Cover Sheet

Response to Consultation on Review of Apprenticeship Training in Ireland

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Occupational sectors which are covered in the submission:

The existing apprenticeship system provides a process for the submission and development of apprenticeship in any sectors where the necessary levels of industry support and commitment exists to sustain the apprenticeship over the medium to longer term. Accordingly this submission, although with a significant focus on existing apprenticeship sectors, envisages and supports expansion in time into other sectors, as appropriate.

Date of submission: 23rd August 2013
FÁS Training Authority

FÁS

Submission to

Department of Education and Skills

on the

Review of Apprenticeship Training in Ireland

August 2013
Consultation on Review of Apprenticeship in Ireland. Suggested issues for submissions

Area 1  Overview

1. Having regard to the issues outlined in the Press Release and Discussion Paper, please set out your views of the effectiveness of the current apprenticeship programme, highlighting the issues you consider should be addressed to ensure a skilled workforce to meet Ireland's current and future needs.

The logic of the Irish Standards based Apprenticeship system (SBA) developed around meeting intermediate skill needs of the economy in the designated craft areas. In that regard, SBA has been a success and remains a cornerstone of intermediate skills development, given its capacity to produce high quality craft workers

A further illustration of the success of the Irish Apprenticeship System in training craftworkers is the demand from Australia, New Zealand, and Canada, with delegations from these countries visiting Ireland to discuss, with the relevant stakeholders (including FÁS), the quality and availability of Irish craftworkers.

The success of the Irish SBA can also be demonstrated by the success of Irish apprentices at successive World Skills Competitions. The World Skills competition held in London in October 2011 provided an opportunity for young apprentices to compete against 48 countries and 827 competitors. The Irish team of 11 competitors obtained 3 Gold medals and 5 Medallions for Excellence and its average point score secured 6th place in the world, and more recently in Leipzig, Germany, Ireland achieved 2 Gold medals, one Bronze medal and 7 Medallions for Excellence with an overall 11th place (from 47 competing countries and 883 competitors).

Currently, the demand for apprenticeship is at a level below the norm prior to the 'boom'. Notwithstanding this, Forfás has identified just two adjustments that are required to the SBA. The first relates to examining the duration of each apprenticeship with a view to reducing the current mandatory period of 4 years. The second relates to installing effective mechanisms to ensure that supply and demand remain aligned.

It is important therefore to de-couple the issue of the effectiveness of the skills training delivered by the SBA model from the perceived weakness of current institutional arrangements to deal effectively with the consequences of the severe fluctuations, such as the exceptional demand by employers primarily for construction-related trades during the so-called ‘tiger’ years. According to Forfás, the solution is to allow SBA to continue to be demand-led but introduce a moderating mechanism to avoid under and over supply issues.

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1 Forfás Review of Labour Market Programmes 2010. See also Enterprise Strategy Group Report – Ahead of the Curve, July 2004. See also Journal of Vocational Education and Training; Meeting the skills needs of a buoyant economy: apprenticeship - the Irish experience O'Connor (Cork Institute of Technology), March 2006.

2 Forfás Review of Labour Market Programmes 2010.
It is important to note the moderating measures taken as the construction sector collapsed and recession took hold. These included managing the consequences of the fall-off in employer demand for apprentices and the resultant overcapacity in the apprenticeship training system and developing and implementing a series of strategies to address the progression and certification needs of the large number of redundant apprentices who were unable to progress their careers due to redundancy or collapse of the employer’s business.

At the core of this issue is not the effectiveness of the SBA to produce skilled workers at intermediate level. Rather, how to strike the right balance between

1. the supply of intermediate skills required by the economy.
2. the ‘on the ground’ demand for these skills at individual enterprise level, expressed in terms of the willingness of all apprenticeship stakeholders to take the necessary steps with new apprentice registrations.
3. required to (re)adjust the moderating mechanism in a timely manner to avoid a recurrence of the present situation. The essence of the argument for such a mechanism is that a well-supported mechanism will tend to anticipate and then stabilise supply and demand for apprentices and/or bring equilibrium back into the system in a shorter timeframe than heretofore.
4. It is the nature of market-led systems to seek out their ‘natural’ equilibrium over time. The purpose of the moderating mechanism should be to minimise /eliminate if possible, this ‘time lag’. This year for example, around 80% of the 1,600 new apprentice registrations anticipated in 2013 will now be in sectors other than construction.

Challenges facing SBA
There are a number of challenges regarding the current FÁS apprenticeship model where improvements/adjustments ought to be considered including the need to:

- Underpin the quality of the on-the-job element of SBA to ensure a consistently high level of skill, knowledge and competence; and afford apprentices the opportunity to apply the expertise they have acquired during on-the-job phases to a variety of appropriate tasks
- Develop formal and more widespread progression routes, and map the apprenticeship model of the SBA onto higher courses in the National Framework of Qualifications
- Address the absence of intermediate level occupations in industry sectors not traditionally associated with SBA apprenticeship, such as IT
- Address different entry-level requirements for some trades to ensure the apprentice can cope with the levels of learning and the rigour of the assessments relating to the programme
- Meet the challenge to all apprenticeship stakeholders to construct a dynamic capability identifying areas of change in a developing economy, enabling the system to respond quickly and efficiently to meet its needs and introduce new curricula reflecting this change
Meet the challenge of developing a system that allows the State to adjust provision quickly to requirements

Address the question of whether the State should, in addressing youth unemployment in particular, adopt and fund an ‘over-supply’ strategy i.e. provide more apprenticeship places than market (employers) demand. An over-supply already exists in some trades

How to make adjustments to the SBA system without undermining it

SBA and an ‘Oversupply’ Policy

It is important to acknowledge the real and substantial contribution of Irish employers to SBA in particular in the form of wages for the apprentice in respect of around 80% of the duration (3 years) of the apprenticeship programme relating to training in the workplace. In addition, employers are levied for the National Training Fund and it is monies from this source that funds most of the costs of apprenticeship training under-taken in FÁS, whereas the taxpayer (government) funds most of the costs of the apprenticeship training undertaken in the education system, i.e. in the Institutes of Technology.

The current Irish funding model sits more closely with the first of two basic financing schemes that tends to apply more generally within the EU. In the mainly company-based schemes, the funding comes from the diverse stakeholders, with a prominent share by the companies (70+% in Germany), together with contributions from the government. In the mainly school-based apprenticeship schemes, public funding (National, European) can amount to 85%-95% of the total costs, which is complemented by private contributions (companies, individual apprentices). Employers, especially in Irish small to medium-sized companies, and most particularly in the current fiscal crisis, are not generally in a position to absorb additional costs associated with apprenticeships, even if some of these costs were to be off-set by grants of one sort or another.

Labour and skill requirements of business remain highly dependent on the activity involved. In knowledge-intensive manufacturing and services, value creation requires a high levels of technical skill, judgement, insight and ‘know-how’ from individuals drawing on their specialist knowledge in the workplace. In this workplace context the development of both technical and soft skills such as analytical skills, problem solving and innovation are

Employers in some countries are incentivised to train more apprentices than they require themselves e.g. UK and in Australia, primarily as a mechanism to address rising youth unemployment and/or to include ethnic minorities. Another strategy is employed in some parts of France whereby failure to train apprentices may result in a fine being imposed on the company.

Currently, funding for apprenticeship training is sourced from the employer-levied, National Training Fund (NTF), together with central government funds. The fund is fed from a levy on employers of 0.7% of employee earnings.
equally important. Value creation will be maximised as individual workers manage more complexity, not simplicity, whether in the operation of machinery or in the provision of a business service.

This is a key strength of a ‘dual system’ model of apprenticeship and the current SBA programme including the on-going curriculum development of each apprenticeship programme which strives to ensure both types of skills are imparted and then applied in the workplace.

As the learning demands on apprentices are therefore likely to increase, it may be opportune to re-examine entry requirements on a trade by trade basis to ensure that apprentices have the capacity to undertake rigorous programmes of theoretical and practical learning. The time requirements for each trade may also be impacted upon.

In broad terms, the proposed adjustments below acknowledge that the duration of SBA programmes of 3-4 years and the proportion of time allocated to off-the-job training at approximately 25% are generally in line with many systems of apprenticeship type training. British practice tends to differ from German and Swiss apprenticeship systems, reflecting the so-called ‘competence revolution’ in vocational qualifications, downgrading technical knowledge relative to practical, job-related skills.

A key consideration therefore is how to structure and sequence the ‘on’ and ‘off the job’ periods and to determine the optimum duration for each ‘on’ and ‘off the job’ period to maximise learning opportunities for each apprentice, while reducing costs to the taxpayer and the employer. The first of these aims is more likely to succeed where it is feasible from a provider and employer point of view to sequence the ‘on’ and ‘off-the-job’ learning periods as closely as possible, taking account of cost effectiveness for provider and employer. Close proximity tends to optimise the apprentice’s chances of achieving the learning outcomes (and certification) first time around by facilitating learning transfer from theory to practice and providing time for reflection and subsequent adjustment where required.

With regard to cost effectiveness, the current block release system for SBA programmes has enjoyed support from apprenticeship stakeholders in Ireland and creates significant efficiencies for providers in terms of planning and resource and facilities’ utilisation.

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5 Various Forfás sectoral reports e.g. ICT, Green Energy, Bio-Pharm, report that identify future skill needs such as ‘Guidance for Higher Education providers on current and future skills needs of enterprise’, reports on the needs of small business such as ‘Report of the advisory group on small business’, reports on innovation such as ‘Strategy for Science, Technology and Innovation’.


7 The UK work-based system encompasses a wide range of occupations, with varying skill levels and is a notable exception and generally provide only 1-2 days per month which is far less than the recognised dual system generally. Some UK engineering apprentices however, still spend approximately nine months ‘off the job’ at the beginning of their programme.

8 ESRC Centre; Skills Knowledge and Organisational Performance, Trainee Pay in Britain, Germany and Switzerland: Markets and Institutions; SKOPE Research Paper No. 96, July 2010; King’s College Cambridge, Hochschule für Technik und Wirtschaft Berlin and the University of Zurich, Switzerland.
Proposed Adjustments to the Apprenticeship Programme

The FÁS submission is focused on the existing apprenticeship system and the evolution of that system as a key contributor to intermediate skills development (trade) as Ireland strives to restore its economic well-being. Legislation is being advanced for the establishment of SOLAS and the dissolution of FÁS. The Further Education and Training Act 2013 provides for the establishment of SOLAS. It is envisaged that SOLAS will be formally established before the end of this year and will provide a broad five-year national strategy for the further education and training sector. That strategy will be informed by the outcomes of the Apprenticeship Review process.

Given the above reform context, FÁS is proposing significant tailored adjustments to the apprenticeship programme in the following core areas:

- Move from a “standards + time served” to a “standards based” apprenticeship model
- Move from three off-the-job phases of training to two off-the-job phases of training by the amalgamation of the current Phases 4 and 6 into one off-the-job phase
- The delivery of the proposed model for off-the-job training to be undertaken in the Further Education and Training Sector and/or with appropriate contributions and support from the Higher Education Sector
- Each apprenticeship trade to be submitted for placement on the National Framework of Qualifications as trade curriculum reviews are completed
- The revised apprenticeship phasing to be based on three stages of sequential training and these will include a Development Phase, Progression Phase and Completion Phase including a final test of competence.

### Recruitment of Apprentices including matching employer demand with training provider capacity

- A register to be established of approved employers for the recruitment and training of apprentices with the objective of promoting compliance with, and commitment to, the apprenticeship programme
- Only employers listed on the register will be eligible to advertise and recruit on an annual basis for a pre-approved number of apprentices, based on the apprentice/craftsperson ratio for the employment concerned
- Annual forecast/estimation of industry requirements for registrations by trade to be undertaken by SOLAS in consultation with the relevant industry representative bodies and training providers to assist in planning capacity requirements within the annual budget framework
- The introduction of a moderating mechanism for the matching of employer demand with training provider capacity

### Apprenticeship Entry Requirements

- Trade specific educational entry pre-requirements that are appropriate and proportional to ensure successful progression through the SBA programme
including all relevant assessments, with minimum unnecessary referrals and drop outs

- Entry requirements to be reviewed for mature entrants and for those who have not completed an official apprenticeship and the relevant examinations for craftworker status

### Duration of Apprenticeship

- Review the duration of phases on a trade specific basis and move to a fully “standards based” apprenticeship, to include minimum phase durations, off-the-job phase durations to be based on the individual trade requirements, and the introduction of a final test of competence to meet award requirements

### Range of Apprenticeship Occupations

- Continue to review the range of apprenticeship occupations and introduce, where appropriate, with the support of industry and individual employers, new apprenticeship training programmes that have a wider scope outside of the traditional areas to meet the changing business demographic and to increase the attractiveness of and access to apprenticeships from a more diverse cohort of individuals including females

3. **How should the Irish apprenticeship system fit into the EU and international structures?**

Within the Irish education framework, FÁS apprenticeship training is part of the Vocational Education and Training (VET) system which, itself, is part of the Further Education and Training\(^9\) and the Higher Education and Training sectors. VET takes a variety of forms in each country and often within each country and Ireland is no exception. Consequently, the Irish apprenticeship system is, in common with other jurisdictions, an outcome of country-specific institutional arrangements and value systems.

The Standards Based Apprenticeship system was introduced in 1993. It could be classified, as it were, as a stage 3 model in the evolution of apprenticeship in Ireland. It replaced the 1\(^{st}\) year off-the-job system\(^10\) introduced under AnCO (this was a three-year or four-year apprenticeship depending on the level of 2\(^{nd}\) level educational attainment but with minimum entry qualifications applying namely, any three subjects at Group or Inter Cert).

As part of this system ‘AnCO-sponsored’ places were provided for a small number of

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\(^9\) White Paper on Adult Education (2000), p 27-28, defines further education as that which occurs between second and third level e.g. Post Leaving Certificate courses and Adult Literacy. It also defines continuing education and training, inter alia, as the vocational development of people re-entering the workforce regardless of level. See also the Further Education and Training Bill, 2013, Part 1, Section 2, (30), which states that further education includes further education provided for the purpose of obtaining an award at a level that is not higher than level 6 specified in the NFQ.

