *Savers* who are part of AS Watson UK - one of the Trailblazer employers involved in developing this apprenticeship standard. This advert also raises serious questions about the employer’s commitment to the formal IfATE requirement for an apprentice to have at least six hours per week of off-the-job training (see chapter 6 for a more detailed discussion of off-the-job training).

BOX 8: Apprentice retail sales assistant

What will the apprentice be doing?

- Demonstrating exceptional customer service
- Understanding exceptional customer service
- Understanding the business and maintaining the brand reputation
- Resolving customer queries
- Using knowledge to promote products to customers
- Highlighting promotional offers to work towards achieving sales targets
- Supporting promotion changes and stock rotation

Your training will take place in store, so no college days and no homework!

When looking at adverts for similar retail roles outside of apprenticeships, the expected duration of training is nowhere near 12 months. Aldi, a leading supermarket not involved in the Trailblazer group, state on their recruitment website that to be a ‘Store Assistant’ new recruits will receive a structured training programme that “normally lasts around 6 weeks”.⁹⁴ The use of ‘apprenticeships’ to enter roles that do not require much training has expanded into other corners of the labour market. An apprenticeship standard for ‘Cabin Crew’ was designed by a Trailblazer group that includes British Airways, easyJet and Virgin, yet these airlines’ own websites show that cabin crew training only takes a few weeks:

- **Virgin Atlantic:** “[our] 4 ½ week training programme will prepare you for take off”⁹⁵
- **Easyjet:** “you’ll learn everything you need to know in a three-week period”⁹⁶
- **British Airways:** Cabin Crew New Entrant training takes “between 4 to 6 weeks”⁹⁷

This makes the 12-month minimum duration for the Cabin Crew ‘apprenticeship’ look excessive and wasteful. Just like the Retailer standard, it fails to meet the IfATE requirement for the role to “be sufficiently skilled in terms of breadth and depth” to require 12 months of training.⁹⁸

Another example of a low-skill role that should have remained outside of the apprenticeship system is the new Level 2 ‘Urban Driver’ standard. The overview of the standard declares that apprentices will “transport goods by road to an agreed destination, quality and time”.⁹⁹ Duties include “fuel, prepare and monitor the urban vehicle”, “correctly load and unload goods” and “manoeuvre the vehicle into position”.¹⁰⁰ The standard notes that “either a category C or C1 license is a statutory requirement and must be passed before completing the apprenticeship”,¹⁰¹ alongside a Driver Certificate of Professional Competence (Driver CPC) which is a legal requirement for driving lorries professionally. However, outside of an apprenticeship, a C1 license can be obtained in as little as two days.¹⁰² Similarly, a Driver CPC card can be obtained by completing initial tests with both theory and practical elements, followed by 35 hours of periodic training across five years to maintain the certificate’s validity.¹⁰³ Some companies offer similar packages of training (including the required medical exam) over just six weeks, suggesting that a 12-month ‘apprenticeship’ is inefficient and unnecessary.

Yet another example of the inappropriate rebadging of jobs is the Level 2 ‘Dog Groomer’ standard. Learners are told that they will gain “knowledge and experience of different dog breeds, coat type and health conditions” and “adapt to the needs of the individual dog” such as life stage and behaviour.¹⁰⁴ They will also “understand canine behaviour” and “provide maintenance advice to the owner following the groom”.¹⁰⁵ These skills, while valuable, can be developed quicker elsewhere, and at a higher level than the apprenticeship offers. External courses are available that cover both the Level 2 *and* Level 3 Diploma in Dog Grooming with just 30 days of in-salon training plus 150 hours of home study through online learning modules¹⁰⁶ - making the trainee even more qualified than the apprentice and in less time too. On that basis, it is hard to justify this role being rebadged as an ‘apprenticeship’.

Traineeships

As the Richard Review noted, even though low skill roles should not be classed as an ‘apprenticeship’, this does not mean that they should not be offered at all. It argued that:

“We must recognise, going forward, that not all learners who want to do an apprenticeship will be ready to become an apprentice straightaway or will be attractive to a prospective employer – all the more so if apprentices are increasingly focussed on relatively higher

skilled jobs... Some learners, particularly younger ones or the long term unemployed, may need to learn the softer skills that will make them employable before they are ready to start an apprenticeship.”¹⁰⁷

To meet this need, the Review recommended that “a significant new offer should be introduced, developing [learner’s] employability skills, and where relevant, preparing them for a high skilled apprenticeship.”¹⁰⁸ This new programme, which the Review called ‘traineeships’ was intended to “replace existing apprenticeships where they are linked to lower skilled jobs.”¹⁰⁹

Although low-skill roles being rebadged as apprenticeships remains an endemic problem, the Government nevertheless introduced a new ‘traineeships’ programme in the academic year 2014/15. Traineeships are available to those aged 16 to 24 (or 25 with an Education, Health and Care Plan (EHCP)) and can last anywhere from six weeks to a maximum of one year, although most last less than six months. The content of a traineeship is tailored to a learner’s needs, including:¹¹⁰

- A meaningful work experience placement of at least 70 hours with a local employer
- Work preparation training with a training provider to learn skills required in the workplace, build confidence and offer support with CVs and interviews
- English, maths and digital skills support

This offer is targeted towards young people who are currently unemployed, have little or no work experience, are motivated to work and qualified up to Level 3 (e.g. A-levels or equivalents such as BTECs). Traineeships are free for young people, although they do not offer a wage as it is a ‘skills development programme’ rather than a form of employment.¹¹¹

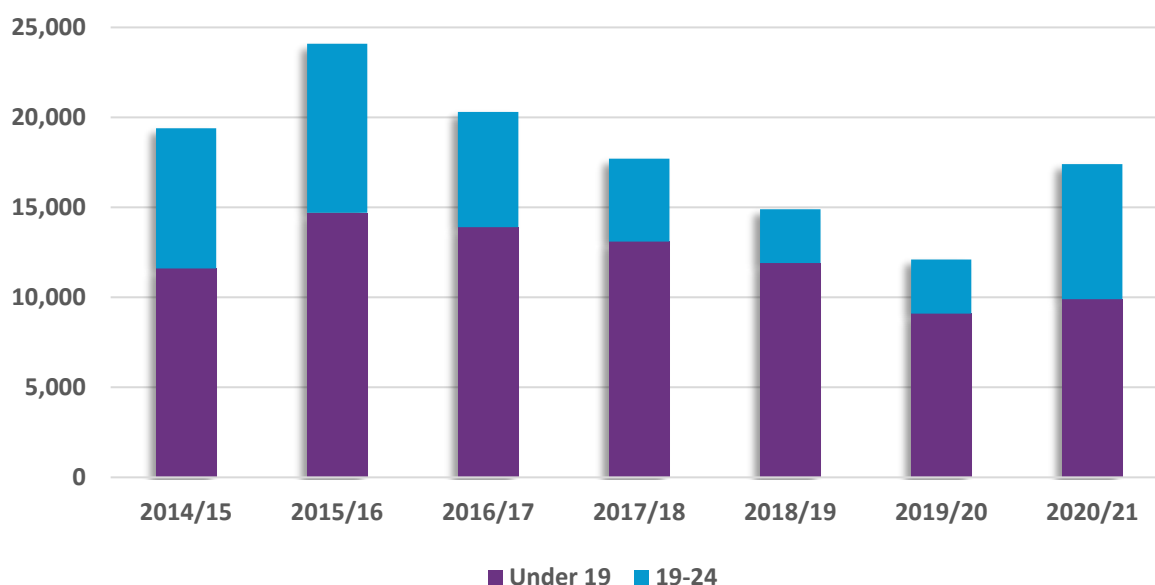
Encouragingly, traineeships appear to deliver impressive results. An official evaluation in 2019 found that around 75 per cent of trainees had moved to a positive destination (further education, apprenticeship or employment) within 12 months of starting a traineeship.¹¹² Moreover, an earlier survey had found that 82 per cent of trainees were satisfied with their experience of a traineeship, 92 per cent would recommend traineeships to other people and 83 per cent felt it had improved their chances in future job applications.¹¹³

Following these positive findings, the Government has recently introduced ‘occupational traineeships’ that aim to support progression into a specific apprenticeship or occupation by aligning the content of the traineeship with the relevant occupational standard.¹¹⁴ Examples of occupational traineeships include rail engineering, adult care and bricklaying, all of which are linked to their respective entry-level apprenticeships. The new rail and construction traineeships were developed as a collaboration between providers, sector bodies,

intermediary organisations, employers and the DfE¹¹⁵ to ensure they are matched to the needs of the stakeholders involved in delivering them, as opposed to a generic traineeship programme that can lack sector-specific content. An evaluation of the early pilots of occupational traineeships indicated that they have a higher overall completion rate than traineeships as a whole and lead to higher levels of progression into employment.¹¹⁶

Despite the positive outcomes of traineeships, the programme still suffers from a lack of visibility. A survey of young people in 2021 found that 66 per cent had never had traineeships discussed with them.¹¹⁷ This may explain why traineeships have struggled to gain traction since they were introduced (see Figure 2), although there are signs of increased uptake in the most recent academic year with 13,200 traineeship starts recorded between August 2021 to April 2022 (an increase of 2.9 per cent from the same period last year).

Figure 2: The number of learners starting a traineeship in England ¹¹⁸



As Figure 2 shows, prior to 2020/21 there had been a steady decline in the number of learners starting a traineeship, but in response to the disruption caused by COVID-19 the Government began offering a £1,000 bonus for employers hosting a traineeship work placement from September 2020 to July 2022 (up to a maximum of 10 learners).¹¹⁹ By the June 2022, the DfE had paid out 4,779 of these bonuses.¹²⁰ Furthermore, in March 2021, then Chancellor of the Exchequer Rishi Sunak committed £111 million of new funding for traineeships to support an additional 40,000 traineeships in 2021/22.¹²¹ However, the DfE had to hand back £65 million of this funding to the Treasury, “due to several delays in running a procurement to increase training provider capacity to deliver the pre-apprenticeship programme”.¹²²

This recent investment has been welcomed by training providers, although the unpaid nature of traineeships continues to hamper their visibility and attractiveness among potential recruits. Consequently, there have been calls for young trainees to be offered some form of financial support. Jane Hickie, the Chief Executive of the Association of Employment and Learning Providers (AELP), has argued that limiting access to those willing to take on an unpaid placement risks traineeships being a “last resort” for young people.¹²³ Hickie argues that a “government-funded subsidy – perhaps similar to the apprenticeship rate” would be a “godsend” for trainees, as well as giving out a “strong signal” that traineeships are a viable route to move quickly into a job, further study or an apprenticeship.¹²⁴

Another option that has been put forward is that England should follow the lead taken by Wales, where young people on traineeships receive a weekly training allowance as part of the ‘Jobs Growth Wales+ initiative’. This training allowance differs depending on whether young people are on the ‘engagement strand’ (£35 pw) or ‘advancement strand’ (£55 pw), but it does not affect their Universal Credit entitlement.¹²⁵ If the Government wishes to see traineeships increase in popularity, revising their status as an unpaid skills development programme is therefore an obvious candidate for reform. This could, in turn, provide a new mechanism for tackling the worrying expansion of low-skill roles masquerading as ‘apprenticeships’.

5. Upskilling and deskilling

The use of ‘apprenticeships’ to train workers for low-skill roles was not the only issue that the Richard Review felt was undermining the apprenticeship programme. The Review found that “employers themselves... recognised that some of the apprenticeships they offer are actually upskilling – or largely accreditation – programmes for existing workers rather than ‘apprenticeships’”.¹²⁶ While those employers argued that such training offered benefits such as boosting staff morale, retention and reengaging workers with learning,¹²⁷ the Review was adamant that “increasing the skills of people within an existing job which they are already competent in is not an apprenticeship.”¹²⁸ The Review highlighted the risks associated with continuing to allow such training to be labelled as an apprenticeship:

“Training to improve the skills of someone who has been in their job for some time, or is not yet ready to commence a job, are vital in their own terms and, in certain circumstances, these forms of training merit the support of Government. But they require different models; imposing an apprenticeship model on these functions risks delivering poorer value for money, the wrong approach to training, and risks distracting apprenticeships from their core purpose.”¹²⁹

To avoid these issues in future, the Review made clear that “an apprenticeship is not a programme for any training needed for any job”.¹³⁰ Furthermore, it argued that an apprenticeship “should not be about upskilling or accreditation for those that already have the skills to do the job.”¹³¹ While it was widely agreed that upskilling is “valuable”,¹³² the Review asserted that:

“...these activities are not apprenticeships and they should remain clearly distinct from the apprenticeship programme. This is important for ensuring efficient and effective application training, and for maintaining value for money and a strong and credible brand.”¹³³

Apprenticeships that aim to ‘upskill’

Despite the Richard Review’s warning about the misuse of apprenticeships for upskilling, the practice persists to this day. Many standards, even those aimed at senior employees and recruits, represent little more than a set of additional skills rather than a standalone occupation and are not “clearly targeted at those who are new to a job or role that requires sustained and substantial training.”¹³⁴

A prominent example of this problem is the Level 3 ‘Team Leader / Supervisor’ standard. The standard is intended to develop skills such as “managing teams and projects to meet a private, public or voluntary organisation’s goals.”¹³⁵ The key responsibilities include “supporting, managing and developing team members” and “building relationships internally and externally”.¹³⁶ This standard is by far the most popular apprenticeship in England, with over 87,000 starts since 2017/18 – almost 70 per cent more than any other standard. Unsurprisingly, it has also proved expensive, costing up to £393 million over this period.

Effective management practices are beneficial within any economy and seeking to improve management skills is a worthwhile exercise in general. Even so, relabelling management training courses as ‘apprenticeships’ is very inefficient. The Team Leader / Supervisor standard is eligible for a maximum of £4,500 of apprenticeship funding. However, the Chartered Management Institute (CMI), who led the creation of the standard and deliver the end-point assessment, also offer a Level 3 Diploma in ‘Principles of Management and Leadership’. This Diploma is aimed at “practising or aspiring managers who supervise or manage a team” and provides “an overview of the roles and responsibilities required for managers” and allows them to “develop the skills required to succeed”.¹³⁷ This qualification is available for £1,300 for a part time, 12-month course requiring learners to attend college one evening per week for three hours¹³⁸ - a considerably cheaper way of achieving the same goal.

