

Apprenticeship Action Plan 2021-2025 Submission

THE UNION FOR
CRAFT AND SKILLED
TECHNICAL,
ENGINEERING,
ELECTRICAL AND
CONSTRUCTION
WORKERS IN
IRELAND





SUBMISSION

Apprenticeship Action Plan 2021 – 2025

Background

Connect Trade Union is predominantly a craft-based trade union that came into existence in 1920, as part of the emergence of an independent Irish State. Our roots can be traced back to the craft guilds, which fostered the original apprenticeships. The union has taken a leading role in apprenticeships at an EU level and has represented the ETUC on working parties, dealing with employer bodies such as BusinessEurope SMEunited and CEEP. Connect Trade Union is currently affiliated to the European Alliance for Apprentices (EAfA) and co-hosted their European conference in Dublin in April 2018. We take the view that there is a danger in the Irish system reinventing the wheel if it ignores or under emphasises the ample amount of research undertaken at European level by bodies such as CEDEFOP and the EAfA.

The review of apprenticeship undertaken in the middle of the last decade was prompted at least in part by evidence from the HEA that the IOTs were ceasing to provide courses at level six and seven, choosing to concentrate on level eight degrees. The report continues: 'These changes have occurred without evidence from the labour market that skills at these levels (six and seven) are no longer required.'

At the time of the Troika, the OECD carried out a review of VET in Ireland. It's conclusion in respect of apprenticeship listed the strengths of the Irish system as:

- 'Collaboration with the social partners is well established and takes place at most relevant levels;'
- 'The apprenticeship system is well structured with a systematic blend of on and off the job elements.'

Among the challenges set out are:

- 'Apprenticeships are limited to a narrow set of occupations. Workplace training is insufficiently used in many programmes;'

It is logical therefore, to build on the strengths identified in this review and to continue to address the weaknesses. Arguably the biggest weakness in Irish technical training is the high level of dropout in IOTs. According to 2017 figures at least one-in-four new entrants at the IOTs in Blanchardstown (29%), Limerick (27%), Galway-Mayo, Letterkenny and Sligo (all 25%), dropped out during or at the end of first year. The reasons for this high drop out rate are multi faceted but may be linked to a disconnect between the theory taught in classroom and its practical application.

Drop out may also be linked to a high level of student participation in minimum wage shop and pub jobs. The earn while you learn model counteracts these two factors inhibiting completion.

Connect Union represents craftworkers and apprentices in 21 of the existing 25 trades, which includes 15,358 of the 15,901 existing registered apprentices currently in training. The union and its members play an important role in the delivery and the governance of the apprenticeship system.

Electrical	Engineering
1 Aircraft Mechanics	11. Farriery
2 Electrical	12. Industrial Insulation
3 Electrical Instrumentation	13. Toolmaking
4 Electronic Security Systems	14. Metal Fabrication
5 Instrumentation	15. Pipefitting
6 Refrigeration and Air Conditioning	16. Sheet Metalworking
	17. Mechanical Automation and Maintenance Fitting (MAMF)
Construction	Motor
7 Carpentry and Joinery	18. Agricultural Mechanics
8 Painting and Decorating	19. Heavy Vehicle Mechanics
9 Plumbing	20. Motor Mechanics
10 Construction Plant Fitting	21. Vehicle Body Repairs

The existing apprenticeship rules provide for training through 7 modules over a minimum of 4 years (208 weeks) this time allocated as follows:

On the job training 166 weeks - 80%	Phase 2 - ETB 20 Weeks – 9.5%	Phases 4 & 6 – IOT 22 Weeks – 10.5%
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Eighty per cent of apprentices’ time is spent in the workplace, where they undertake a range of tasks under the supervision and guidance of craft workers.

Apprenticeship learning is determined by the Social Partners through Employer bodies working in concert with the appropriate Union. Unions and employers are best placed to know the evolving needs of industry and of the labour market and are in a position to impart this information to providers. The failure of this relationship was highlighted in the HEA report already alluded to.

Union members train Apprentices on the job. This is achieved through established experiential training techniques during phases 1, 3 5, and 7 over a minimum period of 3 years and 10 weeks of an apprentice’s training. Foundation Skills Training is conducted in the ETB’s for 20 weeks and academic learning takes place in the IOTs for the remaining 22 weeks. The training content is periodically reviewed at national level under the aegis of Solas by the use of Subject Matter Experts from employers, unions, ETB’s and IOT’s.