\(^10\) The 1\(^{st}\) year (12 months) was conducted in an approved apprentice training centre, either within the education system, within industry or in ANCO training centres. Length of training period varied depending on the craft determined by the curriculum designed for that apprenticeship.
apprentices who were not employed during the first year. These apprentices trained alongside apprentices sponsored by an employer. Following their first year phase, AnCO endeavoured to match apprentices with suitable employers. AnCO certified the apprentice. The ‘AnCO’ system itself replaced a situation whereby the majority of apprentices tended, in the main, to experience on the job training which was largely unplanned, unsystematic and uncontrolled \(^{11}\). With regard to the introduction of the AnCO system

‘...All Apprentices, during the first three years of apprenticeship shall attend without loss of pay, specified courses of instruction in Vocational Schools and Technical Colleges, these courses to cover some practical training and theoretical and related and general education as agreed between employer, trade union, education and training interests. The duration of these courses shall be the equivalent of at least one day per week for the academic year of 36 weeks in each of the first three years of apprenticeship and the organisation of the courses shall be flexible to meet particular needs. It shall be mandatory for apprentices to attend these specified courses and the employer shall be obliged to release the apprentice without loss of pay... \(^{12}\)

The introduction of the new SBA model came about in context of the 1987 Programme for National Recovery that ushered in a period of fiscal rectitude to address an enormous debt (due to borrowing). This led to government, employer and union co-operation on a range of reforms, including apprenticeship. The Programme for Economic and Social Progress (PESP) gave backing to the successful implementation of a 1989 report on apprenticeship\(^ {13}\). Apprenticeships were to be standards-based with precise specifications of competence levels; it became mandatory for new craftworkers to hold a Craft Certificate to be deemed qualified; and a good balance between ‘on-the-job’ learning and ‘off-the-job’ education was to be provided; employers were to effectively sponsor the programme, recruit and provide an employment contract and monitor in-company training\(^ {14}\).

The SBA is a modular, standards-based alternating system, normally consisting of 7 phases of education and training for employed apprentices. It consists of minimum time periods for each phase of training that generally take an apprentice a minimum of 4 years to complete. These alternating phases of training typically consist of three off-the-job phases and four on-the-job phases. The duration of three off-the-job training phases does not generally exceed 40 weeks. Apprentices are provided, during the training periods, with the skills, knowledge and competence required to perform effectively as a craftworker in industry.

FÁS believes that the current standards-based dual-system apprenticeship model is the most appropriate model for Irish businesses. SMEs (<250 persons) account for almost 99.8% of active enterprises in the Irish economy, 69.1% of persons engaged, 51.5% of turnover and 46.8% of gross value added\(^ {15}\). SMEs employ almost seven in every ten apprentices.


\(^{12}\) Ibid.


\(^{15}\) Business in Ireland, CSO, 2012.
persons in the business economy. The majority (around 90%) of enterprises, in the economy, are microenterprises with less than 10 persons. A further 8% are other small enterprises with between 10 and 49 persons, the remaining 2% are classified either as medium or large enterprises.

While the current apprenticeship model displays some commonalities with apprenticeship systems in other jurisdictions, particularly countries with low youth unemployment (see below), the SBA currently also exists in a context of deeply embedded pathways within the Irish senior cycle secondary education framework in Ireland and in a context where the level of vocational education in Ireland is approximately one-third of the OECD average.

These pathways do not esteem VET and place a premium on 3rd level academic education. The lack of esteem for VET, if anything, appears to be as strong as ever in the attitudes of 2nd level students. This is of concern to FÁS when it is now accepted that to compete on the quality of goods and services that Ireland provides, a well-skilled labour force is required, with a range of mid-level trade, technical and professional skills alongside those high-level skills associated with university education. These mid-level skill more often than not, are delivered through vocational programmes. The SBA has been and still is a very effective way of delivering such skills in Ireland.

A follow-up study (2007) of a sample of 7,000+ apprentices by FÁS who started their apprenticeship in 1999 and a study by the construction sector (2005) found very high levels employment in the trade that they trained and studied for and high levels of satisfaction with the apprenticeship programmes overall.

Educational structures
With regard to institutional structures, Eurostat’s study ‘Key Data on Education in Europe’ 2002 expressed the view that, in Ireland all school students are in compulsory general education as no separate vocational stream exists. While this is definitely the case at lower secondary level, the system at upper secondary level is more complex, although general education still predominates. At the end of compulsory schooling at age 16, the majority of students proceed to upper secondary education (or the Senior Cycle). The chart below outlines the different types of vocationally orientated educational programmes at upper secondary level and corresponding ISCED levels.

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16 ‘Young People and Vocational Choices in Ireland’ City and Guilds Centre for Skills Development June 2013
At the end of compulsory schooling, the majority of students proceed to upper secondary education (or the Senior Cycle). This consists of an (optional) Transition Year followed by one of three versions of the two-year Leaving Certificate programme although not all versions are offered in every school. There are three, two-year, ring-fenced, full-time Leaving Certificate programmes - the Leaving Certificate (established) the Leaving Certificate Applied Programme (LCAP) and the Leaving Certificate Vocational Programme (LCVP).

The focus of the Leaving Certificate (established) is primarily academic and its main emphasis currently is on providing students with the necessary education required for entry into third-level and higher education. The Leaving Certificate (established) is undertaken by the majority (nearly two thirds) of Irish students in the senior cycle. The LCAP is structured around three elements – Vocational Preparation, Vocational Education and General Education. On completion of the programme, participants generally proceed to Post-Leaving Certificate vocational education and training courses or directly to the labour market.
The LCVP prepares learners for further and continuing education and for the world of work. The (LCAP) and the (LCVP) are considered to have IVET elements, although the LCAP is more vocationally-oriented than the LCVP. However, significantly, neither of these programmes is classified as initial vocational training. As with the Leaving Certificate (established) both Programmes are assessed by an examination set by the State Examinations Board.

On completion of the senior cycle, students sit for the Leaving Certificate (established), the Leaving Certificate Vocational Programme or the Leaving Certificate Applied examinations. The National Council for Curriculum and Assessment (NCCA) is responsible for defining the curricula in early childhood education and in primary and post-primary schools. The work of the NCCA is carried out by a number of specialist committees, comprising teachers, inspectors, representatives of teacher unions and school management bodies, parent and subject associations and higher education interests including universities and other colleges. These committees draw up the syllabus or course for each subject or part of the curriculum.

The State Examinations Commission (SEC) is responsible for the development, assessment, accreditation and certification of the second-level examinations of the Irish State. The SEC is a non-departmental public body under the aegis of the Department of Education and Skills.

With regard to assessment, the Leaving Certificate Vocational Programme (LCVP) consists of Leaving Certificate subjects, together with compulsory link modules. The Link Modules are assessed in a written examination representing 40% of total marks and a portfolio of coursework representing 60% of total marks. Students receive the same certificate as other established Leaving Certificate students, but their Leaving Certificate includes an additional statement of the results of the Link Modules (Pass, Merit or Distinction). The LCVP gives students the same opportunity to proceed to universities and colleges as the students taking the established Leaving Certificate. Assessment of the Leaving Certificate Applied is continuous throughout the course and there is also a final examination. Assessment takes place on the completion of modules and practical activities that allow the student to integrate the learning from different courses.
Apprenticeship structures in other jurisdictions

The following data provides;

A. A summary of the key features of apprenticeship type schemes in other EU jurisdictions
B. The distribution of work based training and school training in the main national EU apprenticeship schemes
C. Key features of regulated apprenticeship in selected G20 countries 2011
D. Details of the structure of apprenticeship in 3 sample countries

A. The key features of apprenticeship type schemes in other EU jurisdictions include;
   - In all Member States (MS), schemes at upper secondary level tend to include workplace training
   - In 24 of the MS, apprenticeship schemes can be described as company based with > 50% of training in companies
   - In 18 of these MS, company based apprenticeships coexist with other education based training schemes. Training of apprentices takes place at school most of the time, but there are significant components imparted at company level
   - In several countries, apprenticeship type schemes have been reformed to make them more flexible and closer to the needs of the production system
   - The countries with the highest number of individuals following apprenticeship-type schemes are Germany and France
   - In countries such as Denmark, Switzerland and Germany the majority of the apprentices attend apprenticeship schemes in a strict sense (dual system)

Types of schemes – summary

<table>
<thead>
<tr>
<th>Country</th>
<th>Type of Scheme</th>
</tr>
</thead>
<tbody>
<tr>
<td>Denmark</td>
<td>Demand Led (companies offer places and select students)</td>
</tr>
<tr>
<td>Estonia</td>
<td>Mixed systems</td>
</tr>
<tr>
<td>France</td>
<td>Mixed systems</td>
</tr>
<tr>
<td>Germany</td>
<td>Demand Led (companies offer places and select students)</td>
</tr>
<tr>
<td>Poland</td>
<td>Supply led (VT centres seek companies and offer students)</td>
</tr>
<tr>
<td>Spain</td>
<td>Supply led (VT centres seek companies and offer students)</td>
</tr>
<tr>
<td>Switzerland</td>
<td>Demand-led (companies offer places and select students)</td>
</tr>
<tr>
<td>The Netherlands</td>
<td>Demand led (companies offer places and select students)</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>Mixed Systems</td>
</tr>
<tr>
<td>Ireland</td>
<td>Demand led (companies recruit apprentices to meet their business needs)</td>
</tr>
</tbody>
</table>
### Distribution of work based training and school training in the main national EU apprenticeship schemes

<table>
<thead>
<tr>
<th>Country</th>
<th>% Work based training</th>
<th>%School based training and time distribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Denmark</td>
<td>65%-90%</td>
<td>10%-35% Blocks 5-10 weeks</td>
</tr>
<tr>
<td>Estonia</td>
<td>66%</td>
<td>33% Flexible arrangements</td>
</tr>
<tr>
<td>France</td>
<td>66%</td>
<td>33% 2-3 weeks company/1 week VT centre</td>
</tr>
<tr>
<td>Germany</td>
<td>60%-80%</td>
<td>20%-40% 1-2 days/week</td>
</tr>
<tr>
<td>Poland</td>
<td>4-6 summer weeks</td>
<td>Whole academic year</td>
</tr>
<tr>
<td>Switzerland</td>
<td>60%-80%</td>
<td>20%-40% 1-1.5 days per week</td>
</tr>
<tr>
<td>Spain</td>
<td>20%-30%</td>
<td>70%-80% At the beginning of the training cycle</td>
</tr>
<tr>
<td>The Netherlands</td>
<td>&gt;=60%</td>
<td>&lt;=40% 1-2 days /week</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>&lt;=70%</td>
<td>&gt;=30% 1 day/week</td>
</tr>
<tr>
<td><strong>Ireland</strong></td>
<td><strong>&gt;=80%</strong></td>
<td><strong>&lt;=20%</strong> Generally 40 week’s off-the-job training in blocks i.e. Phase 2 = 20 weeks, Phases 4 &amp; 6 = 10/11 weeks each</td>
</tr>
</tbody>
</table>
C. Key features of regulated apprenticeship in selected G20 countries 2011\(^\text{19}\)

<table>
<thead>
<tr>
<th>Country</th>
<th>Duration</th>
<th>Business and Services in top 3</th>
<th>% Female</th>
<th>Apprentice s per 1,000 employed</th>
<th>%&lt;25</th>
</tr>
</thead>
<tbody>
<tr>
<td>Australia</td>
<td>1-3 Y</td>
<td>34</td>
<td>40</td>
<td>54</td>
<td></td>
</tr>
<tr>
<td>Austria</td>
<td>3-4 Y</td>
<td>34</td>
<td>32</td>
<td>100</td>
<td></td>
</tr>
<tr>
<td>Canada</td>
<td>2-5 N</td>
<td>15</td>
<td>30</td>
<td>20</td>
<td></td>
</tr>
<tr>
<td>Denmark</td>
<td>3-4 Y</td>
<td>46</td>
<td>27</td>
<td>65</td>
<td></td>
</tr>
<tr>
<td>France</td>
<td>3-4 N</td>
<td>31</td>
<td>17</td>
<td>97</td>
<td></td>
</tr>
<tr>
<td>Germany</td>
<td>3-3.5 Y</td>
<td>41</td>
<td>39</td>
<td>92</td>
<td></td>
</tr>
<tr>
<td>Italy</td>
<td>3 Y</td>
<td>43</td>
<td>24</td>
<td>60</td>
<td></td>
</tr>
<tr>
<td>Indonesia</td>
<td>1-3 N</td>
<td>42</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Turkey</td>
<td>2-3 ?</td>
<td>20</td>
<td>N/A</td>
<td>90</td>
<td></td>
</tr>
<tr>
<td>UK</td>
<td>1-3 Y</td>
<td>54</td>
<td>20</td>
<td>60</td>
<td></td>
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<tr>
<td>US</td>
<td>1-4 N</td>
<td>N/A</td>
<td>14</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Switzerland</td>
<td>3-4 Y</td>
<td>42</td>
<td>44</td>
<td>100</td>
<td></td>
</tr>
<tr>
<td>Ireland</td>
<td>4 N</td>
<td>2</td>
<td>10</td>
<td>79</td>
<td></td>
</tr>
</tbody>
</table>

D. Structure of apprenticeship in 3 sample countries

**GERMANY**

**Structure:**

- Apprenticeship in Germany lasts approximately **3 years** on average
- An Apprentice must spend at least 1.0-1.5 days a week on average training in the vocational school
- German firms recruiting apprentices do not receive direct funding from public funds. Enterprises cover their own training costs (apprenticeship pay, cost of trainers, material etc.)
- Government funding of schools
- The apprentice earns a salary which increases every year and is on average one third of the starting wage for a skilled worker
- Public funds are also available to assist groups of small firms to set up and run joint training facilities (Group Training Associations)
- Some government financial support is available for training firms. Companies employing a trainee (beginning between July 2008 and December 2010) who has been searching for a training company for at least one year without success can receive a bonus of up to €6,000\(^\text{20}\)

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FINLAND

Structure:
- Training provided by Upper Secondary Level vocational institutions.
- **Initial Vocational Qualification**: Average duration of Studies 3 years
- **Further Vocational Qualification**: Average duration of studies 4-12 months
- **Specialist Vocational Qualification**: Average duration of studies 4-12 months
- Approximately **70-80% of the time** is spent in the training workplace under the responsibility of **on-the-job** instructors
- Training is financed by the state. The annual subsidy paid for one apprentice is calculated from the average costs of vocational training in Finland, and it is 80% of this average cost. The costs of upper secondary VET in 2007 were on average €8,400 per student
- The state is responsible for fully covering funding - 100% of the unit cost confirmed by the Ministry of Education & Culture
- Apprentices on off-the-job training receive a daily allowance, family allowance and transportation and accommodation allowances from the state
- Employer pays apprentice a wage, approximately 80% of skilled workers wages in that particular field. Employer is not obliged to pay wages for time spent in theoretical training
- Vocational Education providers receive statutory government transfer to cover the operating costs on the basis of unit prices determined by the Ministry of Education & Culture. The transfer is calculated to cover 42% of the operating costs on average. The unit prices are scaled per provider
- Some providers also receive performance-related funding based on Effectiveness (transfer to labour market), Processes (Drop Out rate) and Staff Qualifications. The performance based funding does not exceed 3% of the total amount of government transfer
- The state grants training compensation for the employers, which is compensation for the training given at the workplace. The amount of training compensation paid to the employer is agreed upon separately for each apprenticeship contract before the contract is approved
**NORWAY**

*Structure:*
- **2+2 Model - 2 Years education** and training in school followed by **2 years apprenticeship in an enterprise**
- The apprenticeship training is funded from public budgets and the training enterprises receive a state grant for each apprentice (in 2009: €11,347 over two years)
- Apprentices in upper secondary IVET are entitled to grants and subsidised loans through the State Education Loan Fund, if they come from low income families. They also receive a subsistence grant if they live away from home.
- In addition to the basic subsidy, the training company receives approximately €5,000 per apprentice in traditional crafts, for example a trade which may die out due to lack of recruitment, or a trade with inherent cultural value.
- In 2009 enterprises employing apprentices were granted €600 per apprentice. This is in addition to the ordinary grant of €11,000 designed to advance an apprentice with training rights to his or her qualifying examination. This measure may have contributed to ensuring the intake of apprentices has only fallen marginally.
- Apprentices are entitled to a salary agreed through a centralised system of collective bargaining. The salary corresponds to the productive content of the work involved. Since productivity increases throughout the 2 year apprenticeship, the salary increases accordingly. Salary increases from 30% to 80% of a skilled worker’s salary occur during the two years of apprenticeship.

