



# **Irish Congress of Trade Unions**

Submission to Department of Further and Higher  
Education, Research, Innovation and Science.

Apprenticeship Action Plan 2021 – 2025.

**September 2020.**

## 1. Introduction.

2. The Irish Congress of Trade Unions is the largest civil society organisation on the island of Ireland representing over 800,000 workers in all sectors of the economy. Congress welcomes the publication of the consultation paper on a new apprenticeship action plan for the period 2021 to 2025. Apprenticeship is an important part of the national education and training system. It provides workers with an opportunity to gain skills and valuable work experience within a structured programme while in employment. It is therefore both prudent and necessary to regularly review the operation of the national apprenticeship system.
3. As the consultation paper acknowledges a key strength of the national apprenticeship system is the embedded culture of consultation and collaboration between a range of stakeholders. As Minister Harris points out in his foreword to the consultation paper ***“No education and training programme relies more heavily on a broad range of actors and stakeholders than apprenticeship”***.
4. The continued importance of the apprenticeship system was confirmed by two recent government commissioned studies. The first on productivity in the construction sector<sup>1</sup> was undertaken by KPMG, Future Analytics and Technological University Dublin. This recommended a number of measures to strengthen the system. The second report - The Future Skills Irish Construction Sector<sup>2</sup> - was undertaken by AECOM Consulting and concluded that the apprenticeship system should be enhanced so that it can meet the future skills needs of the sector.
5. The consultation paper is also seeking the views of stakeholders on measures that may be put in place in order to increase the participation of women and people with disabilities in apprenticeship. The appointment of a senior minister with responsibility for further and higher education should provide the impetus to strengthen the system of apprenticeship, to improve participation rates and ensure that it is seen as a viable option for young people and adult learners.
6. At the outset we wish to place on the record that Congress is generally supportive of the proposed broad objectives of the new action plan, namely: the development of a consolidated apprenticeship system with a single coherent model of governance, that is appropriate to the system that has evolved and is inclusive of stakeholders. The achievement of this objective will require a renewed focus on addressing a number of weaknesses in the current system that, in our view, discourage young people and adult learners from viewing apprenticeship as a viable and attractive option.

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<sup>1</sup> <https://www.gov.ie/en/publication/94929-pre-covid-19-productivity-research-in-construction-sector/>

<sup>2</sup> This report was commissioned by the Department of Business Enterprise and Innovation. The report will be published shortly.

7. The consultation paper is structured around three key themes and seeks the views of respondents on a range of questions. In this submission we have sought to respond to the key issues. This submission will:

- share our experience of how the current apprenticeship system operates and some of the weaknesses we have identified;
- comment on the current governance and operational model for apprenticeship and suggest a reformed structure that will mean responsibility for the apprenticeship system as a whole will be the responsibility of one state agency;
- suggest a new system for the registration of skills with responsibility for the development and maintenance of a statutory skills passport being assumed by the new agency;
- suggest some ways of potentially increasing participation in apprenticeship; and
- comment on the future funding of apprenticeship.

## 8. Apprenticeship Today.

9. Vital to the successful operation of the apprenticeship system is the existence of the national network of training centres. Continued investment and expansion in the network of centres is crucial if apprenticeship is going to be seen as a credible alternative for young people and adult learners.

10. The consultation paper (Appendices 2 and appendix 3) provides useful and relatively up to date data on the number of apprenticeship registrations and the apprentice population. The data shows the numbers involved in both the craft apprenticeships and also those involved in the new consortia-led apprenticeships, between the period 2015 to 2019.

11. While the data shows that, in general, there has been an increase in the uptake of apprenticeship the targets set in the current action plan have not been met. It is also evident from a more granular analysis of the data that there are some apprenticeships that are struggling to attract significant numbers.

12. This is particularly the case for what are commonly known as the 'wet trades' in the construction sector i.e. brick and stone laying, floor and wall tiling, painting and decorating and plastering. It is our strong view that the fall off in apprentices in these trades is directly linked to employment practices within the construction sector and a significant devaluing of apprenticeship training. Employers, in the main, no longer require workers to demonstrate that they have completed an apprenticeship in order to attain work. This is also coupled with the practice, rampant in the sector, of misclassifying workers as self-employed. This has resulted in a significant fall off in the numbers commencing and completing an apprenticeship in the 'wet trades. These developments have contributed to low quality outcomes in some construction projects and there is an urgent need to develop a specific, targeted strategy to halt the decline of 'wet trade' apprenticeships. We

will discuss later in this submission the idea of a statutory Skills Passport which we believe has the potential to address this issue.

