

Response ID ANON-NJ5H-3B9P-K

Submitted to **Apprenticeship funding: A review of the eligible and ineligible costs of training**

Submitted on 2021-01-09 13:08:29

1 Background to the review

Respondent details

Name

Enter name below::

Teresa Frith

Organisation (or the name of the group you are representing).

Please enter organisation name :

Association of Colleges

Email address

Enter email below::

teresa.frith@aac.co.uk

Which of the following best describes the capacity in which you are responding to this consultation?

Choose answer from dropdown list:

Provider representative body

If Other, please give details:

Would you like us to keep your responses confidential?

No

Reason for confidentiality:

Would you be happy for us to contact you for further information if required? If yes, what is the best way to contact you?

Yes

Please comment below:

teresa.frith@aac.co.uk

07827 929423

2 Apprenticeship Funding Policy: Eligible and Ineligible Costs

a) Do you agree with the approach of having a list of eligible costs and a list of ineligible costs? If no, how could our policy better ensure that it is clear what apprenticeship funding is to be used for?

Please comment below:

It is important to be able to differentiate between what can and cannot be funded. The principles that determine what is and is not funded need to be clearly explained and communicated. Any lists may omit some areas unintentionally, so the principles for the differentiation need to be clear in order that disputed costs can be determined to be eligible or otherwise. It is our belief that eligible costs should be any costs that are demonstrably required for the delivery of high quality off the job learning to an individual where that learning is required by the individual to successfully complete their apprenticeship and/or are required to meet the funding rules in force at the time. This includes costs related to planning, integration, delivery and assessment of learning.

3 A review of the current eligible costs

3.1 Overview

3.2 Eligible cost: Off-the-job training

a) Do you agree that apprenticeship funding should continue to fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Yes.

This is the single most important element.

b) Do you think we have been clear about what costs can be included as off-the-job training (e.g. tutor costs and delivery location costs)? Are there any other costs that we should consider here? Please explain your answer.

Please comment below::

We believe whilst the cost of delivery is critical as an eligible cost, there needs to be recognition of the cost of planning and preparation of that learning also. Whilst overall programme delivery approaches and content may well be developed at provider level, the actual programme will need to accommodate the needs of both the employer and the individual apprentice. Without this, delivery will be less effective.

Some recognition that a cohort made up of apprentices from a number of employers v a cohort from a single employer would also be helpful in rebalancing the distribution of funding.

3.3 Eligible cost: Additional learning and / or the cost to re-sit a mandatory qualification exam

a) Do you agree that apprenticeship funding should continue to fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Covering the cost of a resit (and associated learning) seems reasonable and should be in line with funding for other qualification resits outside apprenticeships.

b) Do you think that this activity (additional learning and / or the re-sit) could be viewed as activity we have already funded (and therefore should not fund again)? Please explain your answer.

Please comment below::

As above

c) If apprenticeship funding continues to fund a re-sit linked to a mandatory qualification, do you think there should be a limit on the funding available (e.g. on the proportion of the cost that is eligible for funding or a cap on the number of times an apprentice can re-sit using apprenticeship funding)? Please explain your answer.

Please comment below::

A single resit should be sufficient in most instances. If the candidate is not ready to pass the assessment then one must question why they were put forward to sit it. If another factor (such as nerves or a disability) are preventing success rather than lack of preparedness then it would seem reasonable to consider allowing funding for further attempts. No candidates should be precluded from undertaking further attempts at assessment, but funding should come from elsewhere and the contract between the employer and the provider should clearly indicate who will pay.

3.4 Eligible cost: Additional learning required to re-take an end-point assessment

a) Do you agree that apprenticeship funding should continue to fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this

Please comment below::

It seems reasonable to fund any additional learning required prior to resitting an EPA. This would particularly be the case where there has been an extended gap between the original learning and the second EPA.

The question of who funds the second EPA should be clear within the contract between the employer and the provider.

b) Do you think that this activity (additional learning before a second attempt at end-point assessment) could be viewed as activity we have already funded (and therefore should not fund again)? Please explain your answer.