**Area 2. Looking forward, what changes would you recommend in a re-structured or fundamentally reformed apprenticeship system in regard to any or all of the issues below. Please feel free to consider a significantly broader approach which embraces a wide range of occupations, and provides for different modes of funding and delivery.**

**Governance**

1a. Should future apprenticeships have a statutory underpinning? What aspects, if any, should be statute regulated, and what aspects should be market or stakeholder controlled?

The apprenticeship scheme in Ireland is a dual system of alternating periods of training and education presently managed by FÁS with the support of employers, trade unions and the education sector through Institutes of Technology and Colleges of Further Education. There are a number of key Government reforms currently underway in the Further Education and Higher Education sectors which need to be considered in relation to their impact on the apprenticeship programme. These are:
- The Government decision to establish SOLAS as the new Further Education and Training Authority.
The transition of the FÁS training centres into the recently established Education and Training Boards

Proposals set out in the ‘Hunt’ Report with regard to the development and evolution of Institutes of Technology into a smaller number of stronger amalgamated institutes, and application for re-designation for some, as technological universities

In view of the reforms proposed it would be desirable that Apprenticeship programmes remain within the further education and training sector, with appropriate contributions and support from the higher education (Institute of Technology) sector.

**SOLAS**

**Statutory**


The apprenticeship to operate in line with the current rules of the apprenticeship system which include:

a. Apprentice minimum age  
b. Apprentice minimum entry requirements  
c. Apprentice on and off-the-job training  
d. Compliance with contractual agreement by both parties  
e. Companies must be deemed suitable to train apprentices  
f. Standards and certification  
g. Classes of apprentices

Consideration to be given to augment the existing regulations as follows:

- An apprenticeship contract enforceable in law is a fundamental condition of the protection of apprentices’ interests
- Additional legislation, if considered to be required, ought to build on the existing legislative framework and Apprenticeship Rules with a renewed focus on safeguarding /strengthening / securing the rights of the apprentice to high quality training and protection from exploitation, recognising the unique status of the apprentice as a ‘learner/employee’, setting out the apprentice’s right to a training allowance commensurate with their productive contribution net of training costs

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21 On July 1st 2013, 33 VECs were merged into 16 newly established Education and Training Boards.  
1b. How and who should be involved in planning, curriculum development, support, regulation and monitoring of apprenticeships to ensure compliance with national objectives (Quality assurance to be through Quality and Qualifications Ireland (QQI))?

**SOLAS**

SOLAS would be required to undertake the following functions;

**National Programme Management and Administration**
- National Programme Policy Development and Management
- National Apprenticeship Management System (IT System)
- National Register of approved employers and apprentices
- National monitoring of Memorandum of Understanding with approved training providers

**Planning**
- National Forecasting and monitoring of apprenticeship intake
- National capacity planning and co-ordination with ETBs and HEA for the delivery of training and assessments for Phase 2, Phase 4 and CDM
- National Curriculum and Assessment development and administration in co-operation and with support from ETB’s and IOT’s

**Quality Assurance**
- Quality Assurance requirements of the apprenticeship programme to be set by QQI, and providers of elements of the programme will each have to meet the appropriate quality assurance requirements. SOLAS will work with QQI to ensure appropriate QA arrangements are in place

**Education and Training Boards (ETB’s)**

The Educational and Training Boards would be required to undertake the following functions:

**Programme Co-ordination**
- Apprenticeship Programme operational delivery and administration in designated geographical areas in accordance with SOLAS and ETB agreements

**Registration**
- Registration and induction process for all individuals as apprentices and associated administration
- Approval of employer to train apprentices and approval of employer assessor/verifiers and associated administration
Scheduling
  o ETBs to schedule apprentices for all off-the-Job Phases (including CDM) and assessment results processing

Delivery
  o Apprenticeship Programme Phase training and assessment delivery and assessment processing (incl. referrals and competency determination mechanism (CDM))
  o Delivery of special temporary supports for redundant apprentices (i.e. Redundant Apprentice Placement Scheme)
  o Tracking and monitoring of apprentice progress through all phases of their apprenticeship and maintenance of National Apprenticeship Management System Database and associated administration and reporting. Undertake inter ETB’s administration for apprentice employer transfer and other related administration
  o Assessment verification and processing for all on-the-job Phases in compliance with Memorandum of Understanding and Code of Practice for employers and apprentices
  o Administration of Results Approval Process and submission to QQI on completion of apprenticeship
  o Administration of Award Presentations
  o Administration of Recognition of Prior Learning Applications prior to submitting to SOLAS, taking into account the FET Policy and Procedures around the operation of RPL and possible resource implications. For further details of these procedures, see http://www.fetac.ie/fetac/documents/RPL_Policy_and_Guidelines.pdf
  o Registration and payment of allowances to apprentices for all off-the-job phases and associated administration
  o Assistance and co-operation in curriculum and assessment development as required

Monitoring
  o Monitoring of Employers who have apprentices registered in accordance with Code of Practice, and follow up corrective actions where necessary
  o Monitoring of attendance at off-the-job Phases including provision of feedback to employers by the completion of progress reports
  o Provision of management information on apprenticeship programmes

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23 Assessment mechanism to determine the overall competence of the apprentice against agreed learning outcome standards. For eligible redundant apprentices who have successfully completed Phases 1-7 but have a time deficit in meeting the minimum requirement of 4 years (208 weeks) for the Award of the QQI Level 6 Advanced Certificate-Craft.
Higher Education Sector (IOTs)
Higher Education Sector (IOT’s) would be required to undertake the following functions:

Programme Co-ordination
Apprenticeship Programme operational delivery and associated administration in accordance with SOLAS/IOT’s agreed Memorandum of Understanding.

Delivery
- Apprentice Programme Phase training and assessment delivery, and assessment processing in accordance with Memorandum of Understanding
- Administration associated with apprentice participation in off-the-job training in co-operation with ETBs including, induction, attendance monitoring, and completion of progress reports for feedback to employer
- Apprentice Programme assessment administration and liaison with ETBs
- Apprentice Programme administration of apprentices referral re-sits in co-operation with ETBs
- Provision of administration and management information to ETBs and SOLAS
- Training and assessment of Recognition of Prior learning Applicants
- Provision of progression options for qualified Craftworkers
- Assistance and co-operation in curriculum and assessment development as required

Curriculum and Assessment
FÁS established the National Apprenticeship Advisory Committee (NAAC) which represents apprenticeship stakeholders, to advise the Board on apprenticeship matters. All recruitment data, proposal for new trades, curriculum development (which includes consultation with QQI) and examination issues are placed before the NAAC for consultation and advice to the FÁS Board. In 2008, the NAAC established the National Assessment Review Committee (NARC) to advise it on matters relating to curriculum and assessment and other curriculum related matters. In that regard the National Assessment Review Committee (NARC) has set out recommendations based on the Strategic Aim of its assessment system, which

...

provides an effective and efficient process for determining the extent to which apprentices achieve the standards of knowledge, skills and competence implicit in the Award Descriptor and in the generic aims of the Apprenticeship Programme...


The current review of the curriculum is being undertaken on a phased basis in consultation with all stakeholders, to include, in the revised curricula, the recommendations of the NARC outlined in Appendix 1 with the exception of the recommendation of “Pass by Compensation”.

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1c. What would be the most effective system of governance to combine long term system and brand stability with an agile response to national needs? How can governance arrangements be simplified/streamlined?

**SOLAS**

Apprenticeship programme to be led, managed administered by SOLAS and with the support of the ETB’s and IOT’s the following would be provided to ensure an effective apprenticeship system of training and education.

**National Programme Management and Administration**
- National Programme Policy Development and Management
- National Apprenticeship Management System (IT System)
- National Register of approved employers and apprentices
- National monitoring of Memorandum of Understanding with approved training providers

**Planning**
- National Forecasting and monitoring of apprenticeship intake
- National capacity planning and co-ordination with ETB’s and HEA for the delivery of training and assessments for Phase 2, Phase 4 and CDM
- National Curriculum and Assessment development and administration in co-operation and with support from ETBs and IOTs

**Quality Assurance**

Quality Assurance requirements of the apprenticeship programme to be set by QQI, and providers of elements of the programme will each have to meet the appropriate quality assurance requirements. SOLAS to work with QQI to ensure appropriate QA arrangements are in place.

2a. How can a better gender balance be achieved in apprenticeships?

**Equity**

In Ireland, there has been limited success in attracting females into the standards-based apprenticeships system. One of the reasons for this may be that the types of Apprenticeship available tend to lead to occupations in traditionally male dominated sectors. Despite the offer of bursaries and campaigns to entice women to enter apprenticeship, the number of women taking up an apprenticeship offer in the traditional occupations where apprenticeships exist is quite small\(^{24}\). However, young womens’ choice of apprenticeship occupations in other jurisdictions has tended to be in the business and service sectors (that do not yet exist in Ireland) A more diversified selection of apprenticeships which would include occupations that could be attractive to young women could be considered.

\(^{24}\) Tackling Long-Term Unemployment Amongst Vulnerable Groups OECD 2013. See also Overview of apprenticeship systems and issues, ILO contribution to the G20 Task Force on Employment November 2012(revised from September).
To support the level of participation by women in apprenticeship

- DSP Employment Services and Career Guidance Services in schools could highlight to young people the opportunities in Apprenticeship, and the kinds of jobs they can lead to
- To promote the entry of women into the designated apprenticeships, a bursary to employers to encourage an increased level of recruitment of female apprentices could be maintained
- A ‘Pairing -System’ - whereby two female apprentices can learn together and thereby support each other throughout their apprenticeship - could be considered and piloted and with the necessary level of resources and mechanisms made available to facilitate such an initiative

2b. How can education and training and labour market entry routes for early school leavers, and those ill equipped for direct entry to more academically oriented FE and HE programmes, be best protected and expanded?

2c. How can the interests of persons with disabilities be advanced within future apprenticeships?

Response to questions 2b and 2c.

The National Apprenticeship Advisory Committee (NAAC) - which represents apprenticeship stakeholders and whose role is to advise the FÁS Board - established an apprentice review process in 2002. The Gilbert Report *Making Apprenticeship Work*, NAAC, 2002, which it commissioned, advised that the broadening of access to apprenticeship was required. It suggested that measures should be introduced to ensure easier access to apprenticeship for categories of people not traditionally associated with such training, including consideration of:

- The structure and content of pre-apprenticeship programmes for non-typical entrants including those for older workers
- Bridging or introductory programmes for applicants who have subject competency deficits or for long-term general operatives wishing to progress
- Recognition of skills acquired in earlier stages of an applicant’s life
- Financial support for older workers entering apprenticeships
- Supports for apprentices from particular disadvantaged groups at present under-represented in apprentice training
- The educational requirements for entry to apprenticeship training should be re-examined
- Initiatives should go beyond simply ensuring compliance with equality legislation to actively promote diversity in apprentice intake
People with a disability, who meet the entry requirement, can apply directly to employers for apprenticeship places. Where persons with disabilities do not meet the entry requirements, they could still be registered as apprentices by employers on successful completion of an approved preparatory training course.

A range of supports are currently offered to employers from DSP:
- Disability awareness training support scheme
- Employee retention grant scheme
- Job interview interpreter grant
- Personal reader grant
- Employment support scheme
- Workplace equipment/Adaption grant

The National Disability Authority are currently developing a strategic plan with regard to people with a disability, which as FÁS understands, will include a focus on improving access to training and to employment. FÁS/SOLAS will actively engage with the NDA with regard to how best the interests of persons with a disability within apprenticeship can be advanced.

With regard to providing an inclusive apprenticeship more generally - increasing the uptake of persons with learning difficulties, medical conditions, disabilities etc., to access and successfully complete an apprenticeship - a number of principles and actions remain pertinent. Firstly, quality apprenticeships must facilitate participation by all individuals facing learning challenges including disadvantaged youth. Secondly, additional subsidies can be considered for employers hiring all categories of workers with learning challenges. Thirdly, crucial to increasing the participation in Apprenticeships for learners with a learning disability and the participation for under-represented groups, would be a high-support ‘Pre-Apprenticeship’ course.

A current example of a Pre-apprenticeship course is one aimed at supporting young people who may or may not have achieved the minimum educational entry requirements required to become an apprentice. The subjects in this case which must be taken and passed are: Craft Science, Craft Maths, Technical Drawing, Engineering. On successfully passing exams, trainees can register with FÁS for the purpose of their apprenticeship, and to be notified to potential employers who are recruiting apprentices.