Other management courses suffer from the same profligacy. If the CMI’s Level 7 ‘Strategic Management & Leadership Practice’ qualification¹³⁹ is completed through the popular yet controversial Level 7 ‘Senior Leader’ apprenticeship discussed earlier in this report, training providers can draw down up to £14,000 of apprenticeship funding.¹⁴⁰ However, if a learner took this qualification outside of the apprenticeship system, it costs just £4,000 and only lasts for around 30-36 weeks¹⁴¹ (less than the minimum 12-month duration of an apprenticeship). Similarly, the Level 5 ‘Operations or Departmental Management’ apprenticeship standard costs £7,000 and is the fifth most popular ‘apprenticeship’ with over 47,000 starts since 2017/18. Meanwhile, outside of apprenticeships, the CMI Level 5 Extended Diploma in Management and Leadership “for practising middle managers and leaders at operations, division, departmental or specialist level”¹⁴² can be completed part-time over 18 months for just £1,750.¹⁴³

If one were to add the maximum amount of funding that could have been consumed by these three management ‘apprenticeships’ (Team Leader / Supervisor; Operations or Departmental Management; Senior Leader) since 2017/18, it comes to a total of over £1 billion. Given the above examples of how it is possible to deliver this training in a far more cost-effective manner, several hundred million pounds in apprenticeship funding may have been squandered by putting employees on these management and leadership courses at inflated prices. Even if improving management skills is a government’s chosen objective, the Richard

Review was correct in asserting that such training should be kept outside of the apprenticeship system to maintain value-for-money and protect the apprenticeship brand.

To understand why using apprenticeships for ‘upskilling’ is so attractive to employers even if it damages the apprenticeship brand, one only has to look at the financial dynamics of apprenticeship funding. Employers who pay the apprenticeship levy are incentivised to use up their own levy contributions as quickly as possible thanks to the two-year time limit on spending their contributions before they are handed over to the Treasury. This makes selecting costly management training and professional development courses aimed at existing staff a more effective strategy than offering cheaper lower-level apprenticeships aimed at new and younger recruits. Meanwhile, employers who do not pay the levy have essentially been given unrestricted access to 95 per cent subsidies for all these management ‘apprenticeships’, so it is no surprise to see them taking advantage of this opportunity as well.

Because of these inappropriate financial incentives, further examples of the misuse of apprenticeships for ‘upskilling’ are not hard to find. For instance, some Trailblazers have produced a higher-level standard in addition to their entry-level standard. This has created several ‘upskilled’ versions of entry-level apprenticeships:

- **Housing and Property Management** (Level 3 - £7,000 maximum funding) and **Senior Housing and Property Management** (Level 4 - £9,000)
- **Insurance Professional** (Level 4 - £9,000) and **Senior Insurance Professional** (Level 6 - £21,000)
- **Journalist** (Level 5 - £13,000) and **Senior Journalist** (Level 7 - £14,000)

Meanwhile, other Trailblazers have simply created a ‘manager’ role on top of the existing entry-level standards to create yet more opportunities to use up apprenticeship funding for upskilling their staff:

- **Children, Young People & Families Manager** (Level 5 - £6,000)
- **Hospitality Manager** (Level 4 – £6,000)
- **Leisure Duty Manager** (Level 3 - £5,000)
- **Marketing Manager** (Level 6 – £9,000)
- **Retail Manager** (Level 4 - £5,000)

These roles are evidently not entry-level positions and, just like the management training courses cited earlier, the value-for-money of these ‘apprenticeships’ is highly debatable given that they are seeking to provide experienced employees with additional skills rather than train them in entirely new occupations.

Recent government figures have only added to the concerns about how management training and professional development courses are undermining the apprenticeship brand. Over 40 per cent of ‘apprentices’ in 2020/21 had already been with their employer for over a year before they started their ‘apprenticeship’,¹⁴⁴ further demonstrating how pervasive the practice of drawing down levy funding for existing employees has become. A recent survey of levy-paying employers found that 36 per cent had used their levy contributions to upskill their existing workforce – almost the same proportion that had used it for recruiting and training new staff. In addition, 22 per cent had used it on training that would have happened anyway and 15 per cent had used it to accredit skills that existing employees already have.¹⁴⁵ Without concerted action from government on this issue, employers appear to have little interest in voluntarily moving away from the use of apprenticeship funding for ‘upskilling’ irrespective of the cost to taxpayers or future apprentices.

Apprenticeships that aim to ‘deskill’

It is not just at senior levels that employers’ desire to create extra standards within the same occupation has become a major problem. Many training courses for entry-level roles that would presumably meet the IfATE definition of an acceptable standard have been broken into separate lower-level standards (e.g. one standard at Level 2 and another at Level 3) – known as ‘vertical differentiation’. This approach reduces the expectations on apprentices and diminishes the quality of their training, as it creates an artificial stopping point for apprentices that does not (and, in many cases, should not) exist.

The Richard Review stated that this differentiation was theoretically acceptable, providing that the lower-level course:

“...reflects a real job, and one which requires a substantial level of training, but not solely as a stepping stone to a Level 3. Where there is a good case for having multiple levels within a single occupation, it is essential that there is no duplication between these.”¹⁴⁶

Although the Review cautioned against possible duplication between standards and weaker training courses at lower levels, there are several examples of vertical differentiation within the apprenticeship system that fall directly into this trap.

A prime example is the Level 2 Customer Service Practitioner standard, discussed in chapter 4. Not only has this report already shown how this standard should never have been approved due to a lack of training content and the absence of a clear occupational focus, but there is also a Level 3 ‘Customer Service Specialist’ standard that does a much better job of describing a genuine occupation requiring an extended period of training. According to this Level 3

standard, the main purpose of a Customer Service Specialist “is to be a ‘professional’ for direct customer support within all sectors and organisation types”¹⁴⁷ – precisely the level of skill and autonomy that an entry-level apprenticeship should always strive to deliver. The apprentice would be “dealing with more complex or technical customer requests, complaints, and queries”, acting as “an escalation point for complicated or ongoing customer problems” and being “an expert in your organisation’s products and/or services” as well as needing to gather and analyse data and customer information that influences change and improvements in service.”¹⁴⁸ This compares very favourably with the low-quality Customer Service Practitioner standard that only provides learners with a handful of basic skills such as meeting and greeting customers along with taking booking and payments.

Other examples of unwarranted ‘differentiation’ have been cited elsewhere in this report. The Level 4 Senior Housing and Property Management standard mentioned earlier in this chapter comes on top of a Level 2 ‘Housing and Property Management Assistant’ standard and also a Level 3 ‘Housing and Property Management’ standard. In contrast to the Level 2 version (which is a low-skill administrative role), the Level 3 standard “is customer facing and primarily responsible for the creation and sustainment of successful tenancies in the private and social rented housing sectors.”¹⁴⁹ In effect, the Level 2 role is merely a support function for those working at Level 3 – the industry benchmark. The Level 3 standard requires apprentices to perform more advanced and challenging duties:

*“The work is varied and often includes addressing complex people related matters (for example supporting people to live independently) as well as property related responsibilities. The role incorporates a degree of lone working with minimum supervision whilst predominantly working within the wider organisation and team, communities and external partners. Housing and property management professionals are proactive in finding solutions to problems and identifying areas for improvement. They take individual responsibility for the quality and accuracy of their work and its administration. At Level 3 some housing and property professionals may also have supervisory responsibility for other people.”*¹⁵⁰

As can be seen from this description, those qualified at Level 3 can perform complicated duties autonomously as well as take on significant levels of responsibility – making them more skilled, and thus more valuable employees within the housing sector. Again, this only emphasises the weak nature of the deskilled Level 2 standard.

The Level 2 ‘Recruitment Resourcer’ standard follows the same pattern, as this low-skill role mentioned in the previous chapter exists to provide ‘resourcing support to the recruitment function’ in an organisation instead of the apprentice learning how to carry out the recruitment themselves. It is only after completing the Level 3 ‘Recruitment Consultant’

standard that an apprentice will eventually learn to “identify and secure job opportunities within client organisations [as] they attract candidates and successfully place them in those jobs in return for a fee.”¹⁵¹

Allowing employers to deskill learners and lower the quality of apprenticeships – evident across numerous standards – is unacceptable for several reasons. First, the Level 2 versions of these standards are a clear breach of the IfATE’s requirements for every apprenticeship to represent a skilled occupation and to have sufficient depth and breadth in their training. Second, it is unfair – and arguably disingenuous – to attract a learner onto an ‘apprenticeship’, only for them to find that they never acquire the level of skill and knowledge needed to fully participate in their chosen industry. Third, an apprentice who is only qualified at Level 2 is likely to remain on a lower wage than an apprentice qualified to Level 3 – thereby hindering their labour market mobility and earnings potential (even though ‘securing long term earnings potential’ is another IfATE requirement for every apprenticeship standard). This wage penalty may be in the interests of employers, but it is certainly not in the interests of apprentices. Finally, the differentiation between standards means that employers and training providers can draw down two lots of apprenticeship funding for the separate Level 2 and Level 3 courses. This places an unnecessary strain on the finite pot of funding available for apprenticeships. Moreover, it undermines the value-for-money and integrity of the apprenticeship system – the exact opposite of what the Richard Review sought to achieve.

6. The importance of off-the-job training

The Richard Review was in no doubt about the value of learners receiving off-the-job training during their apprenticeship:

*“...evidence tells us clearly that off-the-job, and off-site learning, typically delivered by a third-party organisation rather than the employer adds value – it gives the apprentice safeguarded time away from their job to ensure they can do substantial training. It can give them a peer group of different apprentices and a wider perspective, ensuring that someone else other than their employer is inputting into the training which can add to transferability.”*¹⁵²

The Review observed that apprentices “valued having a balance between off-site education to learn skills and on-site application to achieve and embed them”,¹⁵³ alongside “sufficient work-based time to build experience.”¹⁵⁴ Nevertheless, it criticised the variable quality of off-the-job training being delivered through the apprenticeship frameworks, finding that “much of the time which apprentices spend ‘training’, is in fact spent with their assessor providing evidence of their ability to meet competency requirements.”¹⁵⁵

The Review recommended that in future, “some off-site learning typically involving a third party, and a minimum duration”¹⁵⁶ should be made mandatory. It argued that this would “reinforce incentives to deliver the best outcomes for the apprentice” and “may help guard against instances of poor employer practice and protect the interests of the learner.”¹⁵⁷ The Review was convinced that firm action was needed on this issue:

*“The Government should only support the cost of apprenticeships where the employer can demonstrate that they have invested in the apprentice for at least a year and that some of the training was done off-site. Off-site training, not just off-the-job, is important to specify because today, when training is on-site but off-the-job, this can often be hard to distinguish from normal on-the-job training and easily merges into the work and loses its value.”*¹⁵⁸

The Review also noted that “too often” the requirement for off-the-job training was limited to “self-guided learning, and provider-led assessment, with little meaningful training away from the burdens of day to day work.”¹⁵⁹ To overcome this, the Review suggested that off-the-job training “should require the involvement of a third party training organisation, unless the employer gets approved to deliver all their training themselves”.¹⁶⁰

Minimum requirements for off-the-job training

A year after the publication of the Richard Review, the Government released ‘*The Future of Apprenticeships in England: Implementation Plan*’. In response to the Richard Review’s emphasis on off-the-job training, the Government stated its aim of guaranteeing such training would be delivered in practice:

“In future, the amount of off-the-job training mandated will be a minimum of 20% or equivalent, but we expect this to be genuine off-the-job training. We will therefore explore ways of ensuring that this happens in practice as part of our Trailblazer development process, so that all apprentices benefit from genuine training away from their day-to-day job.”¹⁶¹

The formal requirement for 20 per cent of an apprentice’s working hours to be spent receiving off-the-job training was subsequently introduced in 2017 alongside the apprenticeship levy. Soon afterwards, training providers began to push back against this new rule. Then CEO of the AELP Mark Dawe called for the requirement to be “reconsidered in relation to each sector’s needs” rather than implementing what he argued was an “arbitrary” figure.¹⁶² Similarly, the CEO of Remit Training argued that the requirement was “inflexible and hard to enforce”, and that “in most cases we don’t need to do a full job of off-the-job training in a classroom.”¹⁶³ Some stakeholders even claimed that the requirement would make delivering apprenticeships ‘economically unviable’ for colleges and other training providers.¹⁶⁴

Off-the-job training remains a statutory requirement for apprenticeships in England. The type of learning or training each learner is doing is expected to be documented in the apprentice’s ‘Individualised Learner Record’ over the course of the programme. To qualify as off-the-job training, the Education and Skills Funding Agency (ESFA) – part of the DfE – state that the training must:¹⁶⁵

- Be directly relevant to an apprenticeship standard or framework;
- Teach new knowledge, skills and behaviour;
- Take place within the apprentice’s normal working hours
- Take place away from the apprentice’s normal work duties (although it may take place at the workplace)

Despite the Richard Review getting its wish on mandatory off-the-job training, the Government has recently changed the minimum requirement from 20 per cent of an apprenticeship to a baseline figure of six hours per week regardless of the hours worked by the apprentice. This change was made after the ESFA concluded that the 20 per cent rule

meant that apprentices working longer hours were potentially being unfairly impacted, as their higher working hours would result in a higher off-the-job training threshold. Nevertheless, the ESFA emphasised that this change “must not dilute the existing requirement to provide the right level of training to every apprentice”.¹⁶⁶

In practice, the six hours of weekly off-the-job training can include any of the following according to the latest government guidance:

- teaching theory (e.g. lectures, role playing, simulation exercises, online learning and manufacturer training);
- practical training, shadowing, mentoring, industry visits and participation in competitions (where the activity has been agreed and documented as part of the agreed training plan);
- learning support and time spent writing assignments.¹⁶⁷

The same guidance also sets out what off-the-job training *must not* include, such as time spent on initial assessments and onboarding activities, English and maths provision, ‘progress reviews’ and training outside of the apprentice’s normal working hours (unless the apprentice has been compensated through payment or time off in lieu).¹⁶⁸

Although these stipulations may appear comprehensive, there are numerous loopholes that leave apprentices exposed to poor practice and low-quality programmes. First and foremost, it has been left up to the training provider and employer to decide on how the apprentice’s time is divided between the permissible activities. For example, it is perfectly legitimate for a training provider to deliver large swathes on an apprenticeship through online learning regardless of whether an apprentice is happy with this arrangement. Some universities are now delivering Level 6 ‘degree apprenticeships’ entirely online through webinars, recorded lectures and online forums, with barely any face-to-face contact throughout the entire degree course. Apprentices are often unaware of this delivery model before they sign up to the course but are not given any choice in the matter once their training commences. According to the funding rules, it is also acceptable for an apprentice to use up a huge (and essentially unlimited) portion of their time off-the-job completing homework and other written assignments rather than receiving training. The extensive use of online learning and completing assignments as part of ‘off-the-job training’ are a direct contradiction of the Richard Review, which railed against the reliance on ‘self-guided learning’ under the previous apprenticeship frameworks.