Please comment below::

No, this would be new delivery and learning particularly focussed on the area where the candidate was unsuccessful first time around. Whilst teaching may well have covered this area, learning has NOT been effective. The real value of an apprenticeship over other forms of learning is the ability to repeat, practice and embed KSBs through experience on the job... in other words we don't all learn everything at first attempt and it is unrealistic to expect this.

3.5 Eligible cost: Materials (non-capital items) used in the delivery of the apprenticeship

a) Do you agree that apprenticeship funding should continue to fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Whilst not an activity, the 'consumable' materials associated with learning and are critical to the off the job learning and so should continue to be funded.

b) Do you think it would be helpful to add more examples to the definition of materials (if so, please give examples) or would a definitive list be too restrictive? Please explain your answer.

Please comment below::

Definitive lists risk unintended omission so we would not be inclined to support such an approach. It might be useful to further highlight the things that would specifically NOT be included as 'material' for the purpose of this rule?

3.6 Eligible cost: Registration, examination and certification costs for mandatory qualifications

a) Do you agree that apprenticeship funding should continue to fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Yes. Mandatory qualification costs are unavoidable and without them, the candidate cannot succeed.

b) Do you agree that we should continue to exclude the peripheral costs of a licence to practise, even where the license is a mandated outcome of the apprenticeship? Please explain your answer.

Please comment below::

the funding of a licence to practice (LtP) qualification has long been a 'red line' for government funding. Employers have traditionally been expected to pay for this. Within an apprenticeship, the cost of the training required towards the LtP is covered where that training is directly linked to the learning required within the apprenticeship. This concession seems equitable, with the employer paying for the costs associated with registration and certification. The employers responsibilities in this regard should be clearly identified within the contract between the provider and the employer.

3.7 Accommodation costs for training delivered through residential modules

a) Do you agree that apprenticeship funding should continue to fund this activity (where residential activity is specifically referenced in the standard)? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

We do not hold the specialist knowledge necessary to comment on this particular instance. It would seem to add significant cost to delivery and other trailblazer groups should perhaps be discouraged from using this eligible cost, or rather should be strongly encouraged to consider alternative routes to the required KSBs. There are very few jobs where there would or should be compulsory residential elements.

b) Would it be helpful to include additional information (e.g. apprenticeship standard name) where an eligible cost has been included for a specific reason? Please explain your answer.

Please comment below::

It would be sensible to insist on an evidence based rationale behind the need for a residential element to apprenticeship delivery.

3.8 Costs of an apprentice taking part in a skills competition

a) Do you agree that apprenticeship funding should continue to fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

This seems a useful way of honing KSBs for apprentices who are willing and have access to appropriate levels of competition.

3.9 Regular planned on-programme assessments

a) Do you agree that apprenticeship funding should continue to fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

On-going assessment of progress is a critical part of high quality training delivery and this activity should continue to be funded. The frequency of on-programme assessment should be agreed before the commencement of delivery and should be clear within the contract between the provider and the employer. It is also important that the on-going assessment process be reviewed in the light of experience and in the light of an individuals progress and circumstances.

b) Do you think there should be a minimum (or a maximum) frequency for progress reviews (to be monitored via the Apprenticeship Service post April 2021)? If so, what should this frequency be? Please explain your answer.

Please comment below::

The range of ability and levels of apprenticeships and the varying methods of delivery preclude the establishment of a 'one size fits all' frequency for on-programme review. What is critical is that the frequency of on-programme assessment is agreed within the delivery planning cycle and that the frequency considers the learning delivery pattern (for example a review after each block of learning). This is another example of how high quality learning and delivery will only occur where effective planning and preparation has taken place. For the purposes of monitoring through the Apprenticeship Service, it might be helpful to identify a minimum frequency requirement but be clear that the it is expected that the frequency reflect the nature, content and duration of the programme and the needs of the learner and the employer.

3.10 Formative assessment costs associated with a mandatory qualification

a) Do you agree that apprenticeship funding should continue to fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Yes, although it is unclear as to why the cost of this could not be incorporated in the paragraph that deals with other costs associated with mandatory qualifications?

It is worth noting that Mandatory qualifications that hold stand alone sector credibility or convey licence to practice, that are required to be completed BEFORE gateway can and do result in learners and employers placing less importance on EPA.

