**Edge Response to DfE’s Flexi-Job Apprenticeships consultation**

Link to the consultation: [Flexi-job apprenticeships: reshaping the role of apprenticeship training agencies - GOV.UK (www.gov.uk)](https://www.gov.uk/government/consultations/flexi-job-apprenticeships-reshaping-the-role-of-apprenticeship-training-agencies)

**Question 1: Do you agree with our vision for flexi-job apprenticeship schemes?**

We broadly support government’s overall ambition to deliver more flexible apprenticeships. In principle, this is a sensible initiative, as long as flexibility doesn’t lead to a lack of accountability or compromise on quality.

We see this model working particularly well in industries with non-traditional employment patterns such as the creative, digital sectors and science parks and would caution against rolling the model out across all sectors. There should be clear justification from employers or training providers with a rationale for why flexible apprenticeships would be preferable over a longer term (minimum 12 month) placement.

We also see considerable advantages in recognising prior skills and knowledge to enable those with relevant experience to do accelerated apprenticeships. There is much we can learn from Scotland’s Foundation apprenticeship model which provides accelerated entry on completion of a specific prior qualification completed in a school or college, and from the Finnish model which recognises achievement of the necessary knowledge, skills and behaviours in a range of formal, non-formal and informal learning contexts in order to prevent repetition.

Our primary concern is for the programme to be of high quality and at Edge, we have consistently called for quality to be a key driver of the apprenticeships system.[[1]](#footnote-1) We are pleased to see the consultation document set out the need for an “operating framework that sets clear expectations on quality and performance, and assures the quality of experience of apprentices…”.

However, we are concerned that an accelerated programme may lead to a decline in quality. Although accelerated apprenticeships will enable some apprentices to complete their training more quickly, students still need the space and time to learn and embed new skills, and learners should be supported on a high quality learning journey.

Apprentices also benefit from a structured programme of support, however this model proposes “the pausing and resuming of apprenticeships between projects” and “for funding to stop and start as required”. We are concerned that the quality of provision may vary across providers and that a lack of structured support may lead to a lack of a coherent development plan for apprentices and higher drop-out rates. To remedy this, there should be a clear point of contact responsible for the overall programme, development, and welfare of the apprentice. Mentoring is a proven intervention to increase success rates and we recommend learning from successful approaches that have been trialed in Jersey, Northern Ireland and Australia.[[2]](#footnote-2)

Government also needs to be clearer in articulating the overall roles and responsibilities of employers and training providers. The overall structure of the programme is currently unclear, and it is not clear who would have overall responsibility for the welfare and development of the apprentice, and who would support the apprentice into a permanent job at the end of their programme. While exposure to a range of employers may widen an apprentice’s networks, there is a danger that the short term, cyclical programme will not provide the necessary foundations for long-term employment. We would argue that there is a strong role for intermediaries such as Apprenticeship Training Agencies (ATAs) to play a role in supporting and co-ordinating apprenticeships with employers.

In addition to learning industry-specific knowledge, the programme should also support apprentices to cultivate broader meta-skills that they can translate to different occupations and industries as they progress throughout their careers. The rotational nature of the flexi-job model would lend well to a modular approach for apprentices to bank training skills and successes as they go. For example, we can learn from examples such as Finland where units of apprenticeships are divided into distinct modules with appropriate end point assessment taken at the end of each module. Austria follow a similar modular approach where students can take on optional modules that further their opportunities, for example learning higher technical and/or software skills used in modern technology.

**Question 2: How should flexi-job apprenticeships demonstrate that they are meeting the needs of employers?**

While employer engagement is vital, we are concerned that the emphasis is currently on meeting the needs of employers, over students. We would stress that the programme must maintain a commitment to apprentices as the core customer.

The consultation document articulates that “apprentices will be in the driving seat” and that “apprentices are at the heart” of our vision for flexi-job apprenticeships. While apprentices must certainly be at the heart of the programme, we question whether apprentices are prepared enough to be the ‘drivers’. Very few 16-18 years olds would have the confidence and connections to ‘build their own’ apprenticeship, although this could be more possible for mid-career changers. The flexible apprenticeship programme should support a range of apprentices at all ages (not just older or mid-career apprentices) – this must include strong pastoral and developmental structures to ensure apprentices are supported with an appropriate, tailored programme.