Second, there is no mention anywhere in the off-the-training rules of *who* is supposed to deliver this training. The Richard Review stated that a training provider should be required to provide off-the-job training, but research for this report found countless job adverts for

apprenticeships that illustrate how little involvement some providers have in the ‘training’. As shown in the quotes below, the lack of restrictions around how much time an apprentice is left to complete ‘self study’ exercises or written assignments is creating an environment in which the minimal involvement of training providers is not just tolerated but widely accepted. These adverts also indicate that there is little enforcement of the rules that ban providers from counting ‘progress reviews’ towards off-the-job training hours:¹⁶⁹

- *“College contact will be once per month”*
- *“A [training provider] tutor will visit you every 4-6 weeks in your workplace.”*
- *“Delivered ...monthly by tutor in house, self-led study and blending learning... all within the workplace.”*
- *“...you will have regular site visits every six to eight weeks from your designated assessor, who will monitor your progress throughout your apprenticeship”*
- *“You will be given some of your working week ...to carry out self-supported study, compiling your portfolio or completing work set by your assessor”*
- *“The successful candidate will receive full training provided by the employer”*
- *“All the training ...will take place onsite with no college delivery.”*
- *“20% paid time out for self-study with some tutor support”*
- *“You will be taking part in 6 hours within the working week of off the job training which will take place online”*

Such job adverts go against the spirit and aims of the Richard Review and in some cases breach the DfE’s funding rules on off-the-job training, yet providers remain free to take advantage of the loopholes created by government. Regrettably, this further demonstrates how low a priority is attached within the funding rules to delivering a high-quality experience for every apprentice.

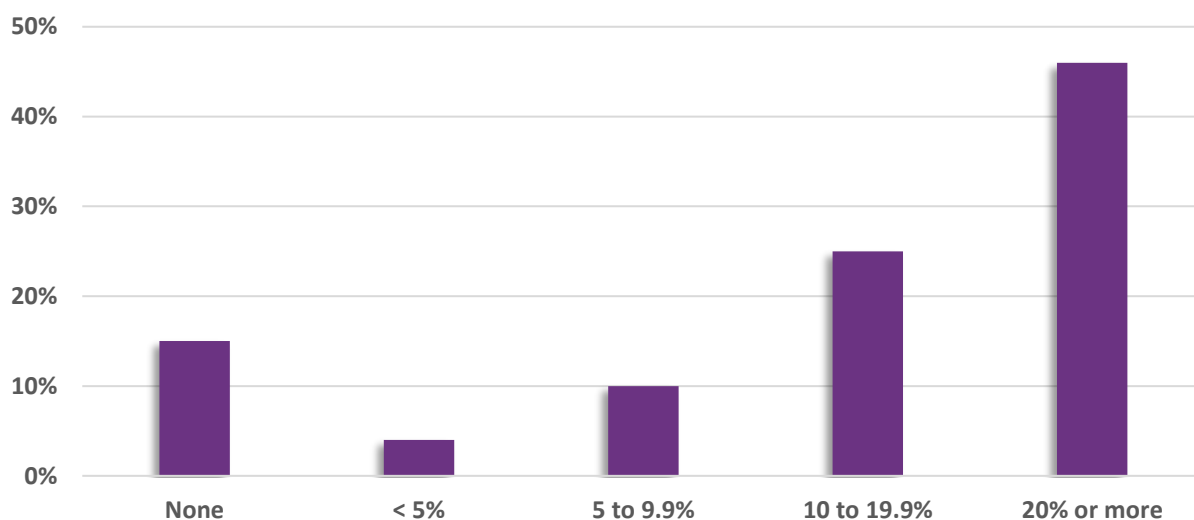
How much off-the-job training is taking place?

In truth, these lamentable job adverts are only the tip of the iceberg. Despite the explicit statutory requirement for 20 per cent off-the-job training in recent years, the Government’s latest survey of apprentices strongly suggests that there are still significant issues with compliance. One in five apprentices (19 per cent) are not even aware of the 20 per cent off-the-job training requirement,¹⁷⁰ even though it is supposed to be included in the apprenticeship agreement and subsequent training plan. This proportion rises to a third of learners (32 per cent) on Level 2 apprenticeships,¹⁷¹ and rises even higher for apprentices in the Leisure (38 per

cent) and Retail (35 per cent) sectors.¹⁷² This is likely to be related to the plethora of poor-quality ‘apprenticeships’ being delivered in these industries, as described earlier in this report.

The survey also collected information on the number of off-the-job training hours per week that apprentices were completing during their apprenticeship. As shown in Figure 3, only 46 per cent of apprentices reported that they received compliant levels of off-the-job training hours. Therefore, the majority (54 per cent) were not getting the minimum levels specified in the ESFA’s funding rules.¹⁷³ That almost one in six apprentices received *zero* off-the-job training hours is a damning indictment of the way that some employers and training providers are behaving. Once again, Level 2 apprentices fare even worse, with only 39 per cent receiving compliant levels of off-the-job training and one in five (20 per cent) receiving no training at all.¹⁷⁴ These dismal figures appear to be inflated by some employers delivering at least part of the required off-the-job training, because 30 per cent of apprentices report that they do not receive any learning or training from their college or training provider during normal working hours.¹⁷⁵

Figure 3: Percentage of reported working hours spent on off-the-job learning or training ¹⁷⁶



What’s more, existing employees receive less off-the-job training than those who were recruited new to their apprenticeship (41 per cent compared to 53 per cent).¹⁷⁷ This may be related to the misuse of apprenticeships for upskilling existing staff, as discussed in the previous chapter, with employers rebadging and relabelling these courses as an ‘apprenticeship’ even though they are nothing of the sort. This is another clear sign that management training and other upskilling courses are not appropriate for inclusion within the apprenticeship system because they are simply breaking the funding rules in many cases.

Independent research has confirmed that, rather than seeing off-the-job training as a benefit to apprentices, many employers instead view this requirement as “an unwanted burden”.¹⁷⁸ The Gatsby Foundation conducted research into how training providers put together and deliver off-the-job training as part of high-quality apprenticeship programmes, including interviews with apprenticeship managers, curriculum planners, employer liaison officers, employers and apprentices.¹⁷⁹ One interviewee indicated that “in some providers a form of administrative fabrication is taking place in order to achieve the requisite number of hours”:

“I’m not convinced that us, as a company, are doing what we should be doing if I’m honest. I’m not so sure that everybody is getting the 20% off the job. We’re having to try and be inventive, not fraudulent but inventive in how we’re doing it. We’re having to literally try and get them to record if they do something for 10 minutes because it needs to add up... So in theory when you work it out it works out at about one day’s training per week...”¹⁸⁰

Particular industry sectors seem to face more difficulties than others when it comes to meeting the off-the-job requirement. Nursery providers must maintain minimum staff-to-children ratios, meaning that off-the-job training was sometimes taking place “sitting in the corner of a room where small children were playing.”¹⁸¹ Furthermore, the research also heard that “employers don’t want to release staff for that length of time”¹⁸² and that they “just do not want to buy into that”.¹⁸³ This suggests that, despite the Richard Review’s emphasis on the importance of off-the-job training, many employers and training providers are ambivalent about whether the apprentice receives a high-quality experience or substantial training.

The Richard Review’s call for mandatory and lengthy off-the-job training was driven by the desire to “help guard against instances of poor employer practice”,¹⁸⁴ yet the evidence in this chapter had made it abundantly clear that poor practice remains widespread. Perhaps the most telling statistic from the Government’s latest survey of apprentices is that learners enrolled on the new apprenticeship standards were more likely than those on previous apprenticeship frameworks to have not done any off-the-job training.¹⁸⁵ This suggests that the last ten years of reforms have failed to stop some employers and training providers from ignoring their responsibilities to properly train their apprentices.

The quality of training providers

Given that off-the-job training is such an important element of an apprenticeship, it is paramount that the organisations providing this training are of high quality. The Richard Review argued that “Government has a role in promoting good quality delivery”¹⁸⁶ and that this would “best be done by insisting that, though we will not mandate how they train, we

will determine who can train.”¹⁸⁷ To “maximise value for learners and minimise risk of poor practice”,¹⁸⁸ the Review recommended:

*“...the Government should develop a simple and light-touch way of approving the institutions, employers or people entitled to deliver apprenticeship training, and that these decisions should be driven by whether this organisation is delivering good quality training, relevant to the needs of employers in that sector.”*¹⁸⁹

The Review also noted that the system in place at the time, in which provider approval was under the remit of the Skills Funding Agency (SFA) – the predecessor to the ESFA – did “not sufficiently take qualitative measures into consideration”.¹⁹⁰ It proposed that a different approach may be considered in future and suggested that, alongside their responsibility for inspecting training providers, Ofsted “could have a role in the approval of training organisations”.¹⁹¹

Despite the Review’s recommendations, the role of approving training organisations was given to the SFA. This was a curious choice, given that the SFA was a funding body with no expertise in making judgements about the capability and capacity of prospective providers. Regardless, this eventually led to the creation of a ‘Register of Apprenticeship Training Providers’ (RoATP) that was managed by the ESFA. From the outset, the RoATP aimed “to open up the market and increase competition and thereby to drive up value for money and quality.”¹⁹² The Government emphasised that the Register should focus on applicants’ capability to deliver high-quality apprenticeships, to be determined by passing “a range of tests in the areas of financial health, due diligence, quality, capacity and capability.”¹⁹³

Once training providers are registered and placed on the RoATP, they are then regulated by Ofsted who “inspect the quality of apprenticeship training that is delivered by training providers to ensure it is high-quality and meets the needs of employers and apprentices”.¹⁹⁴ The latest Ofsted annual report, published in December 2021, noted that there were almost 1,600 FE and skills providers delivering apprenticeships.¹⁹⁵ Of the providers who had been given a judgement on their apprenticeship provision, 81 per cent were judged ‘good’ or ‘outstanding’ at their most recent full inspection, or were judged to be making at least ‘reasonable progress’ at their New Provider Monitoring Visit (NPMV) – the brief interim inspections of providers who have just started to receive funding.¹⁹⁶

Despite this broadly positive picture, 24 per cent of new providers who received an NPMV were judged to have made ‘insufficient progress’ in at least one of four themes.¹⁹⁷ Moreover, 15 per cent of providers who received a Progress Monitoring Visit (PMV) – an interim inspection for new providers and those previously judged as ‘requires improvement’ or ‘inadequate’ – were found to be making ‘insufficient’ progress.¹⁹⁸ These figures suggest that

hundreds of training providers are failing to deliver high-quality apprenticeships. It is therefore no surprise to see regular media coverage of what Ofsted inspectors have found when they uncover substandard provision:

- Inspectors found that “too many” apprentices at ‘Waltham International College’ (WIC) had not heard of the provider and a “high proportion” said they “had not studied a course at the college”¹⁹⁹;
- Apprentices at England’s biggest apprenticeship provider, ‘Lifetime Training’, were found “too often” spending their own time completing their off-the-job training assignments at home outside of work hours²⁰⁰ (a clear breach of the funding rules);
- ‘Next Level Impact’ was criticised for not working “effectively” with employers to plan off-the-job training, with most apprentices having “struggled to complete their self-study off-the-job training hours”²⁰¹;
- At ‘ARC Academy UK Limited’, most apprentices were found to “not receive regular visits or feedback on their progress from assessors”, alongside trainers lacking “sufficient expertise in teaching”²⁰²;
- At Manchester University NHS Foundation Trust, none of the areas for improvement previously identified had been fully resolved and “leaders continued to recruit large numbers of apprentices, even though they knew they would be unable to meet all the requirements of an apprenticeship”²⁰³;
- At ‘The Opportunity Group’, “in too many cases” apprentices “do not receive sufficient time to complete their apprenticeship” in working hours and do not attend off-the-job training.²⁰⁴

Given the numerous instances of poor-quality provision identified by Ofsted, it is reasonable to question whether there is sufficient oversight of new and existing apprenticeship providers. Visiting new providers is a sensible step, yet this can occur up to 24 months after the ESFA had added a training provider onto the RoATP. Although these visits to new providers “determine the timing of the first full Ofsted inspection and, where necessary, any intervention action taken by the ESFA”,²⁰⁵ it means that no-one physically visits a new apprenticeship provider for up to two years because the ESFA process for joining the RoATP is purely administrative. The ESFA does not conduct on-site checks to verify the information on ‘financial health, due diligence, quality, capacity and capability’.

Moreover, after a training provider is placed on the RoATP, the provider is free to deliver whichever apprenticeship standards it chooses even though the skills, expertise and staffing required to deliver an apprenticeship will vary enormously depending on the level, sector and duration of the training. The ESFA previously noted that providers should “ensure

teaching staff are appropriately qualified with the necessary contemporary industry knowledge for the standard(s) being offered".²⁰⁶ Even so, they did little to enforce this beyond asking some related questions on the RoATP application form and offering voluntary 'development programmes' for a training provider's staff.