3.11 Administration directly linked to training and assessment

a) Do you agree that apprenticeship funding should continue to fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Yes. The inclusion of the administration element makes a major difference to the balance of eligible to ineligible costs, particularly a) which recognises the need for tailoring the learning for the employer and the individual that is so critical to the delivery of high quality learning.

b) Do you think it would be helpful to have a definitive list of administrative examples in the apprenticeship funding rules, or would a definitive list be too restrictive? Please explain your answer.

Please comment below::

Definitive lists risk unintended omission. It might be helpful to further articulate the reasoning behind the inclusion of 'administration' within eligible costs? Providing acceptable and unacceptable examples might also help?

4 A review of the current ineligible costs

4.1 Overview

4.2 Initial assessment including recognition of prior learning

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

No.

We strongly believe that this activity is a fundamental requirement for the development of an effective, high quality programme. Without an understanding of the prior learning and experience, aptitudes and motivations of an apprentice, a tailor made learning programme cannot be developed. In a high quality, gold ribbon offering the initial assessment should NOT be purely about ascertaining whether a candidate is eligible for funding and in terms of duration. These should be a part of this process, but a high quality offer requires much more than this.

Done effectively, this activity will result in an individualised learning programme that is more effective and likely to succeed. As this activity is currently unfunded, there is a temptation to skimp on the activity (which could also ultimately mean reducing the funding level in recognition of some aspect of the initial assessment), thus resulting in a more generic approach to curriculum delivery.

We believe that this element should be funded by government who should take a more pro-active role in identifying the depth of the initial assessment process, so that all can be confident that the comprehensive needs of the learner are at the heart of the development of the learning programme. Whilst we of course need to ensure eligibility, this should not be the sole motivator for initial assessment.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

The exclusion of initial assessment from funding can only impact negatively on the quality of apprenticeship delivery. It also disadvantages providers who do it well as the activity is not funded and can lead to a reduction in the anticipated funding level on top. This means that learners (and thus employers) can be disadvantaged and not provided with the learning and support programme within which they are most likely to succeed. Setting an 'eligibility only' regime for initial assessment can only result in a lower quality offer and could push some employers and providers towards easier to assess and support candidates put onto generic learning programmes.

Initial assessment is an important component of any learning programme, allowing the provider to ascertain things such as the learners academic level, their learning style and motivation level as well as the more expected assessment of their literacy, numeracy and digital skill levels. In a high quality offer initial assessment provides the starting point for the re-engineering of a standard learning programme to one that more precisely meets the needs of the individual learner within the circumstances that they will be undertaking their learning. This individualisation is anticipated and funded within eligible costs, but yet the tool that allows for this to be done effectively is not?

c) Do you undertake any further eligibility assessment activity once the practical period of training has started? If yes, please provide further information (including what type of eligibility assessment this is and when this occurs). Please explain your answer.

Please comment below::

N/A

4.3 Initial diagnostic testing

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Our answer for 4.2 also fits here. Diagnostics undertaken are used to contribute to the provider's understanding of the needs of the apprentice, not just to determine that they are eligible to receive funding. Again being clearer about what is required would be helpful. The process might just be a provider asking a learner for their GCSE results, or it could be a full range of diagnostic tools to build up a comprehensive picture of the learner to use to develop their learning. It would be helpful if this process was described more explicitly in terms of government expectation in order that all could have more confidence that the apprenticeship programme is indeed high quality in all instances.

It is perhaps unhelpful to have all these activities listed as they are within the rules? 'Induction', 'enrolment', 'initial assessment', 'diagnostics' can be wildly different things to different people.

A simple level of research to ascertain that a candidate is eligible to be funded for the programme and is suitable for the job seems to be a part of business as usual. Once eligibility is confirmed then more in-depth initial assessment needs to take place to allow the learning programme to be tailored to the individual as described in 4.2.

The current rules are to ensure that funding is only used where appropriate, but also to ensure a high quality offer. Initial assessment needs to do both of these things and it would be helpful if this was more explicit - and clearly separated - in the funding rules.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer

Please comment below::

As an eligibility check the impact of it remaining unfunded would be insignificant.