**13.** It is also evident that far more could be done to make the craft apprenticeship more attractive. The costs imposed on apprentices by the Institutes of Technology (IOT's) are a clear disincentive. There are however, other operational issues that need to be addressed. This is particularly the case when it comes to 'off the job placement' (OTJP). Central to the resolution of these issues is increased and ongoing capital investment in the network of training centres. Some of the operational difficulties we have encountered include:

- **Delays in allocating OTJP.** The allocation of OTJP is based on a list system. While this system has worked well there have been some delays. A thorough analysis is required to identify the reasons why there may be delays in offering apprentices an OTJP. The outcome of this analysis should inform how delays can be minimised. It should also result in a general commitment as to the maximum time that an apprentice should expect to wait for an offer of an OTJP;
- **OTJP away from home.** It is acknowledged that apprenticeship training is organised on a national basis and that it may not be possible to offer OTJP for every apprenticeship in every training centre. It is further acknowledged that the list system is designed to ensure fairness and equity. However, without undermining or compromising the integrity of the system, interventions where appropriate should be made to so that an OTJP offer is as close to home of the apprentice as possible, provided it is not detrimental to any other programme participant;
- **Living away from home allowance.** Where apprentices have had to relocate there have been issues with the standard of accommodation. This in our view is linked to the relatively low 'living away from home allowance'. This allowance has not been increased in a long number of years and an urgent review is required, particularly in light of the cost of accommodation in Dublin; and
- **Facilities for Apprentices.** Where elements of the OTJP are provided in IOT's it is frequently the case that apprentices are denied access to facilities enjoyed by other students in the same setting e.g. car parking, gym etc. This should not be the case.

We have also encountered a practice where an employer will employ a worker as an apprentice, but has no intention of registering that worker with SLOAS or allow them to be released for OTJP. Later in this submission we will argue for the creation of a single new national agency with responsibility for the apprenticeship system as a whole. In our view such an agency should have the power to impose significant penalties where an employer is found to be behaving in this way.

**14.** The reasons behind the failure to reach targets for new consortia-led apprenticeships in the current action plan are less evident. It may be that potential scope for such apprenticeships was over estimated at the outset. What is clear however, is that the new consortia-led approach to apprenticeship training has resulted in the development of

some excellent training opportunities in areas such as finance and ICT. It is our belief that the potential for new consortia-led apprenticeships can best be explored in the context of our proposals for a new governance framework for apprenticeship in the next section of this submission.

## **15. Governance and Operational Framework for Apprenticeship.**

- 16.** The consultation paper explains in some detail the current governance and operational framework for apprenticeship. This framework has evolved over time with establishment of the Apprenticeship Council being the most recent significant development.
- 17.** While the newly created Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) is responsible for policy in the area of apprenticeship, there are at least four other primary actors with specific and distinct roles within the framework. These are SOLAS, The Apprenticeship Council, The Higher Education Authority (HEA) and Quality and Qualifications Ireland (QQI).
- 18.** There is little doubt that the current framework has evolved for good and legitimate reasons. However, it is clear that if the framework for apprenticeship was being designed from scratch, it is highly unlikely it would resemble what is currently in place.
- 19.** It is the view of Congress that the establishment of DFHERIS presents an opportunity to simplify the framework and provide a clear and coherent focus on apprenticeship. We agree with the suggestion in the consultation paper that we should move single, coherent model of governance. In our view this best achieved by the creation of a new agency under the auspices of DFHERIS which would have responsibility for apprenticeship as a whole.
- 20.** While there is significant work involved in the creation of a new agency there are a number of key principles that we believe should be adopted to guide its establishment, and number of key responsibilities that would be vested in the new agency. The following list is not exhaustive or prescriptive:
  - the new agency would have sole responsibility for the provision of apprenticeship;
  - the overall governance of the new agency should be inclusive of all actors with a legitimate interest in the development of apprenticeship. The current Apprenticeship Council may be a useful starting point;
  - the agency would continue to recognise and promote the two forms of apprenticeship currently in existence, namely craft apprenticeships and consortia-led apprenticeships;
  - the new agency would have responsibility for increasing the number of participants undertaking apprenticeship and would be responsible for the promotion of apprenticeship;
  - the new agency would have responsibility for the development and maintenance of a National Skills Register and the development of a statutory Skills Passport;

- the new agency would have responsibility for the continued development of training programmes and curriculum;
- the new agency would be responsible for the provision of OTJP;
- the new agency would have responsibility for administration and distribution of funding for apprenticeship provided by government.