In 2018, the Education Select Committee in Parliament highlighted the flaws in the ESFA's operation of the RoATP. They observed that "the existence of a register which currently offers little guarantee of quality only serves to confuse and alienate some businesses" who want to recruit apprentices.²⁰⁷ The Committee also complained about the absence of a cap on the amount of training a new provider can offer before they have 'proved their competence', and proposed that such a cap should be instigated "until a new provider has received at least a monitoring visit from Ofsted and been found to be making sufficient progress."²⁰⁸

More broadly, the Committee was dismayed by the sheer volume of training providers that had been allowed onto the RoATP, adding that "it is absurd to create a system so bloated that it cannot be properly regulated."²⁰⁹ Their solution was for all new apprenticeship training providers to receive at least a monitoring visit from Ofsted within a year of being added onto the RoATP by the ESFA. The Committee recognised that "this would limit the number of providers, and the choice available to employers, as Ofsted will only be able to undertake a limited number of visits each year, but we do not think that is necessarily a bad thing."²¹⁰ Regrettably, the ESFA and the DfE largely ignored these suggested quality controls, meaning that some poor-quality providers will still only be identified months, if not years, after they begin recruiting large numbers of apprentices.

The limited checks on new providers extends beyond their initial registration on the RoATP and subsequent monitoring visit. Following the NPMVs, the first full Ofsted inspection of a new training provider – which lasts from two to five days – is then "scheduled within 24 months of the first monitoring visit".²¹¹ Providers receiving an 'inadequate' grade for overall effectiveness after a full inspection are removed from the RoATP, but these additional (and potentially) lengthy delays in the quality assurance process for new providers do not inspire confidence. This is not a criticism of Ofsted, but rather another indication that there is apparently little desire within government to ensure that apprenticeship provision is of a consistently high standard and that new providers have the capacity and capability to deliver high-quality apprenticeships.

Leaving aside the lack of oversight for new and prospective apprenticeship providers, existing providers judged as 'good' at their previous inspection may have a five-year wait until their next visit from Ofsted. Even a provider judged as 'requires improvement' will wait 12 to 30 months for a full re-inspection (albeit with a monitoring visit in the meantime), while providers judged as 'inadequate' are re-inspected within 15 months of their last full inspection

report and receive monitoring visits as well.²¹² Some of these gaps between inspections presumably reflect resource constraints within Ofsted, with only £20 million available for conducting ‘Further education and skills’ inspections last year (which includes other forms of education and training alongside apprenticeships).²¹³ That said, Ofsted’s budget is set by the DfE so the frequency and scale of inspections for new and existing provision is essentially determined by government. It is therefore ultimately up to ministers to decide if they wish to see greater progress in monitoring and improving the quality of apprenticeship providers.

Unsurprisingly, this minimal focus on quality assurance has led to several embarrassing incidents for the Government. The fastest growing apprenticeship provider in England was recently placed under investigation by the ESFA after it recruited more than 1,100 apprentices within eight months of joining the RoATP in March 2020.²¹⁴ The provider was originally incorporated as a small “freight company” in 2014 and had no training delivery history, yet this did not stop the ESFA from accepting it onto the RoATP.

To avoid similar episodes in future, the DfE announced last year that it would undertake a “full refresh” of the RoATP and would adopt “more stringent entry criteria for both new and existing providers, to better determine whether providers have the capability and capacity to be able to deliver these higher-quality apprenticeships”.²¹⁵ What’s more, the RoATP has been closed to new applicants since April 2020 and existing providers were told that they would have to reapply to remain registered.²¹⁶ Responsibility for overseeing the RoATP has also recently moved from the ESFA back to the DfE central team. Despite these well-meaning changes, it is hard to have confidence in the Government’s ability to identify weaker providers and prevent them from joining (and remaining on) the RoATP given that the Register has been ‘refreshed’ before to apparently little effect.

7. The role of employers

The previous chapter described why and how off-the-job training – largely delivered by external training providers – is a crucial component of any high-quality apprenticeship. Alongside this, on-the-job training – typically delivered by employers – is just as important, especially as most of an apprentice’s time is spent in the workplace. The Richard Review heard from apprentices that on-the-job training improved their apprenticeship experience because they valued a “balance between off-site education to learn skills, and on-site application to achieve and embed them” and it is “important to have sufficient work-based time to build experience.” Apprentices also valued “having someone to mentor them through their experience”.²¹⁷

In addition, the Review emphasised the importance of ensuring that there was a “clear and common understanding of what is expected” from the apprentice and the employer from the outset.²¹⁸ It called for employers and apprentices to “come together at the beginning of the apprenticeship and sign an agreement”, which should “spell out the training that will be delivered, by who and where, and the time off work allowed for this.”²¹⁹ The Review acknowledged that in some cases this was already taking place, but emphasised that “going forward, it needs to be a routine part of the approach”.²²⁰ The Review recognised that this “might be best facilitated at sector level by employer-led bodies – such as trade associations or industrial partnerships – or at local level.”²²¹

Furthermore, the Review suggested that better quality training should increase demand for apprenticeships in future because “learners will be more attracted if they consistently believe that they are receiving a worthwhile experience that leads to meaningful jobs and job opportunities.”²²² Emphasising the role that employers must play in delivering high-quality training, the Review observed that:

*“...good quality training depends not just on robust standards, empowered employers and robust learners; it also depends on investing in the capacity of good quality trainers and training organisations, whether they are in colleges or training organisations or within employers themselves.”*²²³

The ‘information gap’ facing apprentices

Potential applicants need to have access to extensive information about any education or training programme that they are considering, be it an academic or technical course. This is already the case for A-levels and university degrees, as applicants can access detailed

information about individual topics and modules and what will be studied within them. Providing such information assists candidates in making an informed decision about which programme to pursue and also helps to avoid possible mismatches between candidates and courses.

It is therefore both concerning and regrettable that many apprentices receive limited information, if any, about their training programme before signing up to an apprenticeship. Recent research from the Learning and Work Institute (L&WI) found that “almost all interview participants had minimal understanding of what the apprenticeship would entail” before starting their training programme.²²⁴ Apprentices who were informed about the opportunity by their employer tended to have even less of an understanding of what training would be provided during their apprenticeship. The information that was provided in advance tended to involve “the quantity and frequency of assessments or the number of days spent with the employer and training provider” but there was often “a lack of detail about the training content”.²²⁵

There have been some attempts to close this ‘information gap’ facing many apprentices. Once a learner has signed up to an apprenticeship, an ‘apprenticeship agreement’ is signed by the apprentice and the employer at the outset – as proposed by the Richard Review. This agreement outlines the standard being embarked on, the dates during which the apprenticeship is expected to take place and the amount of off-the-job training that the apprentice will receive.²²⁶ A ‘training plan’ is also required, which is supposed to describe the training (including the volume of off-the-job training) that will be delivered and how the apprentice, employer and provider will support the achievement of the apprenticeship. This includes a brief description (2-3 sentences) of the frequency and mode of delivery of the training, alongside the planned content / units of delivery among other details.²²⁷

The apprenticeship agreement and training plan should theoretically give apprentices a better sense of what their training will entail, but there are major limitations with this approach. First and foremost, apprenticeships do not come with a ‘curriculum’ that states in detail what an apprentice will learn during their programme. As noted earlier in this report, training curricula are an essential part of apprenticeships in other countries. In Germany, the content of every apprenticeship is set out in a ‘framework curriculum’ to “guarantee a uniform national standard”.²²⁸ The curriculum includes a list of modules, the objectives for each module, the module content and the suggested time allocation for every module in every year of the training programme. Not only is this used for careers advice and guidance in schools, but it also clarifies what employers and training providers must deliver over the course of the apprenticeship.

Because there is no curriculum attached to apprenticeship standards in England, an apprentice has no point of reference for what training they should be receiving or what topics their apprenticeship should cover. Furthermore, the training plan only offers a summary of what is expected to take place during the apprenticeship. The Government's own template version of a training plan merely notes that the training provider should "agree with [the] employer and apprentice the level of detail required (e.g. modules, topics, weeks)."²²⁹ As a result, there is no consistency for apprentices in terms of what information they will be given about their training programme and it is perfectly acceptable for a training plan to just state the title of a unit or module without any information about its content or subject matter. What's more, the level of accountability attached to these training plans is limited because, in the absence of a proper curriculum, there is no national standard against which to hold employers to account for what they deliver (or do not deliver).

Perhaps the greatest risk posed by the absence of training curricula is that 'firm specific' training may begin to seep into an apprenticeship, thereby undermining the national standards demanded in true occupations that apply across the country. The Richard Review was in no doubt about the need to prevent this from happening:

*"...training that is firm specific – for example training to understand internal systems or processes - should be fully funded by the employer. Such activities do not, in general, add to the individual's marketability in the labour market, and are largely not reflected in higher wages – the employer is the main beneficiary in terms of enhanced productivity."*²³⁰

When the loose requirements around apprenticeship agreements and training plans are combined with the poor-quality standards displayed in earlier chapters, there is a very real prospect of employers using 'apprenticeships' to simply train staff to work in their own workplaces and establishments rather than training them up to an agreed national standard. In addition to being a waste of apprenticeship funding, firm-specific training could also leave apprentices without the skills and knowledge they need to participate fully in their chosen occupation as a skilled and valuable employee and subsequently progress in the labour market. However, without a training curriculum in place for each apprenticeship that shows apprentices exactly what they should be learning, there is little that can be done to prevent such undesirable practices.

To illustrate why the minimal overall quality requirements placed on employers is such a problem, the Government's latest survey of apprentices shows that one-in-five (19 per cent) are not receiving *any* on-the-job training from their employers during normal working hours.²³¹ In terms of which apprentices did not receive training as part of their normal day-to-day work duties, those on Level 2 apprenticeships (26 per cent) and those enrolled in 'Leisure'

apprenticeships (31 per cent) fared worst²³² – very much in line with the low-quality standards described earlier in this report, particularly in the hospitality sector.

Furthermore, around one in twenty learners (6 per cent) are unaware that they are even on an apprenticeship and a further 3 per cent are ‘unsure’.²³³ Awareness levels are even lower among apprentices who were working for an employer before starting their apprenticeship (86 per cent).²³⁴ Moreover, one in ten (9 per cent) apprentices reported that the main reason they started their apprenticeship was because their “employer said they had to”, rising to 22 per cent of Level 6+ (non-degree) apprentices.²³⁵ The L&WI research cited above found two instances in which apprenticeships were “compulsory, since the apprenticeship came with the job role”.²³⁶ One apprentice was told they had to enrol on an apprenticeship to continue with the job role they applied for, while another applied for a ‘team leadership’ role within a company and “didn’t expect the apprenticeship to be attached.”²³⁷ Such instances, plus the lower levels of awareness among some existing employees that they are on an ‘apprenticeship’, raise further questions about whether employers and training providers offering management training and other ‘upskilling’ courses to current employees are complying with the funding rules.

Evidently there is still a long way to go to meet the Richard Review’s requirement that every apprentice and employer has a ‘clear and common understanding’ of what is expected of them. Too many apprentices remain unaware of the training that are supposed to receive, to the extent that some are oblivious to the fact that they are even on an apprenticeship. This lack of clarity around the training content of apprenticeships leaves current and future learners at risk of receiving a poor-quality experience because they are left in the dark about what they are supposed to learn – something that would never be tolerated for academic courses and qualifications such as university degrees or A-levels. The IfATE has previously offered employers the opportunity to develop a ‘specimen training plan’,²³⁸ but the lack of demand for such initiatives is indicative of the lack of interest among many employers in guaranteeing that apprentices receive a high-quality programme.

The quality of on-the-job training

Needless to say, there are many examples of good practice taking place within employers. A small-scale research study by the Gatsby Foundation looked at the extent, content and nature of on-the-job training received by Level 2 and 3 apprentices across Engineering and Construction, Retail, Social Care and Digital sectors. Among the Engineering, Construction and IT employers interviewed, high quality on-the-job training was indeed being provided. For example, the on and off-the-job training offered by construction employers was usually

closely aligned, allowing the apprentice to apply the knowledge they gained off-the-job in the workplace. Many employers developed their own in-house training plans:

*“...what we try to do is base what they are doing [on site] around what they are doing on their day release at college. If they are looking at brickwork for example, I will make sure that [the apprentice] is helping on the brickwork package...”*²³⁹

The study found that the main elements of on-the-job training were mentoring and shadowing, which involved the apprentice working alongside a trainer or senior worker, observing or assisting them. Mentoring was seen as “crucial in ensuring apprentices became fully proficient in a wide range of skills”.²⁴⁰ The “gradual transition from novice to expert”²⁴¹ was deemed essential, with employers stressing that it was vital apprentices reached a certain level of knowledge and skills before being expected to work independently. One Engineering technician/trainer told the interviewers:

*“I think they need to get themselves to a certain level before they can be let loose to work on stuff on their own [...] I do a lot of engine rebuilds, diagnostic work and servicing as well [...] so if I give something to [the apprentice] I need to be 100% sure that he’s capable so I haven’t got to go back to it and rectify issues.”*²⁴²

What’s more, apprentices in these workplaces were not expected to be fully productive during their apprenticeship. Employers saw the training they provided as a vital investment, with one manager from an Engineering firm stating that they would “maybe” look at an apprentices’ productivity and efficiency in the “latter part of the second year” but that it would only be for the employer’s own benefit to check the apprentices’ progression.²⁴³

Despite such examples of effective on-the-job training in some sectors, the evidence suggests this is far from universal. Apprentices on social care and retail apprenticeships were seen as “first and foremost fully productive workers rather than learners.”²⁴⁴ Consequently, employers saw their responsibility mainly in terms of line-managing apprentices, such as ensuring they were given sufficient time to work on their apprenticeship and acting as a point of contact.²⁴⁵ When asked whether they had a training plan in place, a store manager of a national retailer appeared to believe that this was exclusively the responsibility of training providers, stating “that’s set by the trainers really”.²⁴⁶