As a tool to be used to develop a high quality individualised learning programme the impact would be huge.

c) Is any further diagnostic testing undertaken once the practical period of training has started? If yes, please provide further information (including what type of diagnostic testing this is and when this occurs). Please explain your answer.

Please comment below::

High quality providers will continually assess the learning of their apprentices, this might involve diagnostic testing to ascertain tangible (and evidenced) achievement of in-programme milestones. Without a clear understanding of a learner's starting point, it is difficult to ascertain their progress in learning.

4.4 Enrolment

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Enrolment is a part of the usual on-boarding process. We do not believe that providers would expect this to become an eligible cost.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

4.5 Main provider (or subcontractor) induction

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Induction is a part of the usual on-boarding process. We do not believe that providers would expect this to become an eligible cost.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

4.6 Travel costs for apprentices

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

An apprenticeship is a job with training. It should therefore be expected that the employer, provider and apprentice have ensured that there is a viable plan for travelling to work and learning. It seems appropriate, given how variable such a cost could be, that this is not funded from within the apprenticeship funding.

b) What would be the impact of this area remaining as an ineligible cost? Are there any groups you feel are disadvantaged by this policy? Please explain your answer.

Please comment below::

c) Should we be more explicit (in future versions of the apprenticeship funding rules) that the £1,000 additional payment can be used by the employer (and / or the provider) for any purpose including apprentice travel?

Please comment below::

It would perhaps be helpful to make suggestions as to areas where this funding might be used to best effect in support of the apprentice.

4.7 Apprentice wages

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

An apprenticeship is a job first and as such it would not be appropriate for an apprentice's wages to be paid from apprenticeship funding, particularly where that apprentice is an existing member of staff.

It might be in exceptional circumstances and for particular types of learners, that wages might be subsidised or supported in some way from an alternative government source?

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

It would be expected that should wages become an eligible cost that apprenticeship numbers would increase significantly, but possibly not for the right reasons and not in a sustainable way.

4.8 PPE / clothing required by the apprentice for their job role

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

An apprenticeship is a job first. Where an employer supplies PPE and clothing for other staff members it is reasonable to assume that they would pay for these for their apprentices.

It could perhaps be argued that where an apprentice needs something solely because they are an apprentice this could be viewed differently, but it is hard to think of an instance where this might be the case?

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

4.9 Development of original teaching materials related to a new apprenticeship offer

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this. (Note that the periodic refresh of existing materials is dealt with separately, under section 5 of this consultation).

Please comment below::

This is a part of the commitment and investment that a provider makes when deciding to offer a new programme. As such the provider would expect to fund this development themselves. Where the decision to offer a new programme is jointly agreed with an employer then the provider and the employer may both consider contributing.

High quality providers will develop the generic learning material to cover the full scope of the apprenticeship standard, they should satisfy themselves that they have developed sufficient materials to prepare an apprentice, who has the appropriate entry requirements, to pass successfully through to gateway for their EPA.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

It might be that more providers would produce more speculative materials if this cost were moved to become eligible. It seems appropriate that such materials are developed at the cost of the provider.

4.10 Off-the-job training delivered only by self-directed distance learning

4.11 Any training in excess of that required to achieve the apprenticeship

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

It remains reasonable that government apprenticeship funding should be used solely for the off the job learning associated with an apprenticeship. Additional learning is just that and, as such should be funded by the employer at a level agreed between the employer and the provider.

Sometimes it is easier administratively to capture all learning (not matter how funded) within a single agreement. We believe that this should be allowed, but that it should be clear what is funded as a direct part of the apprenticeship and what is in addition to it.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

4.12 Any fees to third parties associated with a licence to practise

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

This continues to be a fair balance within an apprenticeship where a LtP is mandated (or otherwise) but the content overlaps with the content of the apprenticeship.