Apprenticeship leads to an QQI Level 6 Advanced Certificate, which is internationally renowned and leads to Irish Craft qualifications having a high level of international acceptability.

In consideration of any possible restructure, it is important to take into account the current structures and the value each one brings. It is our experience that the benefits of the National Apprenticeship Advisory Committee (which is provided for in statute) far out-weighs any other structure. Any reform of the current structures should be done so to enhance the NAAC and therefore enhancing the Statutory Apprenticeship Program.

National Apprenticeship Advisory Committee	Full Stakeholder participation	Apprenticeship Council	Full Stakeholder participation
Family of Trades	YES	Consortia	NO
Curriculum Development	YES		
Standards Development Group	YES		
Project Steering Group	YES		
Recognition for Prior Learning	YES		
Apprenticeship Appeals	YES		

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The core features of what constitutes an apprenticeship in Ireland are set out in Figure 1 of page 8. What, if any, changes should be made to these features? Employers must register each apprentice with Solas within two weeks of commencement of employment

All new apprenticeship programmes must be developed by industry-led consortia. While the architecture of each consortium may vary, a basic requirement should be the presence of representative employer bodies and trade unions.

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The legislation relevant to apprenticeship in Ireland is set out in Figure 2 on page 10. What, if any, changes should be made to the provisions relevant to apprenticeship?

It is unclear whether legislative change would bring any concrete improvement to the operation of apprenticeship, and whether the improvement – if any – would be worth the legislative effort. If we take the experience of the 1998 qualifications act which set out to establish a single qualification body and ended up establishing three, the precedent is not encouraging. In addition, the time spent in preparing and enacting legislation would be sterile from the point of view of policy development. While there may be a basis for a single piece of legislation encompassing existing legislation, it is crucial that the fundamental principles set out in the Industrial Training Act, 1967 (as amended) are maintained e.g. designation of apprenticeships, making of statutory rules on a range of matters, contract of apprenticeship, approval and monitoring of employers

3 What are your views on the operation of the current governance and management structures for apprenticeship described in Figure 3 and on page 11?

Existing pre 2016 apprenticeships have maintained their successful position in the labour market and provide a range of transferable skills together with a platform for progression. There is a concern over some consortia-led apprenticeships' focus on a narrow range of skills which will limit the employability of apprentice graduates. An emphasis must be maintained on "transferable skills" element of the apprenticeship system. Should the particular industry needs change this could lead to future issues where one qualification attained through a specific apprenticeship is relying on the Recognition for Prior Learning process to have a minimal value in attaining another apprenticeship qualification.

4 How has the Apprenticeship Council functioned as a structure and what, if any, changes should be made to its operation or terms of reference?

The Council is working well but only in the context of post 2016 apprenticeships that accounts for 913 apprentices out of a total population of 17,965. The terms of reference ought to be amended to mandate appropriate social partnership participation for post 2016 apprenticeships. The National Apprenticeship Advisory Committee should be rebranded as a National Apprentice Alliance to bring it into line with European Policy thinking in this area. The structure should be easily understandable to European policy actors. This would make it easier to attract EU support as it will mirror the EU model of apprenticeship as set out in the Commission Document.

5 Reflecting the partnership between multiple stakeholders in delivering apprenticeship, what governance and management structures are appropriate for a single governance model?

The experience in Europe points to the necessity for an oversight body for the entire apprenticeship population. This is referred to in the EU as an Apprenticeship Alliance. Such an alliance could be an amalgamation of the stakeholders involved in the current Apprenticeship Council, with support from Solas and the NAAC, with oversight of recruitment, governance, quality assurance and certification for all apprentices.





6 **How should the current roles of the Apprenticeship Council, SOLAS and the HEA be performed under this model?**

The Apprenticeship Council and the NAAC should be combined under the aegis of SOLAS to act as the Governance body for apprenticeships. It should be structured in accordance with the EU commission's document on apprenticeship. The HEA would continue to regulate the IOTs or TUs as institutions.