## **21. A New National Skills Register and Skills Passport.**

- 22.** We commented in paragraph 12 of this submission on the devaluing of apprenticeship training in some areas and the absence of a link between completing recognised training and gaining employment.
- 23.** A number of commentators have also referenced the lack of detailed knowledge and data about skills in the Irish economy and how such skills can be verified by potential employers. This is a deficit that was recognised by both the reports referred to in paragraph 4 of this submission.
- 24.** We believe that Ireland should, follow the example in other countries, and begin work on developing a National Skills Database and that the new agency suggested in the earlier part of this submission should be charged with its development. The new agency should also have responsibility for the development and issuing of a skills passport that would be retained by individual workers, which would be updated to reflect continued attainment of skills and qualifications and would be required in order to obtain employment.
- 25.** A National Skills Database has obvious advantages, including the provision of vital information that would assist in ensuring that available skills are matched to the needs and requirements of our economy and labour market. It would also, if linked to employment attainment and work, provide an important incentive to undertaking and completing apprenticeship training.
- 26.** While there are some practical issues to consider in the development of a National Skills Database, including the transfer of data located in other agencies, the recognition of historical qualifications and the recognition of qualifications from other countries we would suggest that finance be sought as part of the next round of estimates so that that work can commence on this project.

## **27. Making Apprenticeship More Attractive.**

- 28.** One of the stated objectives of the new action plan is to position apprenticeship as a valued and attractive option within the Further and Higher Education system.
- 29.** As mentioned earlier the costs imposed on apprentices by IOT's are a clear disincentive. There is also a need for a well-resourced campaign that demonstrates that an apprenticeship will lead to quality and well-paid employment. Promotion of quality

apprenticeships should include active engagement with second level schools to stimulate interest. It is regrettably the case that a young person considering an apprenticeship in construction is likely to be discouraged because of the precarious nature of employment in that sector.

- 30.** There are other practical measures that can be introduced. Providing pathways for further education and training post apprenticeship could be a valuable incentive. Apprentices and tradespeople should be provided with supports to access micro-accreditation programmes to assure their skills are updated and relevant. Apprenticeship mobility should be promoted to employers and apprentices, particularly under the European Commission ErasmusPro scheme.
- 31.** It has been suggested that minor change to the 7-phase programme for craft apprenticeships - as illustrated on page 13 of the consultation paper - could make a significant difference. Altering the phases so that an apprentice commences his or her training with an off the job placement would mean that an apprentice would be better equipped to commence work and be of more value to his or her employer.
- 32.** A shared objective of the new Action Plan is to increase participation in apprenticeship amongst under-represented groups, in particular woman and people with disabilities. There is an incorrect and stereotypical view that apprenticeship will lead to employment that is more suited to men. The well-resourced campaign referred to in paragraph 29 of this submission should include messaging that will address this issue and should be informed by successful methods that have been used in other countries, but also by dialogue with groups representing woman and people with disabilities.
- 33.** There should also be a renewed effort to encourage older people to look at apprenticeship as a means of updating and developing new skills. Adult apprenticeship can also play a key role in providing opportunities for workers who are currently working in industries that are likely to be significantly curtailed in the move to a low or zero carbon economy. However, one measure that needs to be addressed is income levels for adult apprentices. Adult apprentices are more likely to have significant financial commitments and support measures that would ensure that their income matches the norm in the relevant sector will be needed to ensure that apprenticeship is a feasible option.
- 34.** The state as an employer can play an active role in increasing participation. Local Authorities and the HSE should be required to increase the number of apprentices they sponsor each year. While most semi-state companies do have apprenticeship recruitment programmes, that sector should be required to do more. Government, through the new agency should be an enabler of this. The unions in the state and semi-state sector encourage employers to increase the number of apprentices they sponsor and will continue to do so.

**35.** As the consultation points out, the state is also a substantial purchaser and opportunities do arise where that state can insist on contractors employing apprentices. While this has happened in some instances, for example on major capital projects, there is potential beyond construction. The state is a purchaser of services from the financial services sector and from the ICT sector and should use its leverage to increase participation in some of the apprenticeships in those sectors. The state's shareholding in the banking sector might also be a vehicle for increasing participation.

### **36. Apprenticeship Funding.**

**37.** As the consultation paper points out, apprenticeship training provides clear and long term benefits not only to the apprentice but also to employers and to the economy.