The same would apply for any qualification that was delivered in order to cover the apprenticeship learning/skills content. A provider might choose to follow the content of a vocational certificate because the content mirrors all/some of the apprenticeship, but the registration and certification costs would not be provided through government funding. The employer, provider and apprentice need to determine if a) the certification is wanted (on top of the content) in addition to the apprenticeship certificate and, b) who will pay for the registration, administration, assessment and certification costs. Like the delivery of additional learning this would be outside the scope of the apprenticeship funding and rules.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

If we are, as the Minister has suggested, to move towards a more Germanic system then the line between a licence to practice and an apprenticeship will become more blurred. There are already substantial qualifications that are required to meet sectoral quality bars (CQC requiring a number of staff to hold various levels of NVQ within a care setting for example). In a number of other Countries gaining the apprenticeship IS the licence to practice. If the England were to insist on a qualifications based access to work, then the policy towards LtP would need to be considered.

c) Do you think the policy and information around licences to practise is clear (e.g. are you clear on what a licence to practise is)? If no, how can this be improved (e.g. do you think there should be a definitive list of licences to practise; do you think a licence to practise should continue to be an outcome in some apprenticeship standards)? Please explain your answer.

Please comment below::

We do not feel that it is necessary to worry about LtP in isolation from the delivery of any other qualification that is not mandatory as the rules are always the same. The only variation is where the LtP is mandatory for the apprenticeship - other mandatory qualifications can use apprenticeship funding for peripheral costs whereas LTps cannot.

Perhaps it would be easier to stipulate within the Apprenticeship standard itself whether the peripheral costs of a mandated element is eligible or ineligible for funding? Then the funding rules would just need to refer to this stipulation rather than get caught up in defining LtP v other mandatory qualifications?

4.13 Any fees to awarding bodies for non-mandatory qualifications

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

We believe this is covered within the same principles that apply to any other element of delivery cost that falls outside the content of the apprenticeship standard.

If employers, providers and apprentices wish to obtain certification in addition to the apprenticeship certificate, then this should remain outside the scope of apprenticeship funding.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

c) How easy is it to separate the costs of a non-mandatory qualification into the areas that are fundable (relevant / overlapping training) and the areas that are not supported by public funding (irrelevant training and peripheral costs)? Please explain your answer.

Please comment below::

This is easy where 100% of content of the non-mandatory qualification sits inside the content of the apprenticeship. An Awarding Organisation (AO) will charge a provider for the peripheral costs, so these are always easy to identify.

When the complete content of a non-mandatory qualification contains some elements that are NOT part of the apprenticeship standard, then it would be useful if the AO could clearly identify the compatible content (and provide a percentage of coverage) so that all providers who use the qualification are aware of the different sections and can calculate their funding claim accordingly. This would need to form a part of the initial negotiation between the employer and the provider and we would expect that the employer/provider contract would make clear who was responsible for paying for that which was to be delivered but not funded through apprenticeship funding.

d) Do you think the outcomes of an apprenticeship standard (particularly the funding position of mandatory and non-mandatory qualifications) are clear? If no, how can this be improved? Please explain your answer.

Please comment below::

I think these rules are clear to those who are familiar with them.

4.14 Student membership fees

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

This would seem to be an area where the employer incentive payment could be effectively used?

The funding of student membership during the delivery of an apprenticeship for someone new to the occupation could be viewed differently from those who have been working in the sector for some time, particularly where access to the membership body will give apprentices access to further support and enrichment of their learning and work experience. Where this is the case, there is probably an argument to allow this cost to be eligible.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

During the implementation of apprenticeship standards, one of the intents was that the apprenticeship would include, where possible, access to membership of any appropriate professional body, especially where membership was seen as pre-requisite for employment in that profession. This was to ensure that the apprenticeship itself was seen as the vehicle to demonstrate full professional competence without the need for subsequent tests in addition to and separate from the apprenticeship.

It is possible that this desire is not supported by keeping the cost of student membership of such bodies as an ineligible cost? As long as professional membership is of more significance to employers than an apprenticeship certificate, the less likely it is that apprenticeships will be viewed favourably by that profession.

This type of issue is closely allied to the licence to practice qualification issue. It would perhaps be helpful to give further consideration to the current approach and its potential impact on the credibility of apprenticeship standards?

c) Do you deliver / does your apprentice receive apprenticeship training that requires student membership of a regulatory body? If so, please outline the benefits gained by the apprentice and / or the employer because of the student membership and whether the student membership should be optional. Please explain your answer.