However, to respond to employer needs, the programme must be forward looking, responding to labour market projections and current and future [skills shortages](https://www.edge.co.uk/research/projects/skills-shortages-uk-economy/Skills-Shortages-Bulletin-Summary/), rather than outdated practice. This should build on the changes that we have already begun to see as a result of the fourth industrial revolution, including megatrends such as automation, digital technologies and demands for a greener economy.

So collaboration needs to be at the heart of the system, with local communities joining forces to identify and provide employment and training opportunities. We would encourage join up between forums such as the proposed Local Skills Improvement Plans, Chambers of Commerce model as well as Colleges, Training providers, Combined Authorities, Local Enterprise Boards and Skills Advisory Panels to include a range of local voices and to collectively identify where flexi-job apprenticeships are most needed.

The flexible apprenticeship programme must also support apprentices to develop broader and transferable meta-skills enabling them to move occupations and industries as they progress through their careers. Currently, English apprenticeships are narrower, shorter and involve less off-the-job training than international competitors.[[3]](#footnote-3) However, employers are increasingly calling for a range of both technical and transferable skills – with research from the CBI highlighting that 60% of employers valuing broader skills such as problem solving[[4]](#footnote-4). Meanwhile LinkedIn’s Global Talent Trends highlighted that 92% of employers have said these so called ‘soft skills’ such as management, leadership and planning are equally or more important than hard skills[[5]](#footnote-5).

SMEs also need to be particularly engaged and supported to work with flexi-job apprenticeships, otherwise there is a risk that SMEs are inadvertently squeezed out if the market becomes flooded with larger employers.

**Question 3: What expectations should we set of flexi-job apprenticeship schemes in providing a high quality experience for apprentices?**

For us, quality must be a primary driver of the programme. The programme should ensure the following quality experience for apprentices:

* The aspiration must be for this to feel like a high quality graduate placement scheme with an overall plan and structure, rather than an unstructured series of placements.
* There should be no numerical target for apprenticeship starts. Instead, there should be a basket of indicators relating to quality, including feedback from apprentices and employers, completion rate statistics and destinations into employment.
* A clear route into employment destinations. Apprentices are supported to secure employment or to progress into appropriate further learning at the end of the apprenticeship.
* A clear point of contact, either within the provider, employer or training agency who acts as a consistent presence in the partnership and ensures that the apprentice secures appropriate pastoral, developmental and welfare support.
* Apprentices should be exposed to a range of high-quality, planned and co-ordinated placements with a range of employers.
* The scheme provider should work with the apprentice and employers to outline a credible plan to ensure that all of the placements will deliver a high standard for the apprentice. Movement between placements must not disrupt learning or the development of knowledge, skills and behaviours
* Where relocation is necessary, the apprentice is given appropriate support and maintenance funding to relocate

**Question 4: What challenges and opportunities are relevant to flexi-job apprenticeship schemes achieving financial sustainability? How might they balance a fee-based model with other income streams?**

We would argue that flexi-job apprenticeship schemes should be allowed to receive levy transfers from levy paying employers.

**Question 5: Does the name flexi-job apprenticeship scheme accurately describe our vision for these organisations and they role they will play? Would you propose any alternative names?**

The name flexi-job apprentice implies a non-committal or part time programme and risks creating a two-tier structure. We would recommend maintaining the single name apprenticeship and simply referring to these changes as ‘apprenticeship flexibilities’.

**Question 6: Do you have any views on our proposals for portable apprenticeships, including on how portable apprenticeships and flexi-job apprenticeships schemes can complement each other?**

While we see the benefit in the portable apprenticeship, we are concerned around how the needs of individual apprentices will be safeguarded. The description currently highlights the benefits to employers, but there is little mention of how the programme will directly benefit apprentices.