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25 ‘Creating an Inclusive Apprenticeship Offer’: UK Department for Education and UK Department for Business and Innovation 2012. See also Support and aspiration: a new approach to special educational needs and disability. UK Department for Education (March 2011).

More specifically with regard to persons with a learning difficulties, medical conditions, disabilities etc;

- Self-declaration recording processes and methods need to be sophisticated enough so that disabilities and learning difficulties are correctly disclosed/self-declared and recorded\(^{27}\)
- The numbers of Apprentices declaring a learning difficulty and/or disability should be closely monitored and an appropriate response to trends implemented accordingly
- The sharing of good practice should be targeted to other areas such as mental ill health, emotional/behavioural difficulties, profound and complex disabilities and multiple disabilities
- Funding arrangements for employers to facilitate support required in the workplace should be reviewed. On the job one-to-one support (as well as effective brokerage with employers) both in terms of job coaching but also mentoring is critical to success for Apprentices with a learning difficulty etc. Mentoring has been shown to be particularly effective for these Apprentices, some of whom may have limited experience of the workplace, while others may have difficulties integrating themselves into a team. Mentors are also important in that they can monitor progress and spot signs of distress or simply identify where the Apprentice might be struggling
- Explore with organisations led by disabled people how innovative new models of Apprenticeships might be developed and funded

More specifically with regard to Disadvantaged Youth;

Youthreach is part of the national programme of second-chance education and training in Ireland and is aimed at unemployed young early school leavers aged 15-20. It offers participants the opportunity to identify and pursue viable options within adult life, and provides them with opportunities to acquire certification. It operates on a full-time, year-round basis. Youthreach is funded by the Exchequer under the National Development Plan.

The Department of Education and Skills delivers Youthreach through Centres for Education managed by ETBs (formerly Vocational Education Committees) and via a network of Community Training Centres (CTCs) funded by FÁS.

Within the CTC network, there is now a stronger focus on the provision of funding tied to results in terms of increased levels of progression and placement and offering personal and social skills development through modules such as communications, personal

\(^{27}\) Currently, individuals who may have special requirements and need support i.e. dyslexia, numeracy, literacy, physical disabilities or a medical condition, have a responsibility to inform FÁS at the time of registration so that these needs can be catered for attending off-the-job training. If additional learning supports in learning techniques, maths/science/drawing, practical work are required then individuals can log on to http://www.fas.ie/ and go to eCollege or contact FÁS evening classes, an Institute of Technology, local VEC, evening classes or seek private tuition.
effectiveness, teamwork, career planning and literacy and numeracy support which are integrated with the vocational training modules.

Independent advice and guidance (IAG) is important to connect early school leavers with the world of work and the range of support services including vocational training they require to help them prepare for work.

With regard to the latter, the current FÁS Pre-Apprenticeship course is aimed at young people who may or may not have achieved the minimum educational entry requirements but who want to become an apprentice. On successfully passing exams, trainees can register with FÁS for the purpose of meeting the pre-requirements of their chosen apprenticeship. The subjects which must be taken and passed are: Craft Science, Craft Maths, Technical drawing, Engineering.

In summary, a Pre-Apprenticeship course can be an effective intervention to protect the education and training and labour market entry routes for early school leavers etc. into apprenticeship (providing other pre-requirements are met e.g. colour vision).
Range of Occupations

3a. Should the range of occupations covered by apprenticeship/traineeships be broadened outside the traditional craft industries? If so, what occupations/programmes should be covered and how would this be achieved? Please state why you consider these occupations suitable for apprenticeship.

FÁS is aware of the importance of maintaining and increasing the relevance and role of apprenticeship in meeting workplace skill needs, and acknowledges that not all interested employers participate in apprenticeship. Many employers need to be facilitated to take on apprentices while maintaining the quality of apprenticeship. FÁS also acknowledges that in such a situation the risks to the apprenticeship system, if the most innovative and attractive occupations are excluded, is significant. In that regard, FÁS has always endeavoured within its allocated resources and priorities, to support and encourage the expansion of apprenticeship occupations. In that regard, FÁS and the National Apprenticeship Advisory Committee currently have a process in place for the evaluation of new occupations to be included in Apprenticeship.

FÁS notes, for example, the scale and nature of the respective economies and number of regulated occupations in Germany (some 348) and in the US (1,000+), Switzerland and Austria (some 250) across both non-traditional sectors - such as banking, tourism, care, IT and office admin – as well more traditional sectors. FÁS also notes the high number of approved specialist apprenticeships applying to a specific occupational area in the US - for example there are some sixteen US Department of Labour approved specialist carpentry apprenticeships28.

FÁS also notes that in Australia for example, alongside traditional apprenticeship in the craft areas, what were previously known as traineeships have been grouped in with apprenticeships and renamed/rebranded as ‘apprenticeships’ at federal level – although some states are keen to keep both separate. More generally, traineeships within the EU tend to have a shorter-duration and learning outcome standards aimed at a lower level of skill than regulated apprenticeship.

The fluctuating (and relatively limited) capacity of the Irish labour market, to absorb outflows of skilled entry level workers from occupational specific training initiatives in a sustained way, can be demonstrated through the FÁS Traineeship programme.

Since 1995 FÁS has developed traineeships in some 40 occupational areas (see Appendix 2 for examples), of which approximately 20 remain available to be drawn down as required. Seven are currently being offered to meet client and employer needs in today’s economic business cycle. FÁS traineeships average 40 weeks full time and are generally at level 5 on the NQF, whereas regulated/designated apprenticeships are four years in duration and are

at level 6 on the NFQ (with some level 7 outcomes). The State funds the entire traineeship programme and there is less employer commitment for traineeship than exists for apprenticeship.

The FÁS "Traineeship Programme" was initiated in 1995 in the context of the EU Operational Programme for Human Resource Development. It was developed to relate the provision of initial VET for young labour market entrants and unemployed persons more finely to labour market and skill needs and to deepen the involvement of employers (and unions) in the design and delivery of this provision.

The White Paper on Human Resources Development published in May 1997 stated that it was the government's intention to "develop the Traineeship Programme as the primary vocational skills and pre-labour market entry programme for young labour market entrants". Particular priority, the White Paper stated, was to be given to promoting opportunities for those young people most at risk of falling into the ranks of the long-term unemployed, specifically early school leavers and those under 21 years of age who had been unemployed for some time.

The essential element of the Traineeship programme then remained the same as it is today namely, involvement of business with FÁS in:

- identifying training needs
- selection of participants
- development of curriculum/certification
- the delivery and financing of training

Traineeship was developed initially as a local or sectoral scheme to provide training on a regional basis using local resources of FÁS and industry. (On the other hand Apprenticeship is a national statutory scheme with direct social partnership involvement, with a nationally determined curriculum and employer levy in operation). Traineeships display some similarities with the FÁS Apprenticeship system in that they involve off-the-job training and workplace training as well as offering occupational certification approved by FETAC.

The skill training needs on which Traineeships are based are identified primarily from ongoing contacts between FÁS and employers locally and nationally and through the research conducted by the FAS Strategic Labour Market Research Unit (SLMRU). The company training component is overseen by a company mentor in respect of every trainee and a skills checklist must be signed off by the mentor when he/she is satisfied that the trainee can demonstrate the listed skills under operational conditions.

The original intention - that the modular structure of the programme and recognition of its certification would enable competent participants to progress to higher levels within the education and training system - still remains. In the longer term, it was deemed feasible that Traineeships could become the recognised route by which young and unemployed persons gain access to qualifications and jobs across a wide range of occupations and industry sectors. In addition, where it was deemed that sufficient industry support was
available and durable, traineeships could act as testing grounds for new apprenticeships e.g. Security Installation.

Traineeships are often of a ‘fixed time’ nature in the sense that the ability of the labour market/employers to provide in-company training and absorb trainees into employment is often limited and not sustainable over the longer term.

In some instances there is sustainable demand over the medium to longer term such as Healthcare Assistant, Childcare Worker and Outdoor Activity Instructor traineeships. Sometimes there is an immediate, substantial yet finite demand at a particular point in time for qualified new entrants due to the introduction of new legislation/licensing requirements as for example with the Financial Advisor Assistant Traineeship developed in conjunction with the Irish Insurance Brokers Association. Over a period of time, demand from brokers for new entrants weakened considerably. Other traineeships just suffered from diminishing employer commitment over the longer term, for example the Sales and Marketing Assistant.

Overall, the results relating to transferring traineeships into apprenticeships have, to date, been disappointing. For example, with regard to Electronic Security Systems apprenticeship and to the Jewellery apprenticeship (both of which were previously traineeships), employers in the Electronic Security Systems apprenticeship programme were only in a position to provide 8 apprenticeship places in 2012, while employers in the Jewellery sector were not in a position to offer the volume of sustainable places required, due to the economic recession.

Over the years independent reviews\textsuperscript{29} of Traineeship indicate the effectiveness of the FÁS model of Traineeship across economic peaks and troughs.

The most effective traineeships within the EU in particular appear to be those that are undertaken during training/education and those linked to well-structured Active Labour Market Programmes (ALMPs)- such as FÁS Traineeships. The main success factors of these traineeships are;

\begin{itemize}
  \item Their strong links with the labour market
  \item A well-structured approach
  \item Active engagement of stakeholders, including employers
  \item Robust quality assurance mechanisms
\end{itemize}

A number of challenges need to be overcome in successfully expanding the number of occupations covered by Traineeships in the current business cycle and are quite instructive with regard to the consideration of expanding apprenticeship into other occupations;

\textsuperscript{29} For example a review of the FÁS traineeship programme published in 1999 by the ESF Evaluation Unit (Dublin). See also The Forfás Review of Labour Market Programmes (2010) and the FÁS commissioned Follow-Up surveys of FÁS participants.
1. There can be uncertainty around the capacity/ willingness/commitment of industry sectors and companies to become involved and sustain their involvement in developing/piloting and implementing Traineeships (e.g. identification of training needs, module objectives, development of standards of skill knowledge and competence)

2. There is the need for clarification from QQI around the process of standards development for new occupations and FÁS understands that this will emerge as part of their strategy development process

3. There is a need for some financial support to some trainees, especially to assist them to undertake the substantial in-company training element of a traineeship

4. The question of how to underpin the quality of the on-the-job element of Traineeship to ensure a consistently high level of skill, knowledge and competence; and afford trainees the opportunity to apply the expertise they have acquired during on-the-job phases to a variety of appropriate tasks needs to be addressed

5. Formal and more widespread progression routes need to be examined and developed further, and the Traineeship model could also be mapped onto higher courses in the National Framework of Qualifications

6. It is essential that all Traineeship stakeholders develop a dynamic capability identifying areas of change in a developing economy, enabling the system to respond quickly and efficiently to meet its needs and introduce new curricula and certification reflecting this change

7. It should be noted that developing a single new Traineeship (or Apprenticeship) is resource intensive and can take a number of months as the provider must have suitable training plans, agreed learning outcomes, approved certification, training materials and recruitment and work placements/trained mentors in situ before course commencement date

In Ireland, the range of Apprenticeship occupations is mainly craft-related. The experience of FÁS over the years has been that it has proven extremely difficult to expand the apprenticeship model to other occupations or even to take a non-designated trade to designation, such as ‘Industrial Insulator’. A small number of new trades have been introduced in recent years but are mainly craft related e.g. Electronic Security Systems, Farriery and the amalgamation of Cabinet Making and Wood Machining (Wood Manufacturing & Finishing). After initial enthusiasm the ability of employers to commit to the apprenticeships tends to significantly diminish. **It is not clear how sustained employer commitment to new trades can be achieved over the medium to longer term.**

Notwithstanding this, a number of other new trades have been developed (but are not yet implemented) as follows; Stone Cutting, Pipe Fitting, Hairdressing, Jewellery - design and manufacturing. Other trades will be considered for implementation based on the level of economic activity in the sector and the industry commitment to supporting a sustainable level of registrations, as well as the willingness of employers to support apprenticeship training and development. In that context, FÁS continues to review the range of apprenticeship occupations and introduce, where appropriate, with the support of industry
and individual employers, new apprenticeship training programmes that have a wider
scope and encourage higher levels of female participation.

**Funding**

4a. How can the costs of apprenticeship be shared between apprentices, employers and
the State?

The financing of apprenticeship is both complex and critical for its viability. FÁS is of the
view that the benefits of the current apprenticeship system are shared by firms, by
apprentices and by society more generally and so the costs are shared accordingly. FÁS is
also of the view that the wider social and economic benefits justify a major public
contribution to the costs of apprenticeship. In that regard, public funding often takes the
form of part-time education/training centre based courses provided free of charge i.e. for
the ‘off-the-job’ training element, to employers for recognized apprenticeships. Ireland is
no exception. However, no matter how equitable the costs are shared, well run and well
supported and effective apprenticeship systems are costly but deliver value for money for
enterprises. Substantial state funding is a feature of the most developed apprenticeship
systems and where apprentices are recruited as full-time employees the return from
apprenticeship on the firm’s investment can be substantial\(^{30}\).

For example, with regard to the UK

...Training an Apprentice in engineering was relatively expensive compared to other sectors (estimated as
£28,762, on average, across the case studies) but such costs must be set against the potential benefits of
training. The engineering case studies indicate that the employers’ investment was, on average, paid back in
less than three years. More importantly, the evidence points to significant benefits to establishments from
investing in Apprenticeships through lower labour turnover, a better fit between the skills possessed by
employees and the skills required by the company, and some control over skill-shortages potentially pushing
up wage rates. There is also evidence of apprentices bringing innovation into workplaces...\(^{31}\).

If the apprentice is aged 16-18, the UK government funds 100 per cent of the cost of the
training; if the apprentice is aged 19+, the government funds up to 50 per cent. Government funding to cover the cost of apprentice training is not paid directly to the
employer unless the company has 5,000 employees or more but to the organisation that
provides the apprentice training; in most cases this will be a learning provider. There are
additional financial incentives (wage subsidies) available to small businesses which employ
16-18 year-old apprentices through one of the newly-established Apprentice Training
Agencies (ATAs).