**38.** In the main, funding for apprenticeship is provided through the National Training Fund (NTF). Central government also provides funding through Solas for some aspects of the new consortia-led apprenticeships. Congress has long sought a modest increase in the employers' contribution to the NTF. While some of the suggestions made in this submission will increase participation, it is our view that an increase in the available resources through the NTF will make a significant contribution to the meeting the objectives of the new Action Plan. Monies from the NTF and the additional resources provided to finance consortia-led apprenticeships should be provided to the new agency in the first instance.

### **39. Conclusion.**

**40.** In this short submission we have sought to provide our views on how the system of apprenticeship can be reformed so that it plays a bigger role in the system of Higher and Further Education. We have suggested some significant structural reforms to provide more coherence and suggested initiatives that, in our view, will increase participation.

**41.** We have sought to address the questions posed in the consultation paper and we have appended a table to this submission as guide for ease of reference.

**42.** There is a significant cultural issue to be addressed if apprenticeship is to be regarded as high value in the eyes of young people and, importantly, by parents also. Secondary schools are often judged by the number of sixth year students that go on to third level education. In the eyes of some this benchmark is what constitutes a good school and therefore apprenticeship is regarded as a poor second cousin.

**43.** Congress is fully committed to working with Government and other stakeholders to improve the apprenticeship system. Minister Harris has spoken of his ambition to develop a system of apprenticeship in Ireland to one on a par with that found in Germany. Research suggests that there is much in the current system of apprenticeship in Ireland



that is as good if not better than what exists in Germany. However, it is clear that improvements can be made.

- 44.** Our shared ambition should be to become a world leader in apprenticeship training. Fulfilling this ambition will require increased investment. Achieving this objective will provide significant, valuable and long term economic and social benefits.

**45. ENDS.**

Question No.	Question	Response
1.	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?	Paragraphs 15 to 25
2.	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?	Paragraphs 15 to 25
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?	Paragraphs 15 to 25
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?	Paragraphs 15 to 25
5.	Reflecting the partnership between multiple stakeholders in delivering apprenticeship, what governance and management structures are appropriate for a single governance model?	Paragraphs 15 to 25
6.	How should the current roles of the Apprenticeship Council, SOLAS and the HEA be performed under this model?	Paragraphs 15 to 25
7.	What role can be played by sectoral or regional structures and bodies in the governance and management of apprenticeship?	Paragraphs 15 to 25
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?	Paragraphs 15 to 25
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?	Paragraphs 15 to 25
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?	Paragraphs 15 to 25
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?	Paragraphs 15 to 25

12.	How can apprenticeship provision be integrated into the quality assurance, administrative and academic leadership arrangements for Further and Higher Education Institutions?	Paragraphs 15 to 25
13.	What, if any, changes to the structure or delivery of the craft and consortia-led programmes do you consider necessary?	Paragraphs 15 to 25
14.	How should apprenticeship be funded?	Paragraphs 36 to 38
15.	What, if any, role should financial incentives play in encouraging participation in apprenticeship?	Paragraphs 36 to 38
16.	What, if any, changes are required to the funding allocation mechanisms for apprenticeship?	Paragraphs 36 to 38
17.	How should the impact and cost effectiveness of apprenticeship be evaluated?	Paragraphs 36 to 38
18.	Which cost elements of apprenticeship impact most on employers?	Paragraphs 36 to 38
19.	How can the cost/benefit balance of participation in apprenticeship be improved for employers?	Paragraphs 36 to 38
20.	How can small enterprises be supported to participate in apprenticeship?	Paragraphs 36 to 38
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?	Paragraphs 36 to 38
22.	How well are the benefits of, and opportunities to apply for, an apprenticeship currently promoted to young people and adults?	Paragraphs 27 to 35
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?	Paragraphs 27 to 35

24.	What, are your views on the provision of specific financial and non-financial incentives to increase participation by under-represented groups?	<b>Paragraphs 27 to 35</b>
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?	<b>Paragraphs 27 to 35</b>
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?	<b>Paragraphs 27 to 35</b>
27.	Which, if any, of the Government Apprenticeship initiatives are you familiar with and how effective do you consider them to be?	<b>Paragraphs 27 to 35</b>
28.	How should the promotion of apprenticeship be further developed under the new Action Plan?	<b>Paragraphs 27 to 35</b>
29.	What role can the public sector play to expand the availability of apprenticeship, through its roles as employer and substantial purchaser?	<b>Paragraphs 27 to 35</b>