It also became apparent that apprentices in retail and social care were expected to take responsibility for seeking out their own learning opportunities, rather than shadowing or being mentored. The interviewers were told by a Learning and Development Manager at a regional retailer that there was an emphasis on “empowering apprentices to understand that the apprenticeship was very much a self-driven thing”.²⁴⁷ Even so, the study found that there

was generally a lack of time for apprentices to seek opportunities for on-the-job learning because of the pressures of day-to-day work.²⁴⁸ What's more, in the social care sector it was not always seen as inappropriate for such training to occur. Representatives from both social care employers involved in the study explained that it was "not acceptable practice" to train staff in the presence of vulnerable service users:

*"...it's not very dignified for the person [...] you can't do that because for them to be able to do the job well they need to have the training [before they start working]. And it's not suitable to do the training and work at the same time, you just can't."*²⁴⁹

Rather than being seen as a learning experience, viewing apprenticeships as a means of assessing existing skills was common across the social care sector. A home care provider apprentice mentioned that on home visits, the trainer was "always like assessing us as well when she's working with us, observing us [...] so there's that advice there for afterwards for the next time rather than on the spot".²⁵⁰ Most apprentices in the large residential care provider that took part in the study were existing staff who had been with the employer for a while, and were therefore expected to work independently. Similarly, new recruits with prior experience as care workers were not deemed to require any training but simply needed their existing skills assessed.²⁵¹

This research study went on to reach a startling conclusion:

*"Our research suggests that there are a group of employers who are only minimally invested in apprenticeships. In the worst cases, there is a sense that an apprenticeship provides the employer with a continuous stream of cheap labour. On-the-job training goes little further than basic induction. ...not all employers can or should be offering apprenticeships"*²⁵²

Even those employers who were at least partially engaged with on-the-job training "did not appreciate the full training potential of apprenticeship, or how critical their own role is in making the apprenticeship high quality."²⁵³

It would be wrong to assume that these sectoral case studies are isolated incidents. The Government's latest survey of apprentices found that nearly one in five (19 per cent) rated the support from their employer as 5/10 or less.²⁵⁴ Construction apprentices were the most satisfied with their employer support, and Retail apprentices the least.²⁵⁵ Similarly, 23 per cent of apprentices rate the balance between time learning and time working as 5/10 or less.²⁵⁶ Once again, Construction apprentices were the most satisfied with their balance between learning and working along with Engineering apprentices, while Retail and Health apprentices were the least satisfied.²⁵⁷

Worryingly, the quality of work experience and support offered by an employer contributes to whether an apprentice withdraws from their apprenticeship. The L&WI found that interviewees who had already withdrawn felt that their work experience and support from their employer were of poor quality. Similarly, those who withdrew from their apprenticeship “typically perceived their employers as prioritising their employee role over their apprenticeship requirements”,²⁵⁸ and felt that employers were “inexperienced with apprentices”²⁵⁹ or did not offer them with sufficient opportunities to develop their skills.

An international perspective on quality assurance

On-the-job training from employers must always be of a high standard to ensure that apprentices receive a high-quality experience. It is therefore concerning that, while training providers are subject to inspections from Ofsted, the on-the-job training that an apprentice may receive from their employer is not subject to any formal quality assurance aside from the training provider monitoring the apprentice’s progress.²⁶⁰ The lack of monitoring associated with on-the-job training makes England an international outlier. A recent review of apprenticeships in England by the OECD highlighted this issue:

*“England is unusual, both relative to other countries, and relative to the historical tradition of apprenticeship, in imposing very few training obligations on employers that take apprentices. This leaves the traditional heart of apprenticeship – training provided in the workplace by an employer – in a marginal position, as it is not subject to regulatory standards. While employers commonly (although certainly not invariably) do train their apprentices, formally and informally, much of this takes place outside of the regulated structure of the apprenticeship system.”*²⁶¹

The OECD noted that the role of providing work-based learning is taken seriously in many countries across Europe and beyond, to the point where there are often strict requirements on any employers who wish to take on an apprentice:²⁶²

- In Germany, employers offering apprenticeship are described as ‘training employers’ as they must meet a set of training requirements before taking on an apprentice.
- Employers in Norway offering apprenticeships must be approved as ‘training organisations’ before they can recruit apprentices.
- In Switzerland, there are requirements in terms of the qualifications and training of apprentices’ instructors in the employer, as well as regulations around how and where specific skills should be developed. In addition, companies have access to a checklist of 28 quality criteria used to self-assess the quality of in-company training and identify areas for improvement (known as the ‘QualiCarte’).

- Any company offering apprenticeships in the Netherlands must be ‘accredited’. Accreditation criteria includes supervisors being appropriately trained and qualified and the company collaborating with the school providing off-the-job education and training.
- In Canada, employers are required to identify a certified journey person to supervise an apprentice during their training.

In addition to the checks on employers who wish to take on apprentices, other countries have also placed requirements on the managers who support apprentices in the workplace. These managers are often trained specifically to work with apprentices, and such training is typically mandatory.²⁶³

- In Germany, those who supervise apprentices and do not have an advanced vocational education and training qualification must first pass a ‘trainer aptitude’ exam. To prepare for the exam, candidates typically attend ‘Training for trainer’ courses, provided by the Chambers of Commerce and normally lasting 115 hours. In the exam candidates demonstrate their ability to assess educational needs, plan and prepare training, assist in the recruitment of apprentices, deliver training and prepare apprentices to complete their training.
- In Switzerland, apprentice supervisors are required to complete a targeted training programme in addition to having a vocational qualification and at least two years of relevant work experience. Courses are offered in two formats, leading to different qualifications (a 40-hour course or a 100-hour course). The training covers information about the Swiss vocational education and training system, vocational pedagogy and how to potential problems young people may face (e.g. drugs, alcohol).
- In Norway, optional training is offered to employees involved in supervising apprentices. Typically, the training last for two full days (or four half days) per year. Participants learn how to cover the curriculum, complete evaluation procedures and administrative forms, prepare training plans for apprentices and subsequently deliver the training plan.

These requirements are not idle regulations. On the contrary, evidence from Germany showed that the temporary suspension of compulsory training for apprentice supervisors was associated with higher rates of apprentices dropping out as well as more complaints from companies about apprentices’ performance. As a result, mandatory training for supervisors was reintroduced in 2009 after six years of being suspended.²⁶⁴

The importance of work-based learning within apprenticeships in England has been a glaring omission in the policy landscape since the Richard Review was published a decade ago. While

some employers clearly do provide work-based learning, these are “possibilities rather than obligations on employers”.²⁶⁵ Aside from apprenticeships having to be offered in ‘genuine jobs’ (which, as this report has shown, has proved to be an inadequate safeguard), there are effectively no regulations on employers in relation to the training that they deliver unless they are employer-providers or subcontractors.²⁶⁶ The OECD argued that the absence of regulations seeking to monitor and improve on-the-job training meant there was “a real risk a significant proportion of apprenticeships will involve the exploitation of apprentices as unskilled labour.”²⁶⁷

Having regulations and standards for training apprentices in the workplace would, at the very least, provide some reassurance to apprentices that their willingness to work for low wages is worthwhile because they will “have an opportunity to develop a wide range of skills”²⁶⁸ As the Richard Review argued, high-quality training from employers would also help to attract more learners to apprenticeships if they believe that they will receive a meaningful experience that leads to meaningful job opportunities in future. Regrettably, at present, thousands of apprentices are clearly receiving a poor-quality experience that could end up deterring more learners than it attracts.

8. Recommendations

The introduction to this report set out the aims and objectives of the Richard Review in relation to the quality of apprenticeships in England. As the evidence presented throughout the report has shown, the reforms enacted since 2012 have failed to deliver many of the Review's objectives, and in some cases may have made the situation even worse. This disappointing outcome has been reached because three fundamental weaknesses in the apprenticeship system have still not been addressed ten years after the Review's publication:

1. The downsides of 'employer led' apprenticeships

The singular focus on promoting an employer-led apprenticeship system over the last decade has given employers the opportunity to determine the content and size of every apprenticeship. However, this has occurred in the absence of sufficient checks and balances to prevent employers prioritising their own narrow interests over the need to build rigorous and substantial training programmes. Worse still, the unwarranted flexibility afforded to employers in how they define an 'apprenticeship' is in direct opposition to the goals of the Richard Review. The failure of the IfATE to subsequently enforce their own definition of an 'apprenticeship' has compounded these problems, with some employers continuing to rebrand low-skill roles as apprenticeships as well as generating fictitious job titles to access apprenticeship funding. As a result, employers have been allowed to produce an array of standards at both lower and higher levels that do not meet the IfATE's criteria for being recognised as an 'apprenticeship', yet they have nevertheless been approved and reapproved on numerous occasions.

2. Failing to prioritise the needs of apprentices

The importance of ensuring that every apprentice receives a high-quality training programme has been given too little consideration over the last decade. Even before a prospective apprentice starts their programme, the lack of detailed information about the training that they should receive during the apprenticeship limits their ability to make a fully informed decision before signing up – creating an unnecessary 'information gap'. In addition, the absence of details about the training content of an apprenticeship raises the prospect of either the employer or training provider (or both) not delivering the skills and knowledge required by learners to succeed in their chosen occupation, and there is little an apprentice can do to hold them to account in such instances. Unfortunately, many employers and training providers are simply not fulfilling their duties to deliver sufficient high-quality on- and off-the-job training (some do not provide any training at all). As a result, tens of thousands of apprentices every year are still not receiving challenging, deep or broad experiences during their programme.

3. Inadequate oversight and quality assurance

The division of quality assurance duties across several organisations has created a confusing landscape. The ESFA - a funding body with no expertise in training provision or on-site inspections – was given responsibility for determining which providers are approved to deliver apprenticeships, yet the ESFA’s processes for assessing providers were repeatedly found wanting. Ofsted can inspect the delivery of training by providers, but a lack of funding from central government means there can be significant delays in inspectors visiting both new and existing providers. Unlike in other countries, there is also no mechanism for checking whether employers can provide a high-quality training programme before they start recruiting apprentices. In addition, there is minimal support available to employers to help them improve an apprentice’s training and overall experience. More broadly, due to their excessive focus on listening to employers, the IfATE has not done enough to involve other stakeholders who could support the drive for better quality apprenticeships, particularly apprentices and social partners.

Any of the issues listed above would represent a problem in their own right. When combined, these issues leave little doubt that monitoring and improving the quality of apprenticeships has not been taken seriously by politicians and policymakers since the Richard Review was published (and potentially even before then). It is particularly disheartening that the best interests of apprentices have become such a low priority, even when the dropout rate has reached almost 50 per cent. The following recommendations aim to address the weaknesses in the apprenticeship system described above, with the aim of making sure that every current and future apprentice can access the high-quality training that they need and deserve.

Creating a better experience for apprentices

RECOMMENDATION 1

The Government should publicly restate its commitment to the Richard Review’s definition of what constitutes a high-quality apprenticeship that benefits learners as well as employers. Any ‘apprenticeship’ that does not meet this definition should be immediately banned from accepting new apprenticeship starts and fully withdrawn by 2024.

To achieve the Richard Review’s goal of a world-class apprenticeship system in England, the most obvious starting point is the principles set out by the Review itself ten years ago. As described throughout the analysis in this report, the Review left little room for doubt about its diagnosis of the previous problems with the quality of apprenticeships. In almost every case, it also described concisely what needed to be done to resolve these problems in a way that put the needs of apprentices alongside those of employers, government and society more broadly. The Review carefully laid out the types of training which were clearly identifiable as genuine apprenticeships based on their core features. Conversely, those training courses that

did not represent genuine apprenticeships were highlighted and swiftly dismissed as being inappropriate for inclusion within the future apprenticeship system.

It is therefore immensely frustrating that a decade later, the diagnosis of the problem remains just as valid. Low-skill low-wage roles are still being passed off as ‘apprenticeships’ so that employers and training providers can access the available funding for apprenticeships, as are training courses aimed at giving existing employees an additional set of skills. Despite the enormous value that genuine off-the-job and on-the-job training can add to an apprentice’s experience, some employers and training providers remain entirely disinterested in providing these crucial elements of an apprenticeship and in some cases openly flout the Government’s rules on this matter. Meanwhile, the Government seems unconcerned by the sheer scale of employers and providers offering substandard training to their apprentices.

The first step in fixing a policy problem is admitting that you have one. Thus, the first recommendation made by this report is for the Government to publicly state that it will adhere to the principles and objectives in the Richard Review in relation to the quality of apprenticeships in England, which means putting the interests of apprentices alongside the interests of employers at all times. Any ‘apprenticeship’ that fails to meet the various quality benchmarks set by the Review should have an immediate ban placed on new recruits, and if those same ‘apprenticeships’ are not redesigned to meet the Review’s quality benchmarks within the next two years then they should be abolished entirely.

RECOMMENDATION 2

To create a common and transparent understanding of the training programme that apprentices will receive, employers should be required to produce a ‘training curriculum’ for each apprenticeship standard from 2024 onwards. The curriculum (designed in collaboration with Awarding Organisations and training providers) will set out a complete list of the content, tasks and activities that will be delivered to learners over the course of their apprenticeship.

The experiences of apprentices working towards the same apprenticeship standard can vary enormously depending on the approach that individual providers and employers wish to take for each learner. This opacity over the training programme contributes to the ‘information gap’ that learners face when applying for apprenticeships and creates inconsistency in terms of what apprentices are learning. Furthermore, by allowing employers and training providers to produce their own content for each apprenticeship, it is much harder for apprentices, government ministers and external inspectors to hold them to account for the quality of their delivery because there is no formal record anywhere of exactly what the apprentice needs to be taught during their programme.