The current model of portable apprenticeships could leave apprentices with limited chances of securing sustainable employment. Coupled with a lack of pastoral or development support, there is a danger that some apprentices may not complete the programme, particularly if there is a considerable delay between placements, or if placements are of low quality.

Government should consider developing appropriate exit points at certain stages of the programme, and provide a qualification or credit to demonstrate completion of certain parts of the programme. For example, each placement could be complemented with a proportionate end point test or the creation of a clear portfolio of achievement or completed projects so that apprentices can bank training and successes as they go.

**Question 7: Do you agree that we should create a register of approved flexi-job apprenticeship schemes?**

Yes. However, while employers should play a key role in developing the flexi-job apprenticeship schemes, we are concerned that we inadvertently strip out many of the existing ‘coordinating’ organisations in the system (such as existing ATAs) as it moves to a more market- driven system.

In opening up the flexible apprenticeship model, we also question the inadvertent impact this might have on the market. As we open up the market to more employers and training providers, there is a risk that a more flexible model may require more time and capacity to develop ‘tailored’ or bespoke programmes. We question what sorts of organisations will be able to engage with this more bespoke model and are concerned that SME’s will become squeezed out from market forces, due to lack of capacity or lack of time. This is already prevalent in our current apprenticeships system where small enterprises have often found it more difficult to engage with the apprenticeship system than larger employers.[[6]](#footnote-6)

Rather than the register being favoured towards larger employers, it is critical that employers of all sizes are able to apply, including SMEs.

**Question 8: What entry criteria do you think we should establish for admission to this register in order to ensure that approved flexi-job apprenticeship schemes meet our vision set out in section 2?**

We would not be too prescriptive on this but key criteria should include:

* An evidenced argument that the provider can provide high quality flexi-apprenticeships for individuals from all backgrounds and ages
* An evidenced argument that the programme will deliver on employer needs and meet labour market priorities [eg current skills shortages, wider Government priorities such as the Green Skills agenda]

**Question 9: How do you think the performance and quality of approved flexi-job apprenticeship schemes should be monitored and assured after admission to the register?**

Our particular concern is around the quality of the programme. We must ensure that quality is a prime driver and is not compromised over flexibility or speed, or a lack of accountability.

The flexi-apprenticeship scheme should be subject to ESFA and Ofsted monitoring to ensure that the scheme is of high-quality and meets the needs of apprentices. In [Our Plan for Apprenticeships](https://www.edge.co.uk/documents/87/edge20e2809320apprenticeships20report2028final20-20web29_41nXjVp.pdf), we built on the work of Professor Lorna Unwin and Alison Fuller, calling for employers and training providers to use an ‘expansive-restrictive continuum’ as an analytical tool. At the expansive end, employers understand that apprenticeships offer a key way to sustain and enhance the expertise of their workforce, offering a solid platform to develop new skills and knowledge. At the restrictive end, the focus is on filling production gaps and gaining accreditation for existing skills.

The aim is not to judge ‘restrictive apprenticeships’ as being worthless, but ESFA and Ofsted should instead trigger a set of questions so that employers and training providers can plan (and monitor) how they might move their provision further towards the expansive end of the continuum.

Supporting this, a national programme of peer support led by training providers and employers who run quality apprenticeships would help build capacity and have a much bigger impact than trying to dictate quality through top-down policies or initiatives.

**Question 10: To assure the quality of flexi-job apprenticeship schemes, should schemes entry to the register set out the standards they can offer to apprentices? What process should we develop to enable schemes to change the standards they offer?**

Yes, but changes to standards can often involve a long and bureaucratic process. Standards should only be expanded into occupations where there is a clear need and demand.

**Question 11: Do you have any concerns about the closure and withdrawal of the dormant register of ATAs?**

It is sensible to have an updated list of providers, however it may me sensible to work with the existing register rather than remove it completely. However, we are concerned that by opening up the scheme to more providers and employers, smaller SMEs or existing ATAs may be squeezed out of the system in favour of larger employers. Government may want to consider how to ensure a balance of applications, particularly considering how SMEs may be supported with their applications.