Please comment below::

4.15 End-point assessment costs incurred by the main provider

a) Is it clear which costs associated with end-point assessment are eligible for funding, as part of the price of training, and which costs need to be separately recorded and funded as part of the price for end-point assessment? Please explain your answer.

Please comment below::

Perhaps an area of confusion is where the training provider is supporting the apprentice in preparation for their EPA. Effectively the training provider is training the apprentice to familiarise them for the EPA experience. Does this count as EPA funded activity or apprenticeship funded training activity?

There is also training that might occur post gateway. This is likely to be activity designed to reinforce learning and thus prepare the apprentice for EPA.

This would be training similar to the teaching given to students preparing to take GCSE or A levels (which is a part of the funded offer). It is not just important to hold the KSBs, but also to be familiar with and confident in, the vehicle by which you will be tested.

b) If you are a provider, do you incur any end-point assessment costs, over and above the eligible cost of administration (this includes arranging the end-point assessment and liaising with the end-point assessment organisation)? Please explain your answer.

Please comment below::

The cost of preparing the apprentices to undertake the EPA, particularly where there is significant delay between gateways and EPA.

4.16 English and maths up to level 2

4.17 Repeating the same regulated qualification where previously achieved

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

The only time where such a cost or delivery should be considered is where a significant amount of time has elapsed between the apprentice taking the original qualification, and where they have not had sufficient work/life experience to embed the knowledge and skills gained from the original qualification. If an apprentice cannot display (through initial assessment) a current, effective grasp of the KSBs contained within a mandatory element of an apprenticeship, the provider needs to refresh this learning and be funded to do so. It may well be that the apprentice does not go as far as actually sitting the assessment again. For example if an apprentice undertook GCSE maths 10 years ago and gained a C grade, but has not used a significant portion of the knowledge gained through life/work since, then they will probably need additional training to refresh this knowledge in order to successfully complete their apprenticeship. This again highlights the importance of comprehensive initial assessment.

Taking a qualification again to gain a better grade is a matter of choice, particularly when achievement of the apprenticeship should supersede the importance of that qualification.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

Apprentices who gained qualifications historically and have not managed to retain the learning could well be disadvantaged if denied access to funded refresher training.

c) Do you think the policy on obtaining copy certificates and information relating to the currency of achieved qualifications is clear? If no, what information would you like to see? Please explain your answer.

Please comment below::

4.18 Accommodation costs where the apprentice is away from their home base

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Yes.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

4.19 Capital purchases including lease agreements

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

If technology is to replace paper-based learning materials, then this particular area may well need revisiting. If a provider were to supply an apprentice with a personal tablet and dongle to allow them access to learning materials and to communicate with their tutor is this not a modern equivalent to supplying a text book? Where small items are purchased with the sole intent of allowing the apprentice to access their learning, this feels like a legitimate eligible expense.

Capital investments that are made to enhance the delivery of the overall programme should remain out of scope of apprenticeship funding which continues to sit at an individual level.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

Where the item is for the use of an individual apprentice, not being able to fund its purchase through apprenticeship funding might discourage providers from embracing the use of technology in delivery and on-programme assessment.

c) Do you think we are clear on what we consider to be 'capital'? Please explain your answer.

Please comment below::

If within capital you are NOT including personal and/or remote internet access devices, this needs to be made clear.

4.20 Maintenance of capital purchases

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

There might be an argument for the funding of repairs and maintenance of personal devices to be eligible?

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

4.21 Time spent by managers supporting or mentoring apprentices (non-training time)

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Time spent supporting an apprentice in directly achieving their apprenticeship needs to be clearly differentiated from support activity that would naturally occur with any employee.

As a part of the initial negotiation between the employer and the provider, there needs to be some level of agreement as to how much time the employer is prepared to commit to providing employer staff support to the apprentice that will be focussed on support for the apprenticeship. Where such support directly contributes to the 20% off the job training element, then this should be recognised within the contract.

