

To Whom It May Concern,

I am responding to the consultation on behalf of ISME. This submission can be published if you wish.

It is important to be aware that 52% of all employees are employed in SMEs and 68% of those employed in the private sector are employed by SMEs. For apprenticeships to be sustainable it is therefore essential that SMEs can engage in taking on apprentices. This means that it cannot be made difficult for SMEs to take on apprentices on account of requirements that put them at a disadvantage to larger organisations. It should also be pointed out that the experience an apprentice gets with an SME is often of greater depth and variety than in larger companies as it is often needed for them to take on more responsibility and learn more things as that is what an SME needs them to be able to do.

In the White Paper there are a few areas that could be more clearly defined so that the intention of the paper is taken into practice and that requirements for QA do not become onerous for any of the providers.

We would be concerned that Co-ordinating Providers may use their position not to engage with other legitimate providers or to make it extremely difficult for other providers to offer the apprenticeship. This should be monitored in some way, as there may be providers who are not the co-ordinating provider who are actually better qualified to deliver the programme. There could also potentially be anti-competitive activity by the Co-ordinating Provider.

It may be useful to provide templates of Memoranda of Understanding or Memoranda of Agreement, or at least have a check list of what needs to be included in these Memoranda.

It would also be imperative that the apprenticeship systems are NOT dependent on the working of an academic year. Off the job training should be available on a year round basis if the demand is there for it.

*p. 19. N. Agree and implement a system with employers for evaluation and review of employer training capacity and for addressing any gaps in that capacity.*

The co-ordinating partners also need to make sure that they don't alienate SMEs by making these requirements onerous with red tape. Pragmatic systems should be introduced. External oversight of the systems introduced by Coordinating Providers needs to be done to ensure that it is not over complicated or excludes employers who could be valid apprentice employers.

*p.20. Agree a system for smoothing demand surges and collapses in the light of labour market forecasts.*

This isn't really pragmatic. But what needs to be looked at to manage the situation as best as possible is: What/whose labour market forecasts will this be decided upon? What kind of risk profile is preferred, i.e. reduced numbers taken on as apprentices if x predicts a reduction in the number of apprentices in the area to be needed in x number of years, or qualify as many apprentices as possible in the period up to when there is a labour market reduction forecast, etc.? What happens if the forecast is wrong? It is really about managing the supply not the demand and managing the fallout should there be a sudden drop in apprenticeship requirements.

p.21. It is essential that Programme Boards include SME owner managers or representatives of SMEs to ensure that the needs and ways of working of SMEs are not overlooked.

p.22. To what end is the binding Memoranda of Understanding or Agreement being made?

p.23. Quality on the Job Training.

We would be concerned that the systematic approach for approval of employers of apprentices would reject potentially strong employers due to lack of understanding and onerous criteria developed by the Co-ordinating Provider.

3.7.9

The principle behind this is understood as quality on the job training needs to be provided. However, the guidelines provided have potential for unmanageable criteria being used and mayhem for industry, especially SMEs. (e.g. A co-ordinating provider may decide, to tick the box, that all apprentice employers should have their staff trained in Train the Trainer and/or qualified mentors, etc.

b Co-ordinating providers need to be careful not to be biased in favour of big business and overlook the fact that the variety and depth of knowledge learned in an SME can often be better than with a large organisation as they are not required to specialise in a particular area but to be generalists. Just because a company is big, doesn't mean that the level and breadth of experience is what is required and just because a company is small, it doesn't mean that they can't get the level and breadth of experience required.

g. Why is it the apprentice that can appeal the judgement? Could an employer not appeal the judgement which has been made against them?

3.7.10. Regular communication is important. The quality system should indicate how communication between the off-the-job and collaborating providers and the employers will be managed and the related process.

3.7.11

Smoothing recruitment to strategic long term market demand is not pragmatic as per the points made regarding p.20.

3.7.11. b

Why only in relation to smoothing surges? Surely the employer should be able to appeal the decision not to allow them to employ apprentices. This process should be transparent and there should be a possibility to have external oversight of this if necessary, i.e. external to the co-ordinating provider and Programme Board.

p. 28. The consortium will be the sole group recognised for the training of apprentices within the occupation.

This should be limited to a particular time frame and then be reviewed, as over time, others may come to the market who are more appropriate to the development and delivery of up to date training in the occupation and the original consortium, or significant parts of it, may not be functioning properly. There needs to be a possibility of re-tendering for the consortium or changing the co-ordinating provider, etc.

4.2.2. Apprentice recruitment, progression and recognition

Where enthusiastic and able existing employees, whose prior learning is significantly less than the peer group, are being proposed for registration, these learning gaps should be identified and appropriate support offered.

Who identifies the learning gaps, who offers the support, etc. And is the prior learning detailed above assumed to be certified formal learning? Surely it should be competence based? And if so, is

there some way of assessing the individual's competence to participate in the programme other than just formal qualifications?

#### 4.2.4.1 Staffing in the Employer's Enterprise

Have mentoring training. Traditionally this has not been the case in apprenticeships and they have been successful for many years. We would be concerned that this may automatically become a requirement to prove that the mentors in the employer have received specific mentoring training. This may make apprenticeships unattractive to SMEs.

An agreed set of responsibilities with respect to apprentices. This needs to take into account how SMEs work.

Apprentice ratios if used need to be rationalised.

#### p. 38 Assessment of "on the job"

Continuous record of experience. It would be useful that the different apprenticeships would have a check list that could be ticked off, signed by both the apprentice and the "mentor" and dated as the experience and assessment is successfully completed.

#### p.51 Management Information and Data

Point 3 regarding relevant information on the apprentices learning.

As this is personal and there may be issues around data protection; it would make sense that it is the responsibility of the apprentice to keep the relevant information and pass it from provider to provider. The format could be standardised and protected to ensure that the information is easily available, possibly through an intranet system which would have a personalised log in and which different providers can add to when the apprentice is registered with them but is not accessible to them if they are not registered with them.

#### Guidelines to the Memoranda of Agreement

These are beneficial but it would be useful to share best practice for these (longer term or if there are examples from before or abroad) or to have more detail on what is expected to be provided.

Liz Carroll  
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