7 **What role can be played by sectoral or regional structures and bodies in the governance and management of apprenticeship?**

Given the size of Ireland it is difficult to see a realistic role for regional bodies. However as is already the case the lead centres for individual apprenticeships be they ETB centres or IOTs will be dispersed throughout the country. Authorised Officers (formerly Services to Industry Advisors) have been dispersed throughout the various ETB's. In a revised structure they ought to be organised centrally with specific responsibility for apprenticeship matters only. They should focus exclusively on duties associated with governance, and quality assurance. Other ETB recently acquired duties are a distraction from this task.

8 **What are your views on the opportunities for structured and transparent dialogue in the development and implementation of apprenticeship? Are there any ways in which engagement between stakeholders can be further enhanced?**

Again, the concept of an Apprenticeship Alliance embracing stakeholder representation for all apprenticeships would enhance the process. The role of learner representatives and representatives of trainers/teachers and workplace trainers/mentors must be emphasised.

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9 9. What are your views on the operation of the 10-Step process to develop new apprenticeships described in Figure 5 on page 15? What works well and what, if any, changes do you think should be made to the process?

While the process does not suggest that the inclusion of the trade union (Worker/Learner Representative) is in the latter stages only, this has been a feature of many of the new consortia-led apprenticeships. In fact, on too many occasions the inclusion of the trade union has had to be fought for. This does not reflect the process which has brought about world class apprenticeships in the form of Pre-2016 Apprenticeships. Stakeholder participation (in the form of the trade union involvement) is a must if the potential apprentice is to identify with any apprenticeship that is being sold to them as a real opportunity for them and not just the industry that seeks an apprenticeship programme.

10 A number of initiatives have been taken to streamline the processes associated with apprenticeship e.g. online registration of employers and apprentices. What has been the impact of these changes for stakeholders? Can other improvements be made?

Online together with face to face inductions outlining the obligations of the employer and apprentice should become a feature of registration. Far too often employers disregard the code of conduct with respect to apprenticeships and then plead ignorance. The recruitment/ induction emphasises the vital nature of early contact between the apprentice and the workplace in order that the young people become acquainted with the realities and discipline of working life. The first year off the job as introduced by ANCO back in the day was highly unpopular with employers for good reason.

11 How do the processes for the development / review of craft and consortia-led apprenticeship curricula and learner assessment align with education provider and institutional practice?

The current practice of development/review of craft apprenticeships is another success in that all stakeholders are involved. It is important to note that no single party to this process could carry out the development/review process on their own and continue to deliver such a high standard of curriculum content. The education providers must deliver a curriculum that remains fit for industry and the learner and that is why the current system of bringing the education providers, employers and the trade union (as worker/learner representative) together is system which delivers world class apprenticeships. The consortia-led apprenticeships are only at or finished design stage and therefore development/review is yet to feature. From the start they have lacked stakeholder participation with some of them actively excluding the input of the worker/learner representative despite the obligation to include them. Learner assessment should be independent of the institutions where the curriculum is delivered.

12 How can apprenticeship provision be integrated into the quality assurance, administrative and academic leadership arrangements for Further and Higher Education Institutions?

The well publicised difficulties in finance and governance of some IOTs lead one to doubt whether QQI procedures are adopted in spirit as opposed to a tick box exercise in all of the IOTs. We therefore strongly advocate that a purpose-built Quality Assurance Framework should be designed and administered and by SOLAS with delivery devolved to ETBs and IOTs under SOLAS supervision.

13 What, if any, changes to the structure or delivery of the craft and consortia-led programmes do you consider necessary?

Quality assurance must feature in all areas of apprenticeship. Educational providers must deliver the curriculum consistently across all facilities and must provide access to the highest standard of training equipment no matter where they are.

Quality assurance must be measured within the employment to ensure apprenticeship is delivered properly and that the apprentice is given access to all areas of the curriculum which feature on the job.

Effective sanctions must be seen to be applied against those who consistently fail to deliver the apprenticeship in accordance with the quality assurance framework and the obligations outlined within the apprenticeship rules.

A national register of authorised officers which would encompass the entire country and apprenticeship system should be compiled.