The provision of mentoring and apprentice support that occurs within the on the job portion of the apprenticeship is a part of the employer's commitment to the apprentice and is currently out of scope for funding. It could well be argued that each new employee should be provided with on the job support by their employer.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

4.22 Recruitment / CPD of staff involved in apprenticeships

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

CPD for delivery staff is a part of the providers on-going commitment to the delivery of an apprenticeship standard. As such a provider should expect to meet the cost of this activity from outside the apprenticeship funding.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

4.23 Company inductions

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Induction may vary slightly for an apprentice employee, but all employees receive some form of induction on joining a company.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

4.24 Managing agents

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Yes. Generally we do not support or condone the for profit activities sometimes referred to as 'brokerage'. We do however recognise the usefulness of some, well placed organisations to provide a level of matching between levy to non-levy employers and apprentices to employers. We feel that is important to ensure that

a commercial market in this activity is NOT allowed to develop as this can only reduce the focus of funding on high quality training delivery.

Using a third party to manage some elements of a contract is suggestive of subcontracting and could be subject to the existing subcontracting rules?

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

4.25 Brokers / referral services

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Yes. Generally we do not support or condone the for profit activities sometimes referred to as 'brokerage'. We do however recognise the usefulness of some, well placed organisations to provide a level of matching between levy to non-levy employers and apprentices to employers or providers. We feel that it is important to ensure that a commercial market in this activity is NOT allowed to develop as this can only reduce the focus of funding on high quality training delivery.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

4.26 The costs of memberships or other costs to secure business

a) Do you agree that the party identified should fund this activity? If no, please indicate who should fund this activity in future (where it is required) and your reason for this.

Please comment below::

Yes. This is a part of a provider's marketing strategy and would not normally be expected to be funded.

b) What would be the impact of this area remaining as an ineligible cost? Please explain your answer.

Please comment below::

4.27 Inducements

a) Is there anything we need to do to make our position on inducements clearer? Please explain your answer.

Please comment below::

We believe that this policy approach is clear.

5 A review of other costs

5.1 Overview

5.2 Marketing

Please indicate who should fund this activity (where it is required) and your reason for this.

Please comment below::

The training provider should fund their own promotional costs. Where a provider decides to spend a significant amount in such activities, they should not be able to recoup this expenditure through subsequent apprenticeship funding directly.

It is unfortunate that such promotion can be undertaken by weak providers just as readily as strong ones and that the employer market may well mis-interpret effective marketing techniques and large financial commitment to such, with the ability to deliver a high-quality, effective and responsive apprenticeship offer. It is to be hoped that where a provider appears to be using apprenticeship funding to support such marketing activities, the funding agency will act.

5.3 IAG delivery to apprentices

a) Please indicate who should fund this activity (where it is required) and your reason for this.

Please comment below::

We would love to see an insistence on the provision of independently scrutinised Advice and Guidance at the beginning of an apprenticeship programme, during it and towards the end. The apprenticeship is NOT the destination of the apprentice and so the apprentice will need support to determine what they will do to consolidate their learning and experience and to develop a career plan. Particularly those on entry level programmes.

Like most things, what constitutes 'effective IAG' is open to interpretation from giving out a pamphlet to an in-depth support interview process. If IAG were to become a funded element of an apprenticeship, it is important that it is made clear what is expected.

5.4 Learner recruitment / sales team

a) Please indicate who should fund this activity (where it is required) and your reason for this.

Please comment below::

This would be a provider's choice and a part of their marketing activity, as such we would not expect this to be eligible for apprenticeship funding.

5.5 Employer recruitment / sales team

a) Please indicate who should fund this activity (where it is required) and your reason for this.

Please comment below::

This would be a provider's choice and a part of their marketing activity, as such we would not expect this to be eligible for apprenticeship funding.

5.6 Apprenticeship Training Agency fees

a) Please indicate who should fund this activity (where it is required) and your reason for this.

Please comment below:

We feel that this is appropriate, particularly as the payment covers the apprentices wages which are an ineligible cost.

5.7 Other overheads (not related to off-the-job training delivery)

a) Please indicate who should fund this activity (where it is required) and your reason for this.