**Question 12: Do you agree with the parameters we have proposed for how any funds awarded should be used?**

The parameters sound sensible, but Government may want to consider:

* Funding should be prioritised on programmes that will address skills shortages and wider government priorities – particularly digital skills, green jobs, creative industries, construction, and nursing[[7]](#footnote-7)
* Quantity and apprenticeships starts are often set as the driving force for apprenticeships, at the expense if quality. This is problematic, and focus should instead be placed on quality over quantity.
* The consultation highlights that when the £7m fund is opened in July 2021, it will support multiple schemes. We support this, and Government should ensure that a range of employers, particularly SMEs, are encouraged to apply in order to test and address any barriers that may face SMEs

**Question 13: Are there any capital costs that a new or expanding flexi-job apprenticeship scheme might require funding for?**

Capital costs will likely vary across sectors and across different occupations.

**Question 14: Should there be a difference in how new or existing organisations are permitted to use the fund?**

New organisations will likely have higher set up costs compared to existing organisations. Although existing organisations should also be encouraged to bid for the fund, this difference should be taken into account and funding criteria should reflect these differences.

**Question 15: Should any additional parameters to the fund be added to encourage employer engagement – for example, pledged levy funds or matched co-funding for set up or expansion costs?**

Matched co-funding should be encouraged, as employer contributions would represent a better result for the public purse. Larger employers should also be incentivised to support SMEs in their local areas via pledged levy funds and these discussions should take place at the local and regional level.

**Question 16: Do you have any views about the implications of the proposals set out in this consultation on people with protected characteristics, as defined in section 149 of the Equalities Act 2010? What evidence do you have on these matters?**

Some learners face additional barriers in accessing education – so we will need to ensure that finance and grants meet these demands. If the scheme involves relocation, we must ensure that there is appropriate support and funding available, particularly to support disadvantaged learners.

Pupils with special educational needs and disabilities (SEND) can also often face extra barriers in their education and employment journey, including inaccessible resources and lack of specialist support. [[8]](#footnote-8) So the programme should be carefully planned, designed and fine-tuned to support SEND pupils interests, aspirations and needs. This can be done with teachers and employers collaborating to design and adjust activities and may involve extra wrap-around support (such as personal tutors, classroom-based learning, and reflection sessions) to enable SEND students to fulfil their full potential.

1. [edge20e2809320apprenticeships20report2028final20-20web29\_41nXjVp.pdf](https://www.edge.co.uk/documents/87/edge20e2809320apprenticeships20report2028final20-20web29_41nXjVp.pdf) [↑](#footnote-ref-1)
2. [edge20e2809320apprenticeships20report2028final20-20web29\_41nXjVp.pdf](https://www.edge.co.uk/documents/87/edge20e2809320apprenticeships20report2028final20-20web29_41nXjVp.pdf) [↑](#footnote-ref-2)
3. [edge20e2809320apprenticeships20report2028final20-20web29\_41nXjVp.pdf](https://www.edge.co.uk/documents/87/edge20e2809320apprenticeships20report2028final20-20web29_41nXjVp.pdf) [↑](#footnote-ref-3)
4. [The Business View | CBI](https://www.cbi.org.uk/the-business-view/) [↑](#footnote-ref-4)
5. https://business.linkedin.com/content/dam/me/business/en-us/talent-solutions/resources/pdfs/global\_talent\_trends\_2019\_emea.pdf [↑](#footnote-ref-5)
6. [Making apprenticeships work for small and medium enterprises (europa.eu)](https://www.cedefop.europa.eu/files/9102_en.pdf) [↑](#footnote-ref-6)
7. [04.05.21\_Skills\_shortages\_bulletin\_summary.pdf (edge.co.uk)](https://www.edge.co.uk/documents/167/04.05.21_Skills_shortages_bulletin_summary.pdf) [↑](#footnote-ref-7)
8. [A journey to employment for young people with additional needs | Edge Foundation](https://www.edge.co.uk/research/projects/case-study-reports/A-journey-to-employment-for-young-people-with-additional-needs/) [↑](#footnote-ref-8)