In order for an employer to register with SOLAS for the purposes of apprenticeship they must have an appointed and competent person referred to as the "Qualified Assessor" in the chosen field. This person should hold not only the minimum qualifications in the chosen field but should also be trained & accredited as an authorised person (by SOLAS) for the purpose of ensuring on the job subject matter is delivered in accordance with the curriculum. There should also be requirement to ensure the qualified workplace assessor is available in the workplace at all times, with a replacement being appointed in the event of a vacancy arising for any reason.

14 How should apprenticeship be funded?

- Administration of system should be funded from the National Exchequer
- On the Job Phases (1,3,5 & 7) of existing craft apprenticeships should be funded by employers
- Off the Job Phases (2,4 & 6) of existing craft apprenticeships should be funded from the National Training Fund

Post 2016 apprenticeships would be similarly funded. NTF money should be used to increase the level of support for post-2016 apprenticeships to that prevailing for pre-2016 apprenticeships. It makes no sense to deny funding to a model with a proven completion track record, while continuing to fund programmes which have drop out rates in excess of 50% between first and second year.

15 What, if any, role should financial incentives play in encouraging participation in apprenticeship?

At present it is unclear how successful the current bursary system is in encouraging participation: Incentives to employ female apprentices have not yet addressed the gender gap within apprenticeships but perhaps this could be measured before consideration is given to greater promotion of the payment. (It should be noted that the bursary alone is not expected to overcome the issue of female participation particularly in craft apprenticeships)

The new bursary has not been in existence long enough to measure its success but this should be done in the context of not just encouraging participation in apprenticeship at entry level but at all levels to ensure a successful pathway to qualification.

16 What, if any, changes are required to the funding allocation mechanisms for apprenticeship?

The Apprentice Student Charge should be abolished. It is an obstacle for low wage apprentices to progress through apprenticeships and does not appear to be a consistent charge i.e. it is not a feature whilst attending an ETB and then varies according to each IoT.

We reiterate that there is an unanswerable case for funding post 2016 apprenticeships on the same basis as pre 2016 apprenticeships, using the NTF which is, after all funded from employer contributions.

17 How should the impact and cost effectiveness of apprenticeship be evaluated?

This must be measured from short to long term in respect of the following:

Firstly, apprenticeship completions should be compared at an IoT level to completion rates in the IoT as a whole.

- The numbers that enter the apprenticeship system
- The numbers that the go on to qualify in the respective apprenticeship
- The number that drop out of apprenticeship
- The points of each apprenticeship where most failures occur
- The numbers that go on to further education and those who use the Apprenticeship qualification to seek exemptions for additional education or to secure membership of a professional body.

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18 Which cost elements of apprenticeship impact most on employers?

It is our experience that any cost for an employer is relative to an employment relationship and not directly attributed to the fact that the employee is an apprentice.

Apprenticeship is an investment in the skills development of an employer's workforce and not a cost.

In fact, the labour costs related to apprenticeship are lower than any other employment relationship. Whilst no longer an indentured system, the payment for existing Craft Apprentices at entry level is below the national minimum wage.

As these apprentices must work under a "competent person" who must be qualified in the respective craft, all equipment/facilities will be in place already.

19 How can the cost/benefit balance of participation in apprenticeship be improved for employers?

There is no cost above that of an employment relationship. Just as an apprentice should value apprenticeship training, so too should the employer. In addition, the bargain for employers is that after the first year the apprentice carries out increasing elements of craft workers tasks, while being charged out at the apprentice rate.

20 How can small enterprises be supported to participate in apprenticeship?

The current bursary system is the most practical way to support these enterprises. It should be linked more closely with registration.

An apprenticeship is founded on a contract between an employer and an apprentice. There have been some vague discussions about a group of employers sponsoring an individual. This brings problems for both sides. For apprentices uncertainty as to their status and quality training, for the employer the uncertainty that action by another employer could leave them liable for action at the WRC.

21 What steps can be taken in relation to the structure or delivery of apprenticeships to reduce costs for small enterprises, for example, assistance with recruitment or administrative task or in company training?

On the Job support from the Authorised Officers would be helpful. See answer to question 20

22 How well are the benefits of, and opportunities to apply for, an apprenticeship currently promoted to young people and adults?

- a) Benefits – The opportunity to earn as you learn is being well promoted.
 - b) Opportunities – Current opportunities seem to be meeting market needs.
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23 Are there any steps that could be taken in relation to programme design, delivery and progression pathways or other key features to improve the attractiveness of apprenticeship to young people and adults?