As the Richard Review emphasised, if the aim is to create a system that consistently delivers high-quality training, there must be a clear and common understanding of what is expected from the employer and provider from the outset – as is the norm in many other countries. This report recommends that once an apprenticeship standard has been approved (or is due for review in the case of existing standards), Trailblazer employers should be required to produce a detailed, logical and coherent training curriculum for each standard. Each curriculum should include the following information:

- **Module titles:** a list of modules that must be taught during the apprenticeship;
- **Training content:** the content within each module that the apprentices will need to cover, including a full list of all the topics and subject matter that will be taught as well as the tasks and activities that must be completed by the apprentice;
- **Time allocation:** the amount of time that needs to be allocated to each module to cover it in sufficient detail;
- **Outcomes:** what the apprentice will be able to do after completing each section of the curriculum (based on the skills, knowledge and behaviours set out in the standard).

By forcing employers to specify what will actually be learnt on the apprenticeship, they will no longer be able to put forward misleading, generic or obscure job titles that do not relate to genuine occupations (e.g. Senior Leader; Customer Service Practitioner; Accountancy / Taxation Professional). This will help eliminate ‘fake apprenticeships’ from the IfATE’s list of standards, and in doing so it will protect the interests of apprentices by creating complete transparency (both before and during their apprenticeship) in terms of the training programme that they will receive.

There is a reasonable case for providing some central funding (e.g. £5,000 or £10,000) to develop each curriculum, especially as this task may take several months and will require the incorporation of expertise from various sources. Assessment Organisations would be strong candidates for taking the lead on these matters, under the direction of Trailblazer employers, as it is not sensible to expect employers themselves to produce a curriculum of sufficient scope and detail to meet this new requirement. Drawing on the content of existing qualifications and training programmes in each occupation would nevertheless be an obvious starting point for each curriculum. To reflect the time and deliberations needed to design and agree a training curriculum, these new curricula should be provided by Trailblazer employers alongside every apprenticeship standard submitted for approval or reapproval from January 2024 onwards.

RECOMMENDATION 3

To ensure that all apprenticeships are for skilled occupations and roles that require at least 12 months of training (as specified in the existing funding rules), every new training curriculum must include a minimum of 300 hours of off-the-job training in every year of the apprenticeship.

As the ESFA already stipulates that apprenticeships at all levels must include a minimum of six hours a week of off-the-job training, this requirement should be reinforced within the new training curricula to deliver high-quality programmes for every standard. Six hours a week over the course of a full academic year is roughly equivalent to 300 hours of training. On that basis, every training curriculum should have to demonstrate that it meets this 300-hour threshold.

Formalising the minimum acceptable level of off-the-job training in this manner will ensure that all apprenticeships meet the IfATE's requirement for being 'sufficiently skilled in terms of breadth and depth' to require at least a year of training. In addition, it will satisfy the direct instructions from the Richard Review and the Sainsbury Review – both of which were adamant that training programmes with insufficient content should be excluded from the apprenticeship system.

RECOMMENDATION 4

To prevent any employer or provider from ignoring their responsibilities to offer genuine training to every apprentice, a minimum of 200 hours out of the new 300-hour annual training curriculum must be delivered face-to-face. Any time spent by an apprentice completing homework or other assignments will also no longer be counted as 'training'.

Regrettably, the evidence presented in this report shows that many employers and providers are not delivering high-quality apprenticeships. This is due, at least in part, to the lax rules around what counts as 'training'. Allowing providers free rein over how much online 'self-guided' learning they utilise and how much time an apprentice is left sitting at a computer completing written assignments has resulted in many apprentices receiving an unacceptably small amount of genuine training. The Richard Review found that in far too many instances, "little meaningful training" was being delivered to apprentices by their provider, yet the same situation remains evident a decade later.

Expecting an apprentice to complete their course predominantly, if not entirely, online without any direct instruction is an appalling distortion of the entire notion of 'training' and should not be tolerated by government. That a training provider is entitled to count an

apprentice completing a homework task or written assignment by themselves as ‘training’ only makes matters worse because it is not training in any meaningful sense. Just like the potentially excessive usage of online learning, classifying written assignments as ‘training’ allows poor-quality providers to abandon apprentices for weeks, if not months, on end without any direct instruction or teaching. Not only is this a clear breach of the Richard Review’s objectives, but it is also likely to be a significant contributor to the poor experience of many apprentices.

Given the enormous cost savings that an unscrupulous provider can realise by offering little or no face-to-face training, it is not appropriate to leave all decisions about how to deliver an apprenticeship to these same organisations. On that basis, new restrictions are urgently needed to prevent a poor-quality provider from exploiting the unjustified flexibility in the rules around off-the-job ‘training’. This report proposes that of the 300 hours of annual training set out in the new apprenticeship curricula, a minimum of 200 hours must be delivered face-to-face by the training provider. This will help strike a balance between providers being able to draw on the benefits of online learning for delivering some content while preventing training providers from ignoring their obligation to deliver a high-quality programme to every apprentice. What’s more, any time spent completing homework or written assignments should no longer be considered off-the-job ‘training’ and should therefore not count towards the 300 hours of training that all apprentices will receive. As with the new requirement for at least 200 hours of face-to-face delivery, this change in the regulations is intended to protect apprentices against the risk of a provider failing to offer any genuine training.

Creating a better system for delivering apprenticeships

RECOMMENDATION 5

To build an apprenticeship system that benefits learners, taxpayers and wider society as well as employers, the Institute for Apprenticeships and Technical Education (IfATE) should be redesigned as a collaborative partnership that is guided by the views of its main stakeholders and beneficiaries.

While the IfATE was set up with the best of intentions, the evidence in this report shows that they have been unable to act as guardians of apprenticeship quality and seem to have facilitated the continued existence of many apprenticeship standards that should never have been approved in the first place based on the IfATE’s own criteria. It is hard to understand why the Richard Review has been so frequently and resoundingly ignored, particularly when it explicitly warned of the damage that would be done to the apprenticeship brand if the quality of training was not prioritised in future.

Sweeping away the IfATE in its entirety would be an overly extreme response to these problems, but the problems will evidently not resolve themselves. The serious ongoing weaknesses with the quality of apprenticeship standards reflects the IfATE's desire to listen to employers rather than holding wider conversations about the quality, rigour and appropriateness of various training pathways and qualifications. To begin unwinding these shortcomings, the IfATE should be recast as a body that brings together the views and interests of all stakeholders – not just employers. It is only by making the apprenticeship and technical education system a shared endeavour that improvements in the quality of training can be sustainably delivered. To this end, this report recommends two major changes to the way that the IfATE operates.

Governance: To turn the IfATE into a credible and respected organisation, it must represent a wide selection of voices. It is therefore proposed that the IfATE's Board should be reconstituted so that it reserves one place for a senior representative from each of the following organisations (in addition to the IfATE's Chair and Chief Executive):

- The Confederation of British Industry (CBI)
- The Institute of Directors (IoD)
- The Federation of Small Businesses (FSB)
- The British Chambers of Commerce (BCC)
- Make UK
- The Trades Union Congress (TUC)
- The Association of Colleges (AoC)
- The Association of Employment and Learning Providers (AELP)
- Universities UK (UUK)

In addition, the Board should have places reserved for two or three leading academics to ensure that the research community is visibly represented in the IfATE's activities and that research evidence from this country and abroad informs their discussions. In future, the Board will take responsibility for appointing the Chair and Chief Executive of the IfATE in addition to overseeing its work across the apprenticeships and technical education system.

Route panels: The IfATE's 15 route panels (which only include employers) review and approve apprenticeship standards but, given how many standards do not meet the IfATE's definition of an 'apprenticeship', these panels appear unable to protect the quality of apprenticeships or the interests of apprentices. Consequently, it is proposed that all 15 panels should include the following individuals in addition to their employer-based members:

- Two former apprentices from that sector / pathway
- Two employee representatives put forward by social partners
- Two training provider representatives
- One academic or researcher

The inclusion of these individuals is intended to inject a more balanced and rounded view of training quality, particularly when it comes to judging the new training curricula that Trailblazer employers will be putting forward to the Route Panels. The evidence in this report strongly suggests that without incorporating these additional perspectives, there is little hope of producing more high-quality standards and removing poor-quality ones in future.

RECOMMENDATION 6

As part of a new drive to improve the quality of off-the-job and on-the-job training, the Government should hand responsibility for approving and inspecting apprenticeship providers to a new body: the National Apprenticeship Inspectorate.

Inadequate and delayed checks on new apprenticeship providers, lengthy delays in inspecting existing providers and no quality improvement processes or support for employers taking on apprentices have all combined to weaken the quality of apprenticeship provision in this country. In other words, the current setup is failing to ensure that all providers and employers are delivering high-quality training. Although giving Ofsted more resources may help address some of these concerns, a much wider drive for quality improvement is needed to overcome the existing flaws in the apprenticeship system.

To simplify the regulatory landscape and tackle poor-quality provision, this report recommends that a new body called the National Apprenticeship Inspectorate (NAI) is created. In effect, this body will be created by spinning out Ofsted's current apprenticeship inspection duties and then expanding its remit and responsibilities in several crucial areas. This will make sure that the existing expertise and insights already gathered from inspecting apprenticeship providers continues to inform future inspections and related activities. Rather than being restricted solely to inspecting and judging apprenticeship providers, the

responsibilities of the NAI will focus on improving the overall quality of apprenticeship delivery both on- and off-the-job:

- **Managing the Register of Apprenticeship Training Providers:** the NAI should take over the operation of the RoATP from the ESFA, meaning that the NAI will therefore be in charge of determining prospective providers' ability to deliver high-quality apprenticeships. As now, this will involve a range of tests in areas such as financial health and prior training experience, but the NAI will also conduct on-site visits to the prospective provider before a decision is made.
- **Inspections of training providers:** the role of inspecting apprenticeship providers will now be taken on by the NAI instead of Ofsted. All apprenticeship providers will be inspected by the NAI at least every three years irrespective of their previous inspection rating. Following every inspection, the NAI will give providers graded reports stating their overall performance as well as identifying areas of improvement. Through their inspection reports, the NAI will also provide guidance to weaker providers on how they can improve their delivery of apprenticeships.
- **Additional scrutiny of new training providers:** inspection visits from the NAI to new providers delivering apprenticeships will take place more frequently than at present (e.g. at 6 and 12 months after their first apprentices are recruited). In addition, the NAI will place caps on the number of apprentices that a new provider can recruit, with the cap being set after the NAI has visited the new provider to inspect their training facilities as part of the RoATP application process.
- **Quality improvement for training providers:** alongside their inspection reports, the NAI will publish 'best practice' for training providers on how to deliver high-quality training. These materials will be distributed online and through a network of training programmes offered to providers' staff. The use of such support packages will be voluntary for providers, although the NAI could make them mandatory for any provider that receives a poor inspection judgement.
- **Greater support for employers:** the NAI will conduct on-site visits to any employer who wishes to take on an apprentice for the first time to ensure that they have the necessary staffing and expertise in place. Echoing the systems used in other countries, voluntary qualifications for apprentice managers and mentors should also be designed and provided by the NAI. In addition, more support should be provided to employers to help them deliver a high-quality experience for apprentices. For example, the NAI could follow the example of Switzerland by introducing a checklist of 'quality criteria' for companies that they could use to self-assess the quality of their training and highlight areas for improvement.

To deliver this new remit, which extends beyond what Ofsted delivers at present, new investment will be needed. This report proposes that the NAI should have a budget of £60 million a year – three times what Ofsted is able to spend on all Further Education and Skills inspections. This should provide enough resources to conduct much more frequent inspections of all training providers, particularly new ones, as well as focusing more on quality improvement for providers and employers. Seeing as the DfE is currently handing back around £600 million a year to the Treasury in unspent funds from the apprenticeship levy,²⁶⁹ there is evidently plenty of funding available. More importantly, it is hard to imagine a more worthwhile investment than improving the quality of apprenticeships, including the removal of poor-quality providers as well as disinterested or disengaged employers.

RECOMMENDATION 7

To promote the supply of entry-level opportunities and clear progression routes into genuine high-quality apprenticeships, the ‘traineeships’ programme should be expanded. A bursary of £100 a week should also be introduced for trainees to support them with expenses such as food and transport.

The Richard Review originally intended for traineeships to replace the previous apprenticeship frameworks linked to lower skilled jobs because the Review was rightly concerned about ‘diluting’ the apprenticeship brand. This is not to say that low-skill roles are not valuable, but rather they do not align with the core features of an apprenticeship as they do not require substantial and skilled training programmes. With this report’s proposed introduction of training curricula, stronger regulations around off-the-job training and improved quality assurance, low-skill ‘apprenticeships’ should essentially cease to exist. Nevertheless, it is important to maintain routes into apprenticeships for learners who may not be ready to become an apprentice straightaway.

This report has shown that traineeships can deliver encouraging outcomes as well as high rates of satisfaction, and ‘occupational traineeships’ appear to have even more potential. As a result, this report proposes that occupational traineeships linked to high-quality apprenticeship standards or occupational routes should be expanded to give traineeships a greater focus on particular sectors and pathways. It would be logical to follow the existing collaborative development model used for the pilots of existing occupational traineeships, as this should make sure that any new occupational traineeship is a high-quality programme (albeit a shorter one than an apprenticeship).

What’s more, to make traineeships more accessible to learners and increase their perceived value as a career opportunity, a bursary of £100 per week for all trainees should be introduced.

This bursary will, in turn, make traineeships more attractive to learners and thus increase their popularity as a 'stepping stone' to securing a genuine high-quality apprenticeship or moving directly into employment elsewhere. Framing this £100-a-week as a bursary rather than a wage is prudent because traineeships are not a form of employment. The bursary model will also mean that participation in a traineeship will not affect a learner's entitlement to Universal Credit or other financial support from government. When combined with the expanded role for traineeships as an entry-level opportunity for young people, this new bursary should act as a catalyst for traineeships playing a much greater role in our education and training system in future.