With regard to state funding of apprenticeship outside of the UK\(^{32}\), the cost for example, of
off-the-job training in Austria for apprentices (one or one and a half days a week) is met

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\(^{30}\) ‘Overview of apprenticeship systems and issues’ – ILO contribution to the G20 Task Force on Employment;

\(^{31}\) Hasluck C., T. Hogarth et al., 2008, *The Net Benefit to Employer Investment in Training* Institute for Employment
Research, University of Warwick.

from public funds in publicly-provided vocational schools. Firms pay an ‘apprentice allowance’ which appears to be on average, a third of the gross earnings of a blue-collar worker. There are substantial variations by sector but at least two fifths of apprentice firms incurred no net costs of apprentice training.

Swiss firms do not receive a direct subsidy for taking an apprentice but the costs of the required off-the-job training in the vocational college - one or one and a half days a week - is also met out of a mix of federal and cantonal funds.

In Australia, most off-the-job apprenticeship training is outsourced to publicly-funded Further Education colleges (TAFE). Government funding is available at State and Federal level to support apprentice employers and apprentices. The most widely available federal benefit to employers who take on apprentices is a one-off payment of around $800 to an employer taking on an apprentice in 2010 plus a possible completion bonus of $1,400. A wide range of benefits are also available from federal government to assist apprentices, including a ‘living away from home’ allowance, allowances for tools and work clothing, financial support for adult apprentices and youth study allowances for younger apprentices.

In the US in contrast, albeit with some exceptions, sponsors [employers] tend to receive no public funding for the work-based learning or classroom-based components of apprenticeship. Apprentices contribute to the cost of their training by accepting lower pay relative to skilled workers in their sector and relative to what they could have earned in full-time employment without training.

Public funding for training in Ireland is channelled through the National Training Fund (NTF). The fund is fed from a levy on employers. The fund meets the full direct cost of off-the-job apprentice training at Phase 2 (excluding associated overheads and student service charge which are funded from the exchequer), and the cost of an allowance paid to apprentices in lieu of wages during all off-the-job training. FÁS also pays travel and accommodation expenses, where appropriate, to apprentices during their off-the-job training. Employers pay apprentice wages and the cost of work-based training which consists of three-quarters of any four-year apprenticeship programme. It is worth noting that apprentices contribute to tax and PRSI.

With regard to ‘on-the-job’ training, the potential of clusters of companies to combine resources to facilitate the inter-company movement of an apprentice(s) for relevant ‘on-the-job’ training inputs ought to be explored.

Finally, the rate(s) of ‘on-the-job’ apprentice wages within the Irish apprenticeship system is a matter best resolved within the existing industrial relations framework between the relevant stakeholders.

The OECD Overview of the Economic Survey of Ireland 2011 noted that “costs should [also]be cut by reviewing (trainee) allowances and the balance of job-specific training
between on-the-job and off-the-job phase.” The estimated State cost of apprenticeship provision (based on 2011 costs) over the four years of apprenticeship is set out below;

**Estimated State Cost of Apprenticeship**

<table>
<thead>
<tr>
<th>Annual Cost</th>
<th>Phase 2 €m</th>
<th>Phase 4 €m (e)</th>
<th>Phase 6 €m (e)</th>
<th>Total €m</th>
</tr>
</thead>
<tbody>
<tr>
<td>Delivery Costs</td>
<td>6.172</td>
<td>12.855 (e)</td>
<td>22.861 (e)</td>
<td>41.888</td>
</tr>
<tr>
<td>Allowance Costs</td>
<td>6.353</td>
<td>9.359</td>
<td>20.692</td>
<td>36.404</td>
</tr>
<tr>
<td>Support Costs</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>9.512</td>
</tr>
<tr>
<td>Total</td>
<td>12.525</td>
<td>22.214</td>
<td>43.553</td>
<td>87.804</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Throughput</th>
<th>Throughput per phase</th>
<th>1,175</th>
<th>2,247</th>
<th>3,996</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Cost per individual by phase</th>
<th>€</th>
<th>€</th>
<th>€</th>
<th>Total Individual Participation Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Delivery Costs</td>
<td>5,252</td>
<td>5,721</td>
<td>5,721</td>
<td>16,694</td>
</tr>
<tr>
<td>Allowance Costs</td>
<td>5,407</td>
<td>4,165</td>
<td>5,178</td>
<td>14,750</td>
</tr>
<tr>
<td>Support Costs</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>3,846</td>
</tr>
<tr>
<td>Total</td>
<td>10,659</td>
<td>9,886</td>
<td>10,899</td>
<td>35,290</td>
</tr>
</tbody>
</table>

**Notes:**

1. The off-the-job training element generally consists of 20 weeks at Phase 2, 10 weeks at Phase 4 and 10 weeks at Phase 6, a total of 40 weeks. Phase 2 is generally provided by FÁS and Phase 4 and Phase 6 is provided by the Institutes of Technology (IoT’s) and Colleges of Further Education (CFE) and funded by the HEA.

2. The HEA estimated costs are based on Unit Cost returns by IoT’s for the financial period 1st September 2009 – 1st August 2010. This data is then extended on a pro-rata basis to the Calendar Year 2011 based on the number of blocks delivered in each corresponding period. The data is also extended on a pro-rata basis to
provision in the two Colleges of Further Education involved. Therefore no account is taken of any changes in base costs in the period since 2009-10, (nor of any difference in costs between IoT’s and CFE’s) The total estimate HEA costs is €35.716m for 6,800 available places of which 6,243 places were utilised based on acceptance in 2011

3. Support costs are FÁS pay and the apportionment of overheads costs for central and regional management and administration for the Apprenticeship Programme

4. Apprenticeship expenditure does not include costs associated with Phase 7 Equivalents, Competency Determination Mechanism or Refresher Courses at a cost of €601,000

5. (e) = estimate phase delivery cost for Phase 4 and Phase 6

Apprenticeship is good value for money from the State’s perspective in comparison to other full time education and training programmes that are fully funded by the State. Nevertheless, funding arrangements could be reviewed with a view to delivering cost savings for the State but not at the expense of quality or the integrity of the apprenticeship system as a whole, or by eliminating sequential ‘on’ and ‘off-the-job’ training.

4b. How can the costs of expansion into new disciplines be best supported given economic constraints?
The costs associated with the expansion into new disciplines should be shared between the appropriate industry sector and the State in the same type of proportions as existing apprenticeships.

4c. Who should pay the learner (a) on the job (b) off the job?
Learners on an apprenticeship programme are actually employees not students. It is not feasible nor is it desirable that employees would not be paid while training off-the-job’ i.e. during working hours when they could be earning. Where employers are prepared to commit to ‘on-the-job’ training, the State should continue to pay a training allowance (subject to review) while the apprentice is attending ‘off-the-job’ training in a designated apprenticeship.

4d. Should pay or allowances vary by discipline?
This is a matter best addressed by employers (who fund the bulk of the cost of an apprenticeship through apprentice wages) and trade unions.

4e. What supports, if any, should be available for learners availing of off the job training away from home?
See above.

4f. Describe how the changes you propose will decrease or increase the costs of apprenticeship to Employers, apprentices or the State.
It is anticipated that existing funding arrangements for designated apprenticeships could be reviewed with a view to delivering cost savings for the State - but not at the expense of quality or the integrity of the apprenticeship system as a whole or by eliminating sequential ‘on’ and ‘off-the-job’ training. Providing more ‘apprenticeship type’ training
in addition to designated apprenticeships, in the form of viable and sustainable traineeships, could be cost effective given the absence of wage mechanisms for traineeships (trainees are not employed but may be entitled to DSP income supports while on their traineeship).

Recruitment
5a. Who should control recruitment to apprenticeships and how should this be done?

5b. Given that an agile response to labour market needs inevitably gives rise to peaks and valleys in demand, how can the impact of this on planning, infrastructural investment, and employment of trainers, be best catered for?

5c. Should State provision of training be decoupled from employer recruitment?

5d. How can the supply and demand for the different disciplines be most effectively planned?

In response to questions 5a-5d above.
The recruitment of apprentices, including matching employer demand for apprentices with provider training capacity, calls for

a) A register to be established of approved employers for the recruitment and training of apprentices with the objective of promoting compliance with, and commitment to, the apprenticeship programme. This is expected to avoid difficulties arising where an employer is not in a position to provide the full range of on-the-job training, and be compliant with the requirements for training apprentices in the specified trades

b) Only employers listed on the register can advertise and recruit on an annual basis for a pre-approved number of apprentices, based on the apprentice/craftsperson ratio for the employment concerned. Compliance with the criteria is a prerequisite for inclusion on the register

The criteria for inclusion on the new register will include for example qualifications of the supervising craftworker; the training plan for the apprentice, the range of work, equipment and facilities available; the apprentice/craftworker ratio and ability to undertake on-the-job assessments; attendance and completion of the Assessor/Verifier Programme; commitment to the apprentice for the duration of the apprenticeship programme; production of Tax Clearance Certificates (yearly); compliance with the assessment process and adherence to the Code of Practice. This will ensure that employers recruiting apprentices can meet the requirements for the training of apprentices in the specified trade, and can provide the level and quality of training required, based on the number of qualified craftworkers in the enterprise and that it can meet the requirements of the Code of Practice
c) A Register will be published which will be of assistance to those seeking employment as apprentices. This will provide information to individuals on employers who provide appropriate and high quality apprenticeship training opportunities, and will provide a pool of potential applicants for apprenticeships offered by these employers.

d) Annual forecast/estimation of industry requirements for apprentice registrations by trade to be undertaken by SOLAS in consultation with the relevant industry representative bodies and training providers to assist in planning capacity requirements within the annual budget framework. Following this consultation process, the target level of registrations will be set and published for the forthcoming recruitment cycle. Employers will be invited to submit by a defined date, applications for pre-approval to recruit apprentices in the recruitment cycle.

There will be defined registration dates, either annually or bi-annually depending on the trade. Where submissions for approval to recruit apprentices are below the target level expected from employers, public authorities and the general public sector may be requested to sponsor apprentices i.e. to employ an apprentice in the normal way. For non-public sector bodies, consideration may be given to appropriate supports to be provided by the State to qualifying employers to employ apprentices, in addition to their normal annual intake of apprentices.

These measures will take account of current State resources and future Labour market requirements. Where submissions for approval to recruit apprentices are in excess of the target level of registrations, and the industry submits a business case for additional registrations, SOLAS will in conjunction with Department of Education and Skills, and Department of Jobs, Enterprise and Innovation examine the feasibility of providing additional capacity within existing State resources.

Undertaking the annual forecast/estimation of demand by employers for apprentices by trade should continue, and will include formal consultation to reaffirm the employment forecast and needs of the sector, facilitating planning for off-the-job training in collaboration with the training providers. It is further proposed that trends in registration be monitored on a regular basis and the implications of emerging trends will trigger the appropriate policy responses.

e) An internal SOLAS capacity forecasting model is to be developed to support the national recruitment forecast. This will provide for improvements in the forward planning of capacity for off-the-job training by the development of a forecasting model.

Those to employers could include concessions or rebates on payroll tax or workers’ compensation premiums and targeted commencement and completion incentives. The incentives available to apprentices could include clothing and equipment allowances, concessions on the cost of car registration, and concession fares on public transport, accommodation and travel allowances for apprentices who must spend time away from home to undertake their off-the-job training, capped exam fees and cash payments for apprentices commencing in skills shortage occupations. Any such supports would need to be designed to guard against ‘deadweight’ and ‘displacement’ effects.
f) Apprenticeship model of training to be actively promoted to all stakeholders. The benefits of apprenticeship training to both the apprentice and employer should be promoted as a model for training in intermediate skills with opportunities for further progression.

g) Local authorities and the general public sector may provide supports for the recruitment of apprentices where the minimum level is not achieved in a recruitment cycle, or for certain categories of apprentices taking account of current State resources. Consideration to be given to non-public sector bodies supports to recruit apprentices in addition to the normal annual intake. The rationale for taking this position is that the apprenticeship programme is a demand led programme and is subject to the cyclical nature of the economy, in particular the construction industry.

h) It is proposed that where the minimum level is not achieved in a recruitment cycle, local authorities and the general public sector, taking account of current State resources, may provide opportunities for individuals wishing to pursue an apprenticeship career.

i) This would have the benefit of providing local authorities and the general public sector with an opportunity to increase their involvement in apprenticeship training, with consequential benefits for the workforce and service provision, as well as reducing youth unemployment.

5f. What should be the minimum entry requirements? Should these vary for individual occupations?

FÁS proposes the establishment of trade specific educational entry requirements which will inform the applicant of the subjects needed at Junior or Leaving Certificate level, or equivalent to enter specified apprenticeships. The adoption of trade specific entry requirements for some trades may minimise referrals and dropouts.

The provision of a broad-based high support Pre-Apprenticeship course for individuals (see FÁS response to questions 2b and 2c above) would seek to facilitate applicants who may not otherwise need the established trade specific entry requirements.

Compulsory eye test/medical examination to be introduced (and highlighted in the Career Guidance Process) for particular trades in addition to colour vision testing. The introduction of a compulsory eye test/medical examination is to ensure apprentices will be in a position to complete mandatory assessments, and to progress to completion of an apprenticeship without having to drop out later due to an underlying eye or medical condition. An example of the need to introduce this requirement might arise where a plumbing apprentice might not be in a position, based on medical advice, to undertake a mandatory assessment in welding at Phase 4, and consequently could not progress.

Entry requirements should be reviewed for mature entrants and for those who have not completed an official apprenticeship and the relevant examinations for craftworker status.
The requirement for mature entrants, especially for Recognition of Prior Learning applicants to obtain an employer, is a barrier to SBA entry and requires the introduction of supports for the employer in the provision of training opportunities.

5g. Should there be a probationary period?
Determining the suitability of an applicant for a position within a company, including an apprenticeship position, and the process/duration relating to this determination is a matter for the employer but should be concluded before the apprentice is taken on by the employer (i.e. before being offered an apprenticeship contract by the employer).

Curriculum
6a. What is the appropriate balance of (a) technical and occupational skills and (b) transversal skills, and what subjects should be added or strengthened in the programme? (e.g. Transversal skills could include mathematical skills, ICT, communications, literacy, teamwork, planning, research and evaluation skills).

The Apprenticeship Programme is a further education and training programme with certification provided to apprentices who reach the standards set by QQI, the Further Education Training and Awards Council. The Apprenticeship Programme at the establishment of the National Framework of Qualifications was placed at Level 6 - Advanced Certificate Craft. All QQI awards include a combination of technical/occupational skills and general skills such as problem solving and soft/core/essential skills such as communication skills.