A visual roadmap of progression paths ought to be developed, in association with bodies such as RIAI and Engineers Ireland. This would be aimed at secondary school students, ideally in transition year.

A more intensive programme of engagement with guidance counsellors should be undertaken.

Apprentices should be entitled to the full range of student facilities in the IOT they attend as the fee they pay is equal to student contribution fee when averaged weekly

The earn while you learn message should be more widely promoted and the research (conducted in DKIT) on the adverse effect of part time student work on grades and completion should be more widely promoted.

24 What, are your views on the provision of specific financial and non-financial incentives to increase participation by under-represented groups?

Throughout the EU bursaries are used as a policy tool to support marginalised groups to assist them in attaining the required or equivalent standards that lead to alternative pathways to Apprenticeship and best practice in this regard ought to be applied in Ireland.

Apprentices with child dependants for any period of apprenticeship where the rate of pay is less than the National Minimum Wage should be entitled to a dependant's allowance from SUSI.

25 How can the range of further and higher education programmes which can help prepare for an apprenticeship be expanded and or made more visible?

The messaging about apprenticeship needs to be simplified for both students and adults considering entering apprenticeship. The function of the programmes as an apprenticeship pathway should be given a national brand.

26 What approach to target setting should be taken to in the new Action Plan, in relation to participation generally and for under-represented groups?

- a) Future Skills Needs analyses;
 - b) Industrial sector surveys, as many Irish companies have large numbers of craftworkers working abroad.
 - c) Quotas for under-represented or marginalised groups with recruitment efforts targetted at these groups, such as the children of ethnic minorities, migrants or the so-called new Irish
 - d) Potential for apprentice graduates to progress further and fill gaps in skill supply at levels 7 and 8. See example of level 7 electrical engineering apprenticeship in Limerick IOT
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27 Which, if any, of the Government Apprenticeship initiatives are you familiar with and how effective do you consider them to be?

Very familiar and fully aware of ongoing successful improvements.

28 How should the promotion of apprenticeship be further developed under the new Action Plan?

Development of a Schools programmes to enable:

- 1 Information given prior to entering second level education may inform students when choosing subjects which may prepare them for apprenticeships
 - 2 A special educational programme for T.Y. students ought to be developed and delivered nationally.
 - 3 Guidance Counsellors should be informed of all requirements and pathways to apprenticeships
 - 4 Apprentice champions – current or recently graduated apprentices should be developed, and they should give presentations on social media. This might have a better effect than sending guest speakers into schools. It is important that these champions would give a realistic view of the apprentice career path
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29 What role can the public sector play to expand the availability of apprenticeship, through its roles as employer and substantial purchaser?

DPER should assume a role in overseeing apprenticeships within the public sector. This could ensure that public sector apprenticeships are of the highest quality and have access to all facets of the apprenticeship training whilst on the job. This could be achieved by rotating apprentices through Local Authorities, Office of Public Works, Defence Forces, Hospitals and Educational institutions. In its role as a substantial purchaser, the state is allowed under EU tendering rules to attach conditions on apprentice recruitment to particular projects or purchases. A scoping study for such an initiative should be commissioned by DPER.

Conclusion:

For the first 100 years of this state and indeed before that Connect Trade Union has invested in the apprenticeship system and more importantly the apprentices themselves.

Now in the 21st century while recognising the changing technological world we still believe the role of proper and experiential apprenticeship training is as important as ever even more so now considering the challenges we currently face.

Connect Trade Union believes in work -based apprenticeships and the earn as you learn principle. This is of particular importance for those from the more disadvantaged communities and sectors of society.

We currently have a system where all stakeholders have a facility to contribute to the development and design of a modern apprenticeship system. We believe that this model has in the past served the state, employers, trade unions, apprentices and society well and therefore strongly recommend that any new or amended system must continue to maintain a world class standard of apprenticeship based on both the needs of the employer and the apprentices and would call on the Minister, Solas, employers and all stakeholders to feel free to engage with Connect Trade union regarding any aspect of this submission or indeed any concerns they may have regarding the future of apprenticeships in Ireland.

Paddy Kavanagh

General Secretary Connect Trade Union

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