Conclusion

“I believe that the definition of apprenticeships should be more focussed than it is today. This means redefining some of the activities that we currently include within the programme, and therefore removing them from the apprenticeship programme. I firmly believe that this need not mean that we will see a decline in apprenticeships volumes in the longer term, but this will be a risk in the short term as the system adjusts to these changes. In time, a stronger and clearer brand should boost the demand for those apprenticeships that generate the highest value for learners, employers and society. A high quality focussed programme will be self-reinforcing, attracting new employers and learners which, in turn, will strengthen the brand and attractiveness of the programme.”²⁷⁰

As can be seen above, the Richard Review recognised that the apprenticeship system in England needed to embark on a challenging journey if it wished to be considered a high-quality training route that rivalled some of the best technical education systems in the world. To complete this journey, clear expectations would need to be put on employers and training providers, apprenticeships would have to be widely understood by all stakeholders, and learners would need to be consistently offered challenging and broad experiences. The Richard Review was right to note that any current or future government “must not disregard the pockets of excellent practice which exist”²⁷¹ as they design and implement their reforms. Even so, ten years later, this report has shown just how far away England still is from realising the Review’s ambition of creating a truly self-reinforcing high-quality apprenticeship system.

In truth, the current system is beset by widespread and deep-rooted quality issues. Despite the Review stating that an apprenticeship is “at its heart...a form of education”,²⁷² too often employers and providers fail to deliver even the minimum level of training that apprentices are entitled to receive, and in some cases they leave apprentices to their own devices without any genuine training at all. What’s more, apprentices do not have access to detailed information about the content of their apprenticeship before signing up, making it difficult for them to know when they are not receiving the right quality and quantity of training. These problems are compounded by the Government not putting in place the quality assurance measures needed to guarantee that all employers and providers deliver an outstanding training programme. As a result, significant sums of money are being invested in courses that fail to meet the Government’s own definition of an apprenticeship, let alone meet the aspirations set out in the Richard Review. Such practices should never have been allowed to occur, much less continue.

Moving forward, a long overdue culture shift is needed among some employers regarding their commitment to providing valuable and relevant training to their apprentices. In addition, it is time to move away from the idea that ‘employers know best’ when it comes to what constitutes a high-quality apprenticeship, particularly when the employer-led agenda that dominated the last decade has clearly been to the detriment of other stakeholders. There is also an urgent need for more stringent regulations to make sure that apprenticeships are only offered and delivered by those providers with the desire, capacity and capability to offer apprentices a high-quality experience. As part of these regulations, the Government must set the bar higher for what constitutes ‘quality’ as well as consistently enforce the rules and procedures that are designed to protect apprentices from malpractice and exploitation.

Over 100,000 apprentices a year are dropping out of their programmes because of the unacceptable quality of their training and overall experience. Thus, the goal must be to ensure that we do not let another decade slip by in which so many apprentices are being badly let down. Given the scale of poor-quality apprenticeships that exist today, the changes proposed in this report would undoubtedly have a significant impact on the apprenticeship system. As the Richard Review acknowledged, driving up the quality of apprenticeships may result in a temporary dip in the quantity of apprenticeships in the short term. However, in the longer term, these changes will strengthen the apprenticeship brand and improve its attractiveness to learners of all ages. Without such improvements over the coming years, apprenticeships will continue to be “considered second class” and lack the ‘prestige’ tied to attending university²⁷³ - as the Richard Review warned ten years ago. The reforms in this report set out how policymakers can start a new journey towards building a self-reinforcing high-quality apprenticeship system that is as respected and admired as a university degree. Warm words from government ministers and civil servants about apprenticeship quality will no longer suffice – action is now required, and soon.

References

- ¹ Doug Richard, *The Richard Review of Apprenticeships* (Department for Business, Innovation and Skills, 2012), 2.
- ² *Ibid.*, 20.
- ³ *Ibid.*, 3.
- ⁴ *Ibid.*
- ⁵ *Ibid.*
- ⁶ *Ibid.*, 15–16.
- ⁷ *Ibid.*, 7.
- ⁸ *Ibid.*, 8.
- ⁹ *Ibid.*
- ¹⁰ *Ibid.*, 19.
- ¹¹ *Ibid.*, 12.
- ¹² Department for Education, 'Academic Year 2021/22: Apprenticeships and Traineeships', Webpage, 2022.
- ¹³ Institute for Apprenticeships and Technical Education, 'What We Do', Webpage, 2022.
- ¹⁴ Department for Business, Innovation and Skills and Nick Boles, 'Government Kick-Starts Plans to Reach 3 Million Apprenticeships', Press Release, 14 June 2015.
- ¹⁵ IFF Research, *Apprenticeships Evaluation 2021 - Learners* (Department for Education, 2022), 111.
- ¹⁶ *Ibid.*, 116.
- ¹⁷ Department for Education, 'Academic Year 2021/22: Apprenticeships and Traineeships', 2022.
- ¹⁸ Billy Camden, 'Shock as Half of Apprentices Drop Out', *FE Week*, 1 April 2022.
- ¹⁹ Higher Education Statistics Agency, 'UK Performance Indicators: Non-Continuation 2020/21', Webpage, 2022.
- ²⁰ IFF Research, *Apprenticeships Evaluation 2021 - Learners*, 164.
- ²¹ *Ibid.*, 164.
- ²² GOV.UK, 'National Minimum Wage and National Living Wage Rates', Webpage, 2022.
- ²³ Richard, *The Richard Review of Apprenticeships*, 4.
- ²⁴ *Ibid.*, 37.
- ²⁵ *Ibid.*, 38.
- ²⁶ International Labour Office, *Overview of Apprenticeship Systems and Issues: ILO Contribution to the G20 Task Force on Employment* (Geneva: ILO, 2012), 3.
- ²⁷ *Ibid.*, 2–3.
- ²⁸ Department for Business, Innovation and Skills, *The Future of Apprenticeships in England: Implementation Plan* (London: Her Majesty's Stationery Office, 2013), 9.
- ²⁹ Institute for Apprenticeships and Technical Education, 'Developing an Occupation Proposal', Webpage, 2022.
- ³⁰ *Ibid.*
- ³¹ Richard, *The Richard Review of Apprenticeships*, 47.
- ³² *Ibid.*
- ³³ *Ibid.*, 6–7.
- ³⁴ *Ibid.*, 7.
- ³⁵ *Ibid.*
- ³⁶ *Ibid.*, 45.
- ³⁷ Institute for Apprenticeships and Technical Education, 'Trailblazer Groups', Webpage, 2022.

-
- ³⁸ Tom Richmond and Jonathan Simons, *The Skills We Need, And Why We Don't Have Them: How Apprenticeships Should Be Reformed to Make the UK Compete on the Global Stage* (London: Policy Exchange, 2016), 38.
- ³⁹ Ibid.
- ⁴⁰ Richard, *The Richard Review of Apprenticeships*, 42.
- ⁴¹ Richmond and Simons, *The Skills We Need, And Why We Don't Have Them: How Apprenticeships Should Be Reformed to Make the UK Compete on the Global Stage*, 39.
- ⁴² David Sainsbury, *Report of the Independent Panel on Technical Education* (London: Department for Education and Department for Business, Innovation and Skills, 2016), 40.
- ⁴³ Ibid., 41.
- ⁴⁴ Institute for Apprenticeships and Technical Education, 'Search the Apprenticeships', Webpage, 2022.
- ⁴⁵ HM Treasury, *Spending Review and Autumn Statement 2015* (London: HM Treasury, 2015).
- ⁴⁶ Tom Richmond, *A Qualified Success: An Investigation into T-Levels and the Wider Vocational System* (London: Policy Exchange, 2018), 60.
- ⁴⁷ UK Commission for Employment and Skills, 'UKCES Is Now Closed', GOV.UK, 16 March 2017.
- ⁴⁸ Institute for Apprenticeships, 'About the Institute for Apprenticeships and Technical Education', Webpage, 2022.
- ⁴⁹ Paul Offord, 'New IfA Boss Reveals How He Got the Job', *FE Week*, 19 January 2018.
- ⁵⁰ Billy Camden, 'Coupland Tells FE Week She Will Have "independent Voice" and Is "Excited to Step out of the Confines" of the DfE', *FE Week*, 23 January 2020.
- ⁵¹ Institute for Apprenticeships and Technical Education, 'Route Panels', Webpage, 2022.
- ⁵² Ibid.
- ⁵³ Institute for Apprenticeships and Technical Education, 'Apprentice Panel', Webpage, 2022.
- ⁵⁴ House of Commons Education Committee, *The Apprenticeships Ladder of Opportunity: Quality Not Quantity - Sixth Report of Session 2017-19*, HC 334 (London: Her Majesty's Stationery Office, 2018), 16.
- ⁵⁵ House of Lords Economic Affairs Committee, *Treating Students Fairly: The Economics of Post-School Education - 2nd Report of Session 2017-19*, HL Paper 139 (London: Her Majesty's Stationery Office, 2018), 73.
- ⁵⁶ Ibid., 77.
- ⁵⁷ National Audit Office, *Delivering Value through the Apprenticeships Programme* (London: NAO, 2016), 40.
- ⁵⁸ National Audit Office, *The Apprenticeships Programme* (London: NAO, 2019), 30.
- ⁵⁹ Ibid.
- ⁶⁰ Ofsted, *The Annual Report of Her Majesty's Chief Inspector of Education, Children's Services and Skills 2017/18*, HC 1707 (London: Her Majesty's Stationery Office, 2018), 15.
- ⁶¹ This apprenticeship standard is in the process of being revised, but the version being referenced currently remains approved for delivery.
- ⁶² Institute for Apprenticeships and Technical Education, 'Accountancy or Taxation Professional', Webpage, 2022.
- ⁶³ Institute for Apprenticeships and Technical Education, 'Developing an Occupation Proposal'.
- ⁶⁴ Department for Education, 'Academic Year 2021/22: Apprenticeships and Traineeships', Webpage, 2022.
- ⁶⁵ Institute for Apprenticeships and Technical Education, 'Senior Leader', Webpage, 2022.
- ⁶⁶ Ibid.
- ⁶⁷ Department for Education, 'Academic Year 2021/22: Apprenticeships and Traineeships', 2022.
- ⁶⁸ Richard, *The Richard Review of Apprenticeships*, 34.
- ⁶⁹ Ibid.
- ⁷⁰ Ibid., 29.
- ⁷¹ Ibid., 33-34.
- ⁷² Ibid., 34.

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- ⁷³ Institute for Apprenticeships and Technical Education, 'Hospitality Team Member', Webpage, 2019.
- ⁷⁴ Bundesagentur für Arbeit, *Framework Curriculum for Vocational Training in the Hospitality Services Industry* (Berlin: Conference of Ministers of Education and Cultural Affairs, 2014).
- ⁷⁵ All the adverts presented in this chapter were found live on the Government's Apprenticeship Vacancy Service website from August to October 2022.
- ⁷⁶ Institute for Apprenticeships and Technical Education, 'Developing an Occupation Proposal'.
- ⁷⁷ Ibid.
- ⁷⁸ Richard, *The Richard Review of Apprenticeships*, 34.
- ⁷⁹ This finding was repeatedly identified by former Starbucks staff and other baristas on the first page of search results for the term 'How long to train at starbucks'.
- ⁸⁰ Department for Education, 'Academic Year 2021/22: Apprenticeships and Traineeships', 2022.
- ⁸¹ Institute for Apprenticeships and Technical Education, 'Customer Service Practitioner', Webpage, 2018.
- ⁸² These roles were all identified by searching for a "Customer Service Practitioner" on the Government's Apprenticeship Vacancy Service website.
- ⁸³ Department for Education, 'Academic Year 2021/22: Apprenticeships and Traineeships', 2022.
- ⁸⁴ Tom Richmond, *Runaway Training: Why the Apprenticeship Levy Is Broken and How to Fix It* (London: EDSK, 2020), 21.
- ⁸⁵ Institute for Apprenticeships and Technical Education, 'Recruitment Resourcer', Webpage, 2017.
- ⁸⁶ Institute for Apprenticeships and Technical Education, 'Housing and Property Management Assistant', Webpage, 2022.
- ⁸⁷ Institute for Apprenticeships and Technical Education, 'Investment Operations Administrator', Webpage, 2015.
- ⁸⁸ Institute for Apprenticeships and Technical Education, 'Junior Estate Agent', Webpage, 2018.
- ⁸⁹ Alison Wolf, *An Adult Approach to Further Education* (London: The Institute of Economic Affairs, 2009), 103.
- ⁹⁰ This apprenticeship standard is in the process of being revised, but the version being referenced currently remains approved for delivery
- ⁹¹ Institute for Apprenticeships and Technical Education, 'Retailer', Webpage, 2019.
- ⁹² Ibid.
- ⁹³ Department for Education, 'Academic Year 2021/22: Apprenticeships and Traineeships', 2022.
- ⁹⁴ Aldi, 'Being an Aldi Store Assistant', Webpage, 2022.
- ⁹⁵ Virgin Atlantic, 'Cabin Crew', Webpage, 2022.
- ⁹⁶ easyJet, 'Cabin Crew Training', Webpage, 2022.
- ⁹⁷ British Airways, 'Cabin Crew FAQs', Webpage, 2022.
- ⁹⁸ So far for the 2021/22 year there have been zero starts on the 'Cabin Crew' apprenticeship standard, although it has not been withdrawn by the IfATE.
- ⁹⁹ Institute for Apprenticeships and Technical Education, 'Urban Driver', Webpage, 2022.
- ¹⁰⁰ Ibid.
- ¹⁰¹ Ibid.
- ¹⁰² Train Drive, 'What Is Involved with C1 Licence Driver Training London', Webpage, 2022.
- ¹⁰³ GOV.UK, 'Driver CPC Training for Qualified Drivers', Webpage, 2022.
- ¹⁰⁴ Institute for Apprenticeships and Technical Education, 'Dog Groomer', Webpage, 2021.
- ¹⁰⁵ Just4paws, 'All Inclusive Professional City & Guilds Dog Grooming Course', Webpage, 2022.
- ¹⁰⁶ Ibid.
- ¹⁰⁷ Richard, *The Richard Review of Apprenticeships*, 36.
- ¹⁰⁸ Ibid.
- ¹⁰⁹ Ibid.