The apprenticeship training and development programme for each trade is based on an Occupational Analysis of that trade. Each Occupational Analysis is reviewed at curriculum review stage to establish the skills, knowledge and competence required by craftworkers within the occupation.

The skills required for each occupation are categorised under the following headings:

1) Core Skills
2) Specialist Skills
3) Common Skills
4) Personal Skills.

This approach facilitates the development of training modules for each trade and the identification of common modules of training and development applicable to a number of occupations.

The off-the-job phases are delivered by a FÁS Training Centre, an Institute of Technology or a College of Further Education. The key factor in delivery of an off-the-job training phase is that it is delivered in a single training environment to ensure integration of practical skills training with the necessary theory, mathematics, drawing and personal skills.
During the on-the-job training phases the apprentice develops the competencies to apply the necessary skills, knowledge and attitudes to tasks or combinations of tasks to the required industrial standards under operational conditions.

The Gilbert Report\textsuperscript{34} in 2002 recommended that apprentices’ access to information technology (IT) in terms of both course content and delivery method should be improved. A number of steps were taken to increase access to Information Technology by the introduction of common modules in a self-learning format. The modules at the commencement of Phase 1 are as follows:

1. Health and Safety
2. Introduction to Learning to Learn
3. Introduction to ICT
4. Employment Legislation Awareness
5. Environmental Awareness

All common modules are mandatory for all apprentices registered from 1st January 2013. A further aid to apprentices, especially in the area of revision and access to refresher material, has been the development of learner resource materials (LRM). These are available through the FÁS on line learning system e-College. Apprentices are provided with a username and password on registration to facilitate ease of access and potential for accelerated learning. LRM are provided as a complementary aid to the direct instruction at Phase 2. Learner resource materials developed to date are as follows:

- Aircraft Mechanics (units developed to meet European Aviation Standards Authority requirements)
- Carpentry & Joinery
- Construction Plant Fitting
- Electrical
- Heavy Vehicle Mechanics
- Metal Fabrication
- Motor Mechanics
- Plumbing
- Painting & Decorating
- Plastering
- Sheet Metalworking
- Toolmaking
- Vehicle Body Repairs
- Industrial Insulation (to be finalised)
- Wood Manufacturing & Finishing (in development)

\textsuperscript{34} The Gilbert Report, \textit{Making Apprenticeship Work}, NAAC, 2002, commissioned by the National Apprenticeship Advisory Committee.
• **National Apprenticeship Advisory Committee (NAAC) Revision of Curricula**

In 2003, the NAAC initiated a major review of apprenticeship programmes and curricula. The aim was to ensure programmes remained up-to-date, relevant, and met the emerging needs of learners, the workplace and the economy. Curricula for all apprenticeships were revised within the parameters of the NAAC reports, pedagogical design needs, and the National Framework of Qualifications and the QQI requirements. The NAAC initiated the review of apprenticeship curricula for six trades in 2012 namely, Aircraft Mechanics, Heavy Vehicle Mechanics, Electrical, Carpentry and Joinery, Plumbing, and Metal Fabrication.

• **NAAC Assessment Review**

As previously referred to above in section 1b above, in 2008, the NAAC established an Assessment Review Committee (NARC) to review and recommend improvements to the assessment system. The committee was also charged with developing a draft assessment structure for all Phases of apprenticeship programmes. The NARC recommendations were accepted by the NAAC, with the exception of “Pass by Compensation” (see Appendix 1).

6b. **Should the programmes for various trades and occupations have different learning outcomes and durations?**

The agreement regarding the duration of apprenticeship is primarily a matter for employers and employer representatives.

FÁS is recommending more broadly a move from the current “standards + time served” to a “standards based” apprenticeship model with a minimum duration established for each on-the-job phase by trade. The minimum duration for each on-the-job phase is to ensure that the apprentice receives the required level of workplace training and experience during their apprenticeship to enable the development of the requisite body of knowledge, skills, and competencies appropriate to the trade together a final test to determine competence i.e. a competency determination mechanism (CDM).

The placement of each trade on the National Framework of Qualifications on an individual basis may lead to the placement of some trades at different levels on the framework, and this may vary the time required to reach the national standard. In order to enhance the standing of the award and to support the objective of a uniform standard based system for apprentices leading to craftworker status it is proposed to introduce a CDM for all trades which is a final test of competence. This will provide an opportunity for apprentices to demonstrate against the National Approved Standard that they have the range of skills, knowledge, and competencies required to operate as a qualified craftworker.

**More specifically FÁS is recommending:**

1. A move from three off-the-job phases of training to two off-the-job phases of training by the amalgamation of the current Phases 4 and 6 into one off-the-job phase and the duration to be determined by the modules of training delivered for the relevant trade. The reduction to two substantive off-the-job training elements is expected to retain the benefits of the dual system of apprenticeship training, while improving the effectiveness of learning for the apprentice at that stage of the curriculum to enable the effective
development of the required declarative, procedural and dispositional knowledge to attain all of the relevant domain-specific learning outcomes and associated assessment standards, first time.

The benefits of the amalgamation of Phase 4 and 6 ‘off-the-job” training are that it will;

- Provide an opportunity for apprentices to present their workplace portfolios for review. These will be used by the Lecturer to assess their strengths and weaknesses, and provide feedback as they progress through the programme
- Provide an opportunity for apprentices to deepen their understanding of the associated theory and increase the potential of each apprentice to achieve successful learning outcomes first time
- Provide an opportunity for apprentices to undertake course work assignments on an individual basis and demonstrate their analytical, problem solving and innovative skills
- Provide an opportunity for apprentices to develop generic skills such as teamwork and communications, and also build relationships with their lecturers, facilitating intensive engagement with the programme
- Provide an opportunity for apprentices to undertake complete modules of training within the same training environment with consequential benefits in the workplace.

2. The delivery of the proposed model for off-the-job training to be undertaken in the Further Education and Training Sector and/or with appropriate contributions and support from the Higher Education Sector. The internationally accepted view on apprenticeship training is that it takes place within the vocational education and training sector.

3. The introduction of flexible training capacity bands for off-the-job phases of some trades to be examined in the context of lower overall registration. This will provide more flexibility in planning and scheduling of off-the-job training and minimise delays for apprentices in their training, especially with the lower numbers currently commencing apprenticeships in some trades.

4. Each apprenticeship trade is currently being submitted for placement on the National Framework of Qualifications when the current trade curriculum review is completed. This will enable each trade to be placed on the National Framework of Qualifications (NFQ) on its own merits, providing transparency for employers and learners alike about the level on the NFQ of each trade, rather than at present where the trades are a bundle at level 6, with some level 7 outcomes.

5. Options for qualified craftworkers to be reviewed to minimise any barriers to progression and establish appropriate entry points. The new proposed model of apprenticeship to be developed and introduced on a phased basis. The phased introduction of the revised model of training allows testing of the changes to the existing model to be undertaken in a controlled manner, enabling evaluation and corrective action where necessary, that minimise disruption to apprentices and employers.
The revised apprenticeship phasing to be based on:

- Stage 1: developmental phase
- Stage 2: progression phase
- Stage 3: completion phase, including a final test of competence

**Proposed New Model of Apprenticeship**
6c. How should the programme provide for progression beyond apprenticeship?
SOLAS and QQI should develop formal and more widespread progression routes and map the apprenticeship model of the SBA onto higher courses in the National Framework of Qualifications so that the achievement of a National Craft Certificate entitled the qualified craftworker to access a range of relevant courses in 3rd level institutions.

6d. How can learners be best prepared for potential career change in a knowledge-based society?
Employability can be defined as the relative chances of finding and maintaining different kinds of employment. In a knowledge economy greater importance is attached to individual initiative, self-management, social skills and creative abilities in addition to technical skills reflecting an increase in technological complexity and models of organisational efficiency.

The revised SBA curriculum provides the occupational and personal skills required to maintain employability in a knowledge economy. The proposed adjustments outlined heretofore acknowledge that the duration of SBA programmes of between 3 to 4 years and the proportion of time allocated to off-the-job training (some 25%) are in line with many well-developed dual systems of apprenticeship.

6e. What transition measures/programmes, if any, are needed to prepare students to enter an apprenticeship, (a) in the case of early school leavers and (b) in the case of those with a Leaving Certificate or equivalent and (c) those with significant experience beyond school?
See response to question 2c and to question 6b, sections (4-6).

7a. Should the different disciplines/trades lead to awards at different levels of the national framework of qualifications?
See answer 6b above, sections (4-6).

7b. Should interim awards be provided for during training?
Countries with strong apprenticeship systems have been reluctant to introduce modularised qualifications and have limited its scope35 and instead are gradually developing or strengthening double qualifying pathways where apprenticeship can lead to tertiary education entry qualifications36. This pathway to the tertiary sector is also supported by FÁS in its response to question 6c above.

One of the essential component of a well-developed effective apprenticeship system is the award of a qualification and/or licence and/or other recognition that enables an occupation to be practised independently once the apprenticeship is successfully completed37. For example in Austria, companies that train apprentices are obliged to provide apprentices with the complete set of skills and know-how stipulated in the occupational profile; this ensures a uniform minimum standard of training38. Since modularisation is an output-orientated system,

37 Good practice principles in apprenticeship systems: An international study, On-line Journal for Technical and Vocational Education and Training in Asia http://www.tvet-online.asia/issue/1 smith_brennan-kemmis_tvet1
38 Apprenticeship Training in Austria – The Dual System, Organization of the Federal Ministry for Education, the Arts, and Culture (BMUKK). http://www.bmuuk.gv.at/enfr/school/secon/app.xml
this means the link between the formal learning process and the evaluation of the learning outcome is very weak. Consequently, in a context of developing skills (trade) at intermediate level, providing quality and uniform apprenticeships and opening up pathways to third level, FÁS is of the view that the concept of certifying an apprentice to practice as a partly qualified craftworker is not tenable. An apprentice therefore should not be accredited to practise as a qualified craftworker until all prescribed tests and assessments have been completed, whether undertaken in the workplace or in the training centre/college.

While acknowledging that modularization policies may have some merit in recognizing the training of skilled labour, the same policies must be designed carefully in order to ensure that incentives for deeper and broader training still exist as modularization can encourage specialized, partly-trained tradespeople. Notwithstanding this, consideration could be given to acknowledging the achievement of learning outcomes associated with each phase expressed in terms of ‘credits’ towards the full credit requirements of a QQI major award. The rationale for this is to ensure that the national standard for craftworkers is not diluted.

7c. Should time spent on and off the job be more flexible where learners are assessed as meeting the final learning outcomes for the relevant discipline?
There are norms - often referred to as ‘learner effort’ - around the duration of education and training programme required to achieve learning outcomes pertaining to the domain specific knowledge, including technical and transversal skill requirements, of the named occupation and/or the field of learning as expressed in award specification standards.

7d. How should arrangements for accreditation of prior learning be best delivered?
The requirement for mature entrants, especially for Recognition of Prior Learning (RPL) applicants to obtain an employer is a barrier to SBA entry and requires the introduction of supports for the employer in the provision of training opportunities. In addition, SOLAS ought to arrange and coordinate training and assessment of RPL applicants.

7e. How can redundant apprentices be best catered for?
SOLAS will ensure delivery of special temporary supports for redundant apprentices such as the Redundant Apprentice Placement Scheme and placement overseas as circumstances arise. Consideration of incentivising employers to take on additional apprentices - with redundant apprentices a priority - over and above their normal apprentice requirements ought to be given consideration by the appropriate policy makers.

8a. What should be the appropriate balance between work based learning and education/training?
The current ratio of 80:20 (‘on-the-job’:‘off-the-job’) is comparable to many well developed work-based dual-system apprenticeship provision.

8b. How should this be best structured in terms of phases, duration, block or day release, e-learning etc.? 
See reply to Question 6b above and to Section 6 more generally.
8c. Can employers play a greater role in delivery and how should this be done?  
It is the view of FÁS that successful employer engagement requires an investment of time and resources at all levels of apprenticeship management. The contribution of employers in terms of the management and administration of apprentices is very significant and often unrecognised. Indeed, the smooth running of the system depends on substantial voluntary commitment of many employer and staff representatives.

8d. Should web based learning form part of the approach and how would this be integrated into the programme?  
See response to question 6a above.

9.a What providers should deliver the off the job elements in regard to (a) technical and occupational skills (b) transversal skills?  
FÁS is of the view that the Apprenticeship should be led, managed and administered by SOLAS and remain within the Further Education and Training Sector in newly established ETBs, with appropriate contributions and support from the Higher Education (IoT) Sector.

The necessary breadth and depth of expertise to deliver all of the learning outcomes and skill requirements is not available in any one employer or in any one part of the education and training system. The current approaches to the delivery of technical skills and transversal skills should remain in the appropriate phases. The reason is to ensure quality in a context of continuity in the co-ordination, management and administration of the apprenticeship programme, with no disruption to apprentices and employers, including continuity in the delivery of the apprenticeship programme.

More specifically, FÁS is of the view that there is sufficient focus on the attainment of generic/transversal type skills within each of the apprenticeship curricula as per best practice39 i.e. essential generic skills underpin the competency standards for the demonstration of standards required to achieve that National Craft Certificate relating to both the on-the-job and the ‘off-the-job’ phases. The provision of a large variety of experiences and learning strategies as well as new assessment techniques, recommended by QQI and endorsed by the NAAC, ensure the assessment of the theoretical concepts around and application of, transversal skills in the workplace and the transferability of these skills to new contexts.

9b. How should this be structured?  
The current block release system has merit in terms of planning and delivering efficiencies in education/training institutions and in ensuring the apprentice, when released, is available to undertake significant learning to apply back in the workplace. See proposed delivery model diagram at 6b (5) above.

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39 ‘Focussing on generic skills in training packages’, NCVER, Australia, 2002.
10. What is the impact of your proposals on the economy in terms of
(a) meeting Ireland’s current and future skills needs?

FÁS proposals build on the current SBA model which is acknowledged as a key mechanism for providing the middle level intermediate skills (trade) required by the economy. This would be a transition of the 3rd phase of apprenticeship development in Ireland into the next stage (4th) of development.

Just to recap, until the 1990s, when the SBA was introduced, Irish apprenticeship was very similar to that of the UK in its market-based approach and weak regulatory regime. The Labour Services Act 1987 and the Apprenticeship Rules Statutory Instrument 168 Apprenticeship Rules 1997 shifted the Irish system from the decentralized UK model to a design similar to that of continental Europe (dual system). The act rooted apprenticeship in statutory law, delegating the responsibility of occupational training regulation to a national body, FÁS.