Please comment below::

When costing the use of a room or a member of staff for use within a programme it would be usual to include an element of on-costs. This would not fund the full cost of general upkeep and maintenance, but would contribute a small amount towards it in recognition of the inherent need to keep the building/staff member(!) in a fit state to provide the service required at the time that it is required.

We feel the differentiation made is adequate here.

5.8 The creation of line manager resources

a) Please indicate who should fund this activity (where it is required) and your reason for this.

Please comment below::

Assuming this refers to the apprentices' line manager? High quality providers will offer separate training for line managers of apprentices where this is needed. This may be funded through alternate sources, or the provider might feel direct investment is worthwhile. It is important that all those with a role to play in support of an apprentice understand that role, but it would not be expected that apprenticeship funding be used to achieve this understanding.

5.9 Prevent / safeguarding agenda

a) Please indicate who should fund this activity and your reason for this.

Please comment below::

Where such delivery is required in the apprentices' work and could be argued to be an inherent part of the apprenticeship standard's content, then this activity should be funded by apprenticeship funding.

Where it is delivered as a part of provider or employer general induction then the cost would remain ineligible, as does the rest of the content of induction in either instance.

5.10 Mock tests (including end-point assessment)

a) Please indicate who should fund this activity (where it is required) and your reason for this.

Please comment below::

We feel that there is an argument to be made for the inclusion of this cost either within the apprenticeship training funding or within the EPA funding.

EPA is a part of the apprenticeship process, a candidate cannot be successful without effectively completing the EPA. Whilst an EPA makes every effort to reflect the work that the standard encompasses, by its very nature it is different and candidates need to be prepared to deal with this difference. It could therefore be argued that training is required in order for an apprentice to be successful. If an apprentice can 'wield a hammer' effectively in work, but is incapable of describing how they do this in a professional interview then they will fail.

5.11 Post-gateway activity

a) Please indicate who should fund this activity (where it is required) and your reason for this.

Please comment below::

This activity would seem better funded through the EPA funding as it would be intended to keep the apprentice on track to undertake their EPA.

The relationship and responsibilities that sit with the training provider and the EPA provider become quite cloudy in this area and perhaps it would be helpful to further consider this point, especially given the current economic climate resulting from Covid-19.

5.12 Periodic refresh of existing learning materials

a) Please indicate who should fund this activity (where it is required) and your reason for this.

Please comment below::

A provider who is committed to the delivery of a specific standard will expect to update materials in the light of experience and change after/during every cohort. High quality providers continually assess their effectiveness in delivery and expect to do this as a part of 'business as usual'.

b) How often would a 'periodic refresh of existing training materials' take place and how involved is this (e.g. how long would it typically take and what are the costs involved)? Please explain your answer.

Please comment below::

Every high quality provider will undertake an annual Self Assessment Report process at subject level that will be broken down into delivery areas. Within this document they will identify the cycle of review that has been undertaken throughout the year designed to ensure the development and improvement to delivery in the light of experience and external (and internal) change. Ofsted expect this. This means that learning materials are (or should be) under constant review. A delivery team will meet regularly and could update learning materials every time or rarely depending on a range of variables.

This is a part of the on-going 'business as usual' quality improvement cycle for a high quality provider. As such this area is governed more by Ofsted than the apprenticeship funding rules.

5.13 Any other cost not covered by this review

a) What other cost areas should be considered in our review of eligible and ineligible costs? Please describe the cost in full (giving examples where appropriate) and indicate who should fund this activity and why. Please explain your answer.

Please comment below::

There remain quite a number of activities that are inherently important to the successful delivery of apprenticeship training that remain ineligible for funding as they cannot be effectively ascribed to an individual learner. Where a provider's sole income is from apprenticeship provision, these costs would have to met from elsewhere - but where? An employer will not pay for the development of generic materials or the purchase of a software programme to support on-going assessment for example, but ultimately they must be paid for or apprenticeship delivery is not sustainable. Funding levels need to allow for coverage of these costs (in a similar way that each hour of learning has an on-cost attached that recognises the need to cover all the overall expenditure that keeps the room warm, bright, etc). It is unrealistic to fund just the costs that can be directly attached to a specific learner and expect the quite considerable general costs to come from 'elsewhere' when there isn't an 'elsewhere'.