-
- ¹¹⁰ Tom Richmond and Eleanor Regan, *Finding a NEET Solution: How to Prevent Young People from Falling out of Our Education System* (London: EDSK, 2022), 38.
- ¹¹¹ *Ibid.*, 39.
- ¹¹² Richard Dorsett et al., *Estimating the Impact of Traineeships: Final Report* (London: Department for Education, 2019), 10–12.
- ¹¹³ Alice Fitzpatrick et al., *Traineeships: Year Two Process Evaluation Research Report* (London: Department for Education, 2017).
- ¹¹⁴ Education and Skills Funding Agency, 'Traineeships: Framework for Delivery 2021 to 2022', Webpage, 13 August 2021.
- ¹¹⁵ Learning and Work Institute, 'Review of Occupational Traineeship Pilots', Webpage, 2021.
- ¹¹⁶ *Ibid.*
- ¹¹⁷ Youth Employment UK, *Youth Voice: Census Report 2021* (Nottingham: Youth Employment UK, 2021), 38.
- ¹¹⁸ Department for Education, 'Academic Year 2021/22: Apprenticeships and Traineeships', 2022, 22.
- ¹¹⁹ European Foundation for the Improvement of Living and Working Conditions, *NEETs Young People Not in Employment, Education or Training: Characteristics, Costs and Policy Responses in Europe* (Luxembourg: Publications Office of the European Union, 2012), 46.
- ¹²⁰ Department for Education, 'Academic Year 2021/22: Apprenticeships and Traineeships', 2022.
- ¹²¹ Billy Camden, 'What a Waste: Sector Exasperated as £65m for Traineeships Is Handed Back to Treasury', *FE Week*, 28 January 2022.
- ¹²² *Ibid.*
- ¹²³ Jane Hickie, 'The Government Must Pay Young People to Enter Traineeships', *FE Week*, 8 January 2022.
- ¹²⁴ *Ibid.*
- ¹²⁵ Ian Ross, 'The PM-Hopefuls Needs a Plan for Missed Traineeship Targets', *FE Week*, 27 July 2022.
- ¹²⁶ Richard, *The Richard Review of Apprenticeships*, 30.
- ¹²⁷ *Ibid.*
- ¹²⁸ *Ibid.*, 32.
- ¹²⁹ *Ibid.*, 5.
- ¹³⁰ *Ibid.*, 38.
- ¹³¹ *Ibid.*, 37.
- ¹³² *Ibid.*, 33.
- ¹³³ *Ibid.*
- ¹³⁴ *Ibid.*, 17.
- ¹³⁵ Institute for Apprenticeships and Technical Education, 'Team Leader or Supervisor', Webpage, 2022.
- ¹³⁶ *Ibid.*
- ¹³⁷ CMI, 'Principles of Management and Leadership (Level 3)', Webpage, 2022.
- ¹³⁸ St Helens College, 'Level 3 CMI Diploma in Principles of Management and Leadership', Webpage, 2022.
- ¹³⁹ CMI, 'Strategic Management & Leadership Practice (Level 7)', Webpage, 2022.
- ¹⁴⁰ Institute for Apprenticeships and Technical Education, 'Senior Leader'.
- ¹⁴¹ St Helens College, 'Level 5 CMI Diploma in Management and Leadership', Webpage, 2022.
- ¹⁴² CMI, 'Management and Leadership (Level 5)', Webpage, 2022.
- ¹⁴³ St Helens College, 'Level 5 CMI Diploma in Management and Leadership'.
- ¹⁴⁴ Department for Education, 'Academic Year 2021/22: Apprenticeships and Traineeships', 2022.
- ¹⁴⁵ CIPD, *Addressing Employer Underinvestment in Training: The Case for a Broader Training Levy* (London: CIPD, 2019).
- ¹⁴⁶ Richard, *The Richard Review of Apprenticeships*, 53–54.

-
- ¹⁴⁷ Institute for Apprenticeships and Technical Education, 'Customer Service Specialist', Webpage, 2022.
- ¹⁴⁸ Ibid.
- ¹⁴⁹ Institute for Apprenticeships and Technical Education, 'Housing and Property Management', Webpage, 2022.
- ¹⁵⁰ Ibid.
- ¹⁵¹ Institute for Apprenticeships and Technical Education, 'Recruitment Consultant', Webpage, 2022.
- ¹⁵² Richard, *The Richard Review of Apprenticeships*, 89.
- ¹⁵³ Ibid., 86.
- ¹⁵⁴ Ibid.
- ¹⁵⁵ Ibid., 87.
- ¹⁵⁶ Ibid., 18.
- ¹⁵⁷ Ibid., 90.
- ¹⁵⁸ Ibid.
- ¹⁵⁹ Ibid.
- ¹⁶⁰ Ibid., 90–91.
- ¹⁶¹ Department for Business, Innovation and Skills, *The Future of Apprenticeships in England: Implementation Plan*, 19. Ibid.
- ¹⁶² Mark Dawe, 'Reverse the 20% Off-the-Job Apprentice Training Rule', *FE Week*, 17 July 2017. Ibid.
- ¹⁶³ Expert Contributor, 'Homework Should Count in 20% Off-the-Job Training Rule', *FE Week*, 17 July 2017. Ibid.
- ¹⁶⁴ Expert Contributor, 'The 20% Off-the-Job Rule Will Make Apprenticeships Economically Unviable', *FE Week*, 25 March 2017. Ibid.
- ¹⁶⁵ IFF Research, *Apprenticeships Evaluation 2021 - Learners*, 92.
- ¹⁶⁶ Billy Camden, 'ESFA Ditches 20% Off-the-Job Requirement as Part of 2022/23 Apprenticeship Funding Rule Changes', *FE Week*, 27 May 2022. Ibid.
- ¹⁶⁷ Department for Education, *Apprenticeship Funding Rules and Guidance for Employers: August 2022 to July 2023* (Department for Education, 2022), 20.
- ¹⁶⁸ Ibid.
- ¹⁶⁹ All the statements presented here are taken from adverts that were found live on the Government's Apprenticeship Vacancy Service website from September to October 2022.
- ¹⁷⁰ IFF Research, *Apprenticeships Evaluation 2021 - Learners*, 92.
- ¹⁷¹ Ibid., 93.
- ¹⁷² Ibid.
- ¹⁷³ Ibid., 94.
- ¹⁷⁴ Ibid., 96.
- ¹⁷⁵ Ibid., 84.
- ¹⁷⁶ Ibid., 96.
- ¹⁷⁷ Ibid., 97.
- ¹⁷⁸ Michaela Brockmann et al., *On- and off-the-Job Training in Apprenticeships in England* (London: The Gatsby Charitable Foundation, 2020), 37.
- ¹⁷⁹ Ibid., 23.
- ¹⁸⁰ Ibid., 28.
- ¹⁸¹ Ibid.
- ¹⁸² Ibid.
- ¹⁸³ Ibid.
- ¹⁸⁴ Richard, *The Richard Review of Apprenticeships*, 90. Ibid.

-
- ¹⁸⁵ IFF Research, *Apprenticeships Evaluation 2021 - Learners*, 97.
- ¹⁸⁶ Richard, *The Richard Review of Apprenticeships*, 18.
- ¹⁸⁷ *Ibid.*, 11.
- ¹⁸⁸ *Ibid.*, 18.
- ¹⁸⁹ *Ibid.*, 11.
- ¹⁹⁰ *Ibid.*, 93.
- ¹⁹¹ *Ibid.*
- ¹⁹² Skills Funding Agency, *Supporting Quality and Employer Choice through a New Register of Apprenticeship Training Providers* (Skills Funding Agency, 2016), 3.
- ¹⁹³ *Ibid.*, 5.
- ¹⁹⁴ Education and Skills Funding Agency, 'Ofsted Inspection and ESFA Intervention', Webpage, 2021.
- ¹⁹⁵ Ofsted, *The Annual Report of Her Majesty's Chief Inspector of Education, Children's Services and Skills 2020/21*, HC 867 (London: Her Majesty's Stationery Office, 2021), 46.
- ¹⁹⁶ *Ibid.*
- ¹⁹⁷ *Ibid.*, 47.
- ¹⁹⁸ *Ibid.*
- ¹⁹⁹ Jason Noble, 'Contracts Risk for Provider after Ofsted Finds "students" Who Never Studied with the Firm', *FE Week*, 2 September 2022. *Ibid.*
- ²⁰⁰ Billy Camden, 'Three Apprenticeship Providers Slammed for Off-the-Job Shortcomings', *FE Week*, 9 July 2022.
- ²⁰¹ *Ibid.* *Ibid.*
- ²⁰² Billy Camden, 'Rail Provider Considers Ofsted Challenge after Damning "inadequate" Report', *FE Week*, 29 January 2022. *Ibid.*
- ²⁰³ Fraser Whieldon, 'Ofsted Slams Major NHS Trust for Rapid Apprenticeship Recruitment', *FE Week*, 22 October 2021.
- ²⁰⁴ Tallulah Taylor, 'Grade 4 Leadership and Management Apprenticeship Firm Considers Ofsted Legal Challenge', *FE Week*, 3 October 2022. *Ibid.*
- ²⁰⁵ Education and Skills Funding Agency, 'Ofsted Inspection and ESFA Intervention'.
- ²⁰⁶ Education and Skills Funding Agency, 'Guidance - Prepare to Offer Apprenticeships', Webpage, 2021.
- ²⁰⁷ House of Commons Education Committee, *The Apprenticeships Ladder of Opportunity: Quality Not Quantity - Sixth Report of Session 2017-19*, 11.
- ²⁰⁸ *Ibid.*
- ²⁰⁹ *Ibid.*, 12.
- ²¹⁰ *Ibid.*
- ²¹¹ Education and Skills Funding Agency, 'Ofsted Inspection and ESFA Intervention'.
- ²¹² Ofsted, 'Inspecting Further Education and Skills: Guide for Providers', Webpage, 2022.
- ²¹³ Ofsted, 'Office for Standards in Education, Children's Services and Skills: Annual Report and Accounts 2021-22', Webpage, 2022.
- ²¹⁴ Billy Camden, 'Revealed: ESFA Investigation into Fastest Growing Apprenticeship Provider', *FE Week*, 4 February 2021.
- ²¹⁵ *Ibid.*
- ²¹⁶ Billy Camden, 'All Apprenticeship Providers Told to Reapply to RoATP yet Again', *FE Week*, 10 February 2021.
- ²¹⁷ Richard, *The Richard Review of Apprenticeships*, 86.
- ²¹⁸ *Ibid.*, 91.
- ²¹⁹ *Ibid.*

-
- ²²⁰ Ibid.
- ²²¹ Ibid.
- ²²² Ibid., 13.
- ²²³ Ibid., 88.
- ²²⁴ Learning and Work Institute, *Apprenticeship Outcomes and Destinations* (Learning and Work Institute, 2022), 29.
- ²²⁵ Ibid.
- ²²⁶ Education and Skills Funding Agency, 'Apprenticeship Agreement: Template', Webpage, 2022.
- ²²⁷ Department for Education, *Apprenticeship Funding Rules and Guidance for Employers: August 2022 to July 2023*, 28–29.
- ²²⁸ BIBB, *Apprenticeship-Type Schemes and Structured Work-Based Learning Programmes* (Bonn: BIBB - Federal Institute for Vocational Education and Training, 2014), 2.
- ²²⁹ Education and Skills Funding Agency, 'Guidance - Apprenticeships: Off-the-Job Training', Webpage, 2022.
- ²³⁰ Richard, *The Richard Review of Apprenticeships*, 111.
- ²³¹ IFF Research, *Apprenticeships Evaluation 2021 - Learners*, 85.
- ²³² Ibid., 86.
- ²³³ Ibid., 44.
- ²³⁴ Ibid., 46.
- ²³⁵ Ibid., 47.
- ²³⁶ Learning and Work Institute, *Apprenticeship Outcomes and Destinations*, 29.
- ²³⁷ Ibid.
- ²³⁸ Institute for Apprenticeships and Technical Education, 'Developing a Specimen Training Plan', Webpage, 2022.
- ²³⁹ Brockmann et al., *On- and off-the-Job Training in Apprenticeships in England*, 13.
- ²⁴⁰ Ibid., 14.
- ²⁴¹ Ibid., 15.
- ²⁴² Ibid.
- ²⁴³ Ibid., 16.
- ²⁴⁴ Ibid.
- ²⁴⁵ Ibid.
- ²⁴⁶ Ibid., 17.
- ²⁴⁷ Ibid.
- ²⁴⁸ Ibid., 18.
- ²⁴⁹ Ibid., 19.
- ²⁵⁰ Ibid.
- ²⁵¹ Ibid.
- ²⁵² Ibid., 37.
- ²⁵³ Ibid., 38.
- ²⁵⁴ IFF Research, *Apprenticeships Evaluation 2021 - Learners*, 117.
- ²⁵⁵ Ibid., 122.
- ²⁵⁶ Ibid., 118.
- ²⁵⁷ Ibid., 122.
- ²⁵⁸ Learning and Work Institute, *Apprenticeship Outcomes and Destinations*, 38.
- ²⁵⁹ Ibid.
- ²⁶⁰ Brockmann et al., *On- and off-the-Job Training in Apprenticeships in England*, 11.

²⁶¹ Małgorzata Kuczera and Simon Field, *Apprenticeship in England, United Kingdom*, OECD Review of Vocational Education and Training (Paris: OECD Publishing, 2018), 15.

²⁶² *Ibid.*, 48–51.

²⁶³ *Ibid.*, 52–53.

²⁶⁴ *Ibid.*, 52.

²⁶⁵ *Ibid.*, 49.

²⁶⁶ *Ibid.*

²⁶⁷ *Ibid.*, 50.

²⁶⁸ *Ibid.*, 54.

²⁶⁹ Billy Camden, 'DfE Forced to Finally Reveal True Amount of Apprenticeship Funding Returned to Treasury', *FE Week*, 13 October 2022.

²⁷⁰ Richard, *The Richard Review of Apprenticeships*, 38.

²⁷¹ *Ibid.*, 14.

²⁷² *Ibid.*, 3.

²⁷³ *Ibid.*, 15.