The SBA system embodies continental dual system apprenticeship principles, including mandatory educational content, joint regulation of work-based training, full public funding of the institutional costs of part-time education and training conducted away from the workplace. The implementation of this regulation was designed both to regulate training quality in a broad effort to upskill the Irish labour force and to encourage firm participation in apprenticeships. Given the success of the SBA, FÁS cautions against a fundamental / radical change to the model, but rather an incremental reform and upgrading to the existing SBA as outlined in its responses above.

(b) providing a high quality entry route for apprentices to sustainable employment?

A significant presence of systematic ‘on-the job’ training in VET provision such as that provided for in the current SBA model results in a number of positive elements that facilitate the rapid recruitment by enterprises including;

- training carried out at workplaces helps apprentices to acquire practical hard skills and professional experience on equipment, working methods and technologies really used by enterprises (usually the most up-to-date ones) and demanded by enterprises resulting therefore in a better matching of training to labour market real demand

- experience in a real-world environment allows apprentices to develop key soft skills (i.e. problem-solving, conflict management and negotiation, entrepreneurship, teamwork, communication with customers, etc.) in a much more efficient and realistic way than in classrooms or simulated work environments, enhancing therefore the labour market relevance of the apprentice skills

41 Ibid
42 ‘Apprenticeship Supply in the Member States of the European Union Final Report’; European Commission; Directorate-General for Employment, Social Affairs and Inclusion Unit.
Apprentices receive wages while getting trained and this is a highly regarded element within apprenticeship provision.

(c) costs to the State, to employers and apprentices?

See response to Q4a above – Funding.
Area 3. Information on other systems in Ireland including those with a significant work based learning element.

Please provide information below on any programmes which you feel should be considered as part of this review in the format requested below. (The review group already has data on Skillnets and FAS Traineeships so these need not be covered). Complete a separate sheet for each type of programme. Please include programmes such as internships, or programmes of an ad hoc nature which you consider relevant).

The most effective Traineeships appear to be those that are linked to well-structured ALMPs (such as FÁS Traineeships) or are undertaken during training/education programmes. The main success factors are;

a. Their strong links with the labour market
b. A well-structured approach
c. Active engagement of stakeholders, including employers
d. Robust quality assurance mechanisms

Broadly speaking the different types of traineeships are;
1. Traineeships ranging from Work Experience Programmes (WEP) to substantial certified structured training programmes (such as the FÁS Traineeship) as part of active public sector labour market policies (ALMPs) for unemployed people
2. Traineeships in the open private market which, after completion of studies, provide 3rd level graduates with work-related experience before they find stable employment
3. Traineeships that form optional or compulsory part of academic and/or vocational curricula (i.e. traineeships during education/training)

With regard to WEPs, an initiative called the Work Experience Programme was started in Ireland in 1978 and was terminated in 1987. It was aimed at young people 18-20 years of age and lasted for 26 weeks and participants were placed in employment in either the private or the public sector. Within the firm the participant was expected to be given experience of at least four different work tasks. A placement officer from the local National Manpower Service (NMS) office monitored each participant’s progress through regular visits to the workplace and group interviews. The participant was also required to keep a diary of his or her activities while on the WEP and the placement officer was able to inspect this. At the end of the period the trainee received a certificate attesting to the work experience obtained. The programme had to include specific training element in the form of day or block release courses in local colleges, which would account for 20% of the time spent in the WEP. The weekly WEP allowance was fixed at IR£ 34.50 (≈ €43) and although the employer paid it to the trainee, he/she was later reimbursed by the former National Manpower Service. The WEP had the advantage that it entailed no direct costs. No social insurance contributions were payable in respect of the trainee.
Also the Department of Labour at the time reimbursed any additional costs. The intervention had zero impact in the labor market and displacement was prominent\textsuperscript{43}. In general, Traineeships, including FÁS Traineeships, are defined as temporary or time-limited ‘in-company training’ initiatives that include a training/educational component. Since 1995, FÁS has developed over 40 Traineeships aimed at meeting occupation-specific entry-level skill needs across a diverse range of sectors such as Information Technology (IT Support Specialist, Software Developer, Computer and Communications Technician, Business Systems Service Technician, Telecommunications Technical Operator), Business Administration (Legal Administration, Medical Administration), Natural Resources (Forestry Operative), Logistics (Supply Chain Logistics, Freight Forwarding Clerk), Electromechanical (Aircraft Maintenance Technician, Auto-Turning Operator.Setter) and Health and Care (Childcare Worker, Childcare Supervisor, Healthcare Assistant).

**Challenges in expanding the number of occupations covered by Traineeships.**

- Uncertainty around the capacity/willingness/commitment of industry sectors and companies to become involved and sustain their involvement in development/piloting and implementing Traineeships (e.g. identification of training needs, module objectives, development of standards of skill knowledge and competence)
- A particular business cycle may result in many well-qualified and experienced unemployed persons becoming available who do not require additional training to take up employment
- Alternative state-funded initiatives such as Internship programmes may meet the needs of industry through providing motivated and qualified unemployed individuals with the relevant work experience to gain employment
- Clarification from QQI around the stakeholder involvement and requirements in developing new Award standards – this will be a requirement to develop any new Traineeship (or Apprenticeship) programme
- There is a need for some financial support to some trainees, to assist them to undertake the substantial in-company training element of a traineeship
- How to underpin the quality of the on-the-job element of Traineeship to ensure a consistently high level of skill, knowledge and competence; and afford trainees the opportunity to apply the expertise they have acquired during on-the-job phases to a variety of appropriate tasks
- How to develop formal and more widespread progression routes, and map the Traineeship model onto higher courses in the National Framework of Qualifications
- How to address the absence of intermediate level occupations in industry sectors not traditionally associated with SBA apprenticeship, such as IT
- How to develop with all Traineeship stakeholders a dynamic capability identifying areas of change in a developing economy, enabling the system to respond quickly and efficiently to meet its needs and introduce new curricula and certification reflecting this change

\textsuperscript{43} The Work Experience Programme in Ireland, International Labour Review, 1988, No:127, Volume: 4, pp 429-444. The report includes statistically significant estimates of zero impact as well as all other non-statistically significant estimates.
- Developing a single new Traineeship (and even more so Apprenticeship) is resource intensive and can take a number of months to develop and have suitable certification, recruitment, training materials and work placements/trained mentors in situ before commencement date.

**FÁS Specific Skills Training**

In addition to Apprenticeship and Traineeship, FÁS offers a diverse range of certified skill training programmes that provide industry/occupational specific skills as well as preparatory type training to enable a diverse range of unemployed individuals holding qualifications at a range of levels (3-6) on the NFQ, to access job opportunities or progression opportunities to further/higher education/training.

These programmes can vary in duration from 10 weeks to over six months and incorporate, towards the end of the programme, a work experience/in-company module of between 2-4 weeks depending on the duration of the programme i.e. around 20% of the course. This compares with 80% of apprenticeship training in the workplace and around 30% in a typical traineeship. Independent research commissioned by FÁS indicates good placement and progression outcomes from this type of provision.
Area 4. Programmes in other jurisdictions which have a significant work based learning element, and are relevant to future models of apprenticeship/traineeship in Ireland.

Please give details of relevant programmes of which you are aware, if possible quoting relevant reports or website addresses. Please complete a separate sheet for each programme.

The FÁS submission details many approaches adopted internationally with regard to apprenticeship /work-based training systems. It is clear that within this array of different work-based training systems, apprenticeship plays a central role. Based on a specific contract, apprenticeship training gives young people a better preparation to transition to working life, provides continuity of trades and meets the intermediate skills needs (trade) of enterprise and the economy.

The changes recommended by FÁS to the existing apprenticeship system and model will ensure that apprenticeship in Ireland will be better placed to respond to all of the recommendations of the EU Commission\(^\text{44}\) with regard to improving the functioning and performance of apprenticeship, making it more effective, relevant and responsive in raising employability, facilitating labour market transition of apprentices, matching supply and demand, and increasing programme modularisation and flexibility. In addition, the recommended changes will also ensure that the apprenticeship system will be characterised by the quality criteria recommended by UEAPME\(^\text{45}\) for well-functioning and modern apprenticeship systems.

\(^\text{45}\) *Quality of Apprenticeship in the European Union*, UEAPME and European Commission, 2000. UEAPME is the employers’ organisation representing the interests of European trades and crafts and SMEs at EU level. UEAPME is a recognised European Social Partner and incorporates around 80 member organisations from 34 countries representing more than 12 million enterprises, which employ around 55 million people across Europe.
Area 5. Scope for broader integration of other disciplines into an apprenticeship or traineeship model in Ireland.

Please provide examples of programmes or occupations which could be integrated into a more structured form of traineeship/apprenticeship.

Please complete a separate sheet for each programme/occupational area. Where multiple programmes of a similar structure are being described only one sheet is necessary, but please list the names of each programme here.

FÁS welcomes the revival of interest in apprenticeship reflected in the recent European Commission’s Communication ‘Rethinking Education’ (November 2012) and the European Alliance for Apprenticeship whereby, many countries including Ireland, have signed up and expressed their intention to establish/expand apprenticeship systems.

Several European countries\(^{46}\) are looking at adapting their vocational training systems in line with Germany’s dual system e.g. Spain. The objective is not for these countries to adopt the German vocational training system in its entirety as experience shows that Germany’s dual system is suitable as a model but not as a blueprint. Any country wishing to import a foreign system of vocational training must take existing framework conditions into consideration and implement the dual vocational training in line with the country’s own educational, social and economic objectives\(^{47}\).

In that regard, the successful establishment or expansion of a dual VET system is a challenging task requiring, inter alia, a careful analysis of opportunities and constraints of the national/local context (including institutional arrangements and educational, economic and social objectives) in a given country\(^{48}\). FÁS has developed an understanding of the potential opportunities and constraints likely to impact on an expansion of apprenticeship within the Irish context that is informed by its experience of managing the apprenticeship scheme over many years and this understanding is incorporated primarily into its responses to Section 3 of this consultation document.

While in theory, there is no limit to the range of apprenticeships or traineeships that might be undertaken, from experience the commitment and capacity of industry to undertake and invest the required time and resources in an intermediate skills development model, is a limiting factor.

According to the UK Skills Funding Council\(^ {49}\), employers view apprenticeships as a long-term investment in developing their workforce of the future and on that basis tend to get involved in apprenticeships for three main reasons:

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\(^{46}\) India, China, Russia and Vietnam have arranged to cooperate with the German government.

\(^{47}\) *Vocational education and training in European countries*, Literature Database for Vocational Education and Training (LDBB) of the Federal Institute for Vocational Education and Training (BIBB), Germany, July 2013.

\(^{48}\) Apprenticeship: Governance modes and financing approaches, CEEDPOP 2013.

to develop the workforce of the future – Apprenticeships are the most effective route to providing skilled workers;

to ‘grow their own’, training recruits in their way of doing things; and

to support their recruitment activity – mostly as an alternative way of getting hold of fully skilled workers (who are rare), or of attracting better-quality candidates

Expanding the Apprenticeship programme (either through creating additional Apprenticeship places in the same areas or through new apprentice occupations) is seen as a very risky undertaking among UK colleges and training providers. This is partly because there is no clarity over long-term funding – the general assumption is that budgets are unlikely to expand. Training providers need clear guidance on:

- what type of (and how many) Apprenticeships should be prioritised;
- what the timeframe should be
- how the expansion is to be funded

The UK Skills Commission\(^5^0\) believes that in a deepening recession, additional measures need to be considered to facilitate expansion of apprenticeship such as incentives for employers to recruit additional apprentices and larger employers to ‘over train’ apprentices; employer rewards for the achievement of full apprenticeship frameworks; and, in some circumstances, wage subsidies to recognise the additional costs incurred by employers, particularly SMEs. The Commission also urges the UK Government to clearly set out its plans for the expansion of apprenticeship provision in the public sector, indicating how many places it intends to create and in which sectors, and whether or not these places will be for new recruits or current employees converted onto apprenticeships.

All of the measures mentioned above have been addressed by FÁS primarily in its responses to Section 3 of this consultation document.

\(^{50}\) *Progression through apprenticeships; The final report of the Skills Commission’s Inquiry into apprenticeships*, March 2009.
Area 6. Please make any other points you consider relevant to the review

FÁS proposes a number of changes to the SBA model as outlined in section 2 of this consultation document to enhance the benefits it provides to apprentices, employers and the State. For apprentices, the establishment of trade specific educational entry requirements will accurately reflect the demands a course will make on them, ensuring greater mutual compatibility and reducing drop-out rates. A review of entry requirements for mature entrants will help ensure those without formal qualifications access training to a craft standard.

The amalgamation of the Phase 4 and 6 ‘off-the-job’ modules will allow apprentices to complete full modules in a single training environment, providing greater continuity of focus, while the introduction of Workplace Portfolios for on-the-job training will provide them with a record of achievement, and instructors/lecturers with an important diagnostic tool.

The current review of apprenticeship curricula, with the inclusion of relevant new technologies will provide apprentices with the skill sets to meet the needs of employers in the evolving economy, and the placement of each trade on the National Framework of Qualifications will provide transparency for all stakeholders.

The introduction of annual forecasting of employer demand for apprentices within the annual budget framework will include a moderating mechanism - a key recommendation from Forfás. These changes will enable improvements to be made in the capacity planning and may lead to the possibility for the provision of public sector training opportunities, resources permitting, and this will benefit not alone apprentices but the long term needs of the wider economy.

For employers a reduction in ‘off-the-job’ training phases will minimise disruption and give potential for more flexible training periods, the establishment of a unified register of approved employers able to recruit and train specified numbers of apprentices will be of assistance to employers and apprentices, and the State in the recruitment process.

Finally, the introduction of a Competency Determination Mechanism will further ensure that apprentices can meet the required National Standard and complete their apprenticeship.

For the State, the SBA programme will be led, managed and administered by SOLAS will ensure continuity and avoid disruption for apprentices and employers. It will deliver efficiencies in the planning, scheduling, delivery and administration of ‘on and off-the-job’ training.

Many governments, including Ireland’s, regard apprenticeship as an effective way to meet existing and future intermediate skill needs. However, the shift to more service-based activity at the lower and upper occupational levels in many economies combined with the
effects of the global recession and associated fiscal crisis, present challenges for the traditional role of apprenticeship.

