



LWBLA Working Response to the Government Consultation of the Richard Review

1: How can we ensure that every Apprenticeship delivers substantial new skills?

The London Work Based Learning Alliance (LWBLA) is an unambiguous advocate that all Apprenticeships should involve substantial skill acquisition that is appropriate to the level and type of qualification being undertaken.

The LWBLA believes that the most effective way to realise the Government's vision is to have industry led standards and qualifications defined in close partnership employers and the supply side providers who deliver work based learning, as well as utilising expertise to be found in other organisations such as Awarding Bodies.

Contextually the LWBLA considers an Apprentice must always be:

- an employee in a place of work, within a recognised industry or business setting,
- that the employer should have a central role in all aspects of the process,
- critically the key focus for apprenticeship training is in the work place, and
- that the principle of competence by assessment drives the validity of all 'on the job training' and in situ qualification delivery.

We believe that 'skill acquisition' should be seen as a necessary requirement for individuals to:

- Secure a job and develop a career,
- Generate enhanced employment prospects, and
- Open up opportunities to progress into professional status.

Skill acquisition is most effectively defined and delivered where there is a clear understanding of the relationship between the job, the capability of the individual, and how the qualification demonstrates competency of the person undertaking the job role. The key points are set out below:

- job content should drive the level of skill required to be competent and fully effective in the role,
- the needs and capability of the individual to attain the level of learning required should be fully recognised in determining how best to deliver learning and skill acquisition,
- the 'on the job' and 'off the job' qualifications should maximise the value of skill acquisition, and



- the most cost and time efficient delivery model should be agreed collaboratively between the employer and training provider.

The LWBLA has identified the following primary risks:

- that the Government inadvertently makes the new Apprenticeship standard and qualifications over complex, inflexible and difficult to deliver. The unintended outcome of