With regard to a shift to more service based jobs, the case of Germany is instructive. Currently, there are 340+ apprenticeship occupations in Germany spanning all sectors of the economy. The logic of the German training system developed around the demands of manufacturing and traditional high skill services sectors (banking, insurance). Both are normally the reference points for the German apprenticeship model. The new lower skilled services sectors (hotels, beauty care, cleaning, restaurants), and the higher skilled sector (IT), have expanded greatly in Germany in the last decade where training requirements are quite different in these respective sectors.

Low cost is the primary competitive advantage employed in the lower skilled sector, with a minimum training requirement, whereas higher level technical, analytical and relationship management skills are at a premium in the high-end services sectors (as well as much higher rates of pay). The regulated vocational training share in the lower-skilled services sector is relatively small with the emphasis on general skills. Established patterns of German VET and qualification systems are becoming less relevant to both the higher and the lower service sectors and so the classical regime of dual apprenticeship is tending to become less representative of the German labour market as a whole.

The training market in Germany is responding to this shift. The number of apprenticeship places offered by companies increased markedly in 2011 to circa 600,000 (+30,800 on 2010) helped by the relatively stable economic situation in Germany\(^{51}\). The offer of places by employers in 2011 across all sectors was high. However, the demand for traditional engineering/manufacturing and financial services apprenticeships exceeded available offers. On the other hand, in the lower level service sector, offers of apprenticeships by employers exceeded demand from prospective apprentices\(^{52}\).

At the same time, employer proposals for reducing the costs of apprenticeship by increasing flexibility have been accepted\(^{53}\). In addition, some occupations have been amalgamated\(^{54}\), the curricula of other apprenticeships updated\(^{55}\), and alternatives to academic progression routes for VET qualified workers developed\(^{56}\).

\(^{51}\) Training Market Statistics of the Federal Employment Agency, Federal Institute for Vocational Education and Training, Survey of 09/30. The training market was more favourable in 2011 as the gross domestic product rose in the first quarter of 2011 by 4.7% and in the second quarter by 2.7% over the corresponding quarters of the previous year.

\(^{52}\) For example, in the fast-food sector.


\(^{54}\) For example, training leading to a qualification in the three occupations of ‘office management clerk’, ‘commercial clerk for office communication’ and ‘specialist in office communication’ has been replaced by a new single standardised three-year training occupation for ‘office management clerk’. [http://www.bibb.de/en/60894.htm](http://www.bibb.de/en/60894.htm)

\(^{55}\) For example, a new apprenticeship occupation of ‘specialist in labour market services’ incorporates the latest reforms to statutory unemployment insurance, and a much stronger emphasis on customer orientation. Those who qualify as ‘labour market services specialists’ in future will advise and support people needing help in choosing a career, finding work, dealing with welfare benefit and childcare decisions, drug or debt problems, and claiming family benefits. Places will be offered by the public and private sector employers. [http://www.bibb.de/en/61371.htm](http://www.bibb.de/en/61371.htm)

\(^{56}\) For example, a new advanced training qualification of ‘certified senior clerk for healthcare and social services’ is designed to bring together the numerous training opportunities at supervisory/middle management level which previously existed at Chamber level and is open to all those who have completed vocational education and training in recognised training occupations and is offered as an attractive alternative to a Batchelors degree. [http://www.bibb.de/en/60053.htm](http://www.bibb.de/en/60053.htm)
One of the key lessons from the German experience is that the low skill/low wage services sector does not appear amenable to the longer-duration apprenticeship type training (3 years) as it rarely deals with durable products that require longer-duration job experience or services requiring high levels of tacit knowledge. In many cases, lower level service jobs can be undertaken independently of equipment. Shorter-duration alternating-type training, such as FÁS traineeships, is likely to prove more effective in such instances.

In Britain, the government practice of target-setting for apprentices in terms of numbers has led to side-lining employers in favour of ‘training providers’ to whom most government funding is channelled on condition that they enable the government to meet its targets. Training providers then place ‘young people’ with employers with little regard to local skill needs. The prime advantage of apprenticeship as a means of signalling skill need and satisfying demand for those skills is thereby dissipated.

The quality standards of UK apprenticeships vary widely. In recent years, UK frameworks were introduced for ‘lower’ levels of the services sector (retail) and for ‘advanced’ apprenticeships in the higher level skills sectors such as engineering and ICT. An engineering apprentice might study for an HND and follow this four-year course with a sponsored degree. At the other end of the spectrum, an ‘apprentice’ might spend a few months working in a corner shop being assessed for an NVQ Level 2 in the workplace. Concerns are now beginning to emerge with regard to some apprenticeships aimed at the lower services sector being overly long, (such as retail), and that they may contribute to displacement, deadweight and lock-in effects\(^57\).

In addition, serious concerns have also emerged around the integrity of some aspects of apprenticeship frameworks, in particular where they have not been subject to scrutiny by Ofsted - the qualifications watchdog\(^58\). Moreover, apprenticeship remains a further education qualification that is still not currently recognised by the UK universities admissions service, UCAS\(^59\) (a similar situation currently exists in Ireland).

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\(^57\) ‘Lock-in effect’ refers to reduced search intensity of training programme participants or fewer job offers by caseworkers while participating on the programme. Deadweight refers to re recruitment of trainees on an active labour market programme which would have naturally occurred in the absence of the programme. Displacement refers to any changes in employment elsewhere in the economy in addition to the direct job creation effect, as a consequence of the active labour market programmes. Displacement is sometimes also known as ‘crowding out’ of jobs.

\(^58\) Panorama, BBC 1, Monday 2\(^{nd}\) April 2012, 8.30pm.

\(^59\) There are moves to enable those on advanced apprenticeships (NVQ 3 - equivalent to ‘A’ levels) to access foundation degree programmes and from there to progress to mainline degree courses.
In summary, FÁS is of the view that SBA is an effective model of apprenticeship training and can become even more so if the improvements recommended throughout this document are implemented.

Finally, FÁS would like to thank the Department of Education and Skills for the opportunity to formally submit its recommendations to the Apprenticeship Review group.
Appendix 1

National Assessment Review Committee Recommendations

The NARC recommended the adoption of the following Strategic Objectives for the Assessment System:

1. Development and coordination of a range of assessment instruments capable of measuring student performance against National Outcome Standards
2. Providing quantitatively reliable measurements for assessing an apprentices’ achievement of learning outcomes
3. Assessing accurately gradations in unsatisfactory, average, good and excellent performances
4. Testing effectively higher outcomes as phases progress
5. Employing both formative and summative assessment methods
6. Ensuring fairness, practicability, reliability and validity are central features
7. Involving stakeholders in its design, operation and monitoring
8. Updating regularly to reflect modern practice
9. Reviewing regularly to ensure that the quality and efficiency of the Assessment System are optimal

- The NARC also recommended adoption of the following set of Programme Outcomes.

On completion of the Programme apprentices will be able to:

1. Display the designated level and range of knowledge of the structure and ethos of their chosen crafts
2. Display the designated level and range of knowledge of the mathematics, sciences and technologies underpinning their particular crafts
3. Demonstrate a comprehensive range of specialised skills, and competencies in the use of related tools
4. Apply their knowledge, skills and competencies in familiar and unfamiliar contexts
5. Diagnose and resolve problems encountered in the course of their work
6. Take responsibility for planning their work ensuring that it adheres to the quality standards of their crafts
7. Communicate and interact effectively as members of teams, and exercise appropriate leadership within the workplace environment
8. Exercise their crafts safely and effectively, observing technical and environmental standards and regulations
9. Understand and exercise their ethical responsibilities towards people and the environment
10. Take responsibility for their own continuing learning
The NARC further recommended that all Module Learning Outcomes be mapped against Programme Outcomes to ensure that the latter are adequately covered by the former:

1. Every module should have an associated map indicating how the assessment techniques contribute to the overall assessment of the various module learning outcomes
2. Practical tests should include more reference to related theory and generic skills
3. Theory tests should involve multiple-choice questions, short answer questions and essay-type questions
4. All FÁS Apprenticeship Programmes should employ coursework assignments to extend the range of off-the-job assessment techniques
5. Coursework assignments should embrace a range of assessment methods, such as case studies, learner records, portfolios, projects and peer-assessment or self-assessment where appropriate
6. Coursework assignments should be group-based in Phase 2, and individual-based, with additional group-based projects where appropriate, in Phases 4/6
7. Workplace portfolios should be introduced in Phases 3, 5 and 7 to reinforce the existing assessments by Workplace Assessors

The NARC recommended the adoption of the following objectives for Workplace Portfolios:

1. Giving apprentices opportunities to assemble records of accomplishment and evidence of achievements which would be of benefit to their career development
2. Helping apprentices master generic skills such as communications, learning to learn, and engagement
3. Providing apprentices with opportunities to assess and reflect upon their progress through the programme. What has been learned? What needs to be learned?
4. Helping apprentices gain clearer understandings of their individual contributions to their particular employers’ objectives
5. Assisting apprentices to understand better the interactions between knowledge and skills gained off-the-job and their on-the-job experiences
6. Acting as a diagnostic tool allowing instructors/lecturers to assess strengths and weaknesses of individual apprentices as they proceed from an on-the-job phase to the succeeding off-the-job phase
7. Providing complementary confirmation for the apprentice and employer of the competences achieved during on-the-job phases
8. Providing a structured methodology for apprentices and employers to jointly review skills acquired to date
9. Providing apprentices with feedback on their progress in the mastery of the skills of the craft
10. Requiring each apprentice to submit a short essay in Phase 1, and assemble Workplace Portfolios in Phases 3, 5 and 7
11. Requiring instructors/lecturers to assess Phase 1 essays and Phase 3, 5 and 7 Workplace Portfolios
12. Adopting a more formal approach to Formative Assessment in the Apprenticeship Programme
13. Introducing more discrete generic skills modules on communications and teamworking to the Apprenticeship Programme, and ensuring that the content of both be covered, in the main, by the overall curriculum
14. Reviewing and restating learning outcomes of all elements of the Apprenticeship Programme in order to ensure that communications and teamworking outcomes are being adequately addressed
15. Ensuring the number of summative assessments per phase should not normally exceed 6, and that explanations be sought when a trade departs from this guideline
16. Establishing a management information system at an early stage capable of providing comprehensive comparative data on apprentice performance across trades and centres
17. Conducting a statistical analysis of an apprentice’s performance across trades and centres annually, taking corrective action when substantial variations from the norm arise
18. Commencing phases 2, 4 and 6 with locally designed diagnostic assessments aimed at determining, on a formative basis, the strengths and weaknesses of the particular cohort of apprentices
19. Convening meetings of subject matter experts annually with instructors and lecturers to discuss standards
20. Establishing a representative group to review and advise on the development, processing and distribution of assessments
21. Consider the establishment of an external monitoring system, involving both FÁS and Institutes of Technology, for Phases 2, 4 and 6
22. Putting in place formal arrangements to facilitate the exchange of views on assessment and related matters between instructors and Lecturers.

- **Marking and Grading Performance**

The NARC also recommended that:

1. Assessments should include a balance of skills demonstration, coursework, and theory; sufficient to test if programme outcomes have been met
2. Assessment items should be awarded marks which reflect their relative difficulty;
3. Partial marks should be awarded for partial answers
4. Practical tests and drawing tests should continue to use an essential/desirable format where appropriate
5. Total marks allocated to tests should be in multiples of 100
7. A pass by compensation scheme should be introduced consolidating skills and competencies acquired by the apprentice
8. Every apprentice should receive a comprehensive manual at induction to the Programme

- The NARC recommended that:
  1. In the published curriculum documentation and/or in standard learner resource material, typical test items and sample responses should be provided at the end of each unit and module of learning to assist learner preparation
  2. Following every referred summative assessment, feedback should be provided to apprentices identifying learning outcomes which require further attention (see Chapter 9)
  3. Mock tests should be introduced to help apprentices become familiar with assessment techniques
  4. Apprentices should not have to wait longer than 12 weeks before being offered resit examinations
  5. An apprentice’s engagement with the programme should be determined from considerations of (1) Participation, (2) Involvement, (3) Commitment and (4) Application

- The NARC recommended that apprentices who are engaged with the Programme:
  1. Should be allowed to proceed to second, and, if required, to third and final resits
  2. If the final resit is failed, the apprentice should be required to repeat the relevant phase in its entirety, and pay for the related tuition and assessment
  3. If apprentices who are not engaged with the programme fail a first resit, they should be required to re-attend the relevant modules, pay the appropriate fee, and be re-examined on completion of the modules
  4. Apprentices who fail to attend scheduled resits should be required to re-attend the relevant modules, pay the appropriate fees, and be re-examined on completion of the modules
  5. Merits and distinctions in individual assessment events should only be available at first attempt.
Appendix 2

Examples of Traineeships developed by FÁS since 1995

Motor Parts Servicing Traineeship
Legal Administration Traineeship
Medical Administration Traineeship
Business Administration Traineeship
Private Security Services Traineeship
Legal Studies Traineeship
Early Childhood Care and Education Supervision Traineeship
Office Administrator Traineeship
Software Developer Traineeship
Forestry Operative Traineeship
Freight Forwarding Clerk Traineeship
Sales and Marketing Assistant Traineeship
Legal Secretary Traineeship
Supply Chain Logistics Administrator Traineeship
Aircraft Maintenance Technician Traineeship
Leisure Facility Instructor Traineeship
Jewellery Manufacturing Operative Traineeship
Computer and Communications Technician Traineeship
Childcare Practitioner Traineeship
Beauty Therapist Traineeship
Pharmacy Sales Assistant Traineeship
Insurance Broking Official Traineeship
Care Assistant (Care for the Elderly) Traineeship
Financial Adviser’s Assistant Traineeship
Auto - Turning Operator/Setter Traineeship
Equestrian International Instructor Level 1 (BHSAI) Traineeship
Security Equipment Installer Traineeship
Business Systems Service Technician Traineeship
Outdoor Activity Instructor Traineeship
Thatcher Traineeship
Telecommunications Technical Operator Traineeship
Trainee Jockey Traineeship
Racing Groom Traineeship
Private Security Personnel Traineeship
IT Support Specialist - Traineeship
Healthcare Assistant Traineeship
Sales Service Fitter Traineeship
Medical Secretary - Traineeship
Landscaping Skills Traineeship
Retail Skills Health and Beauty Traineeship
Overhead Line Worker Traineeship
Health Care Support Traineeship
Early Childhood Care and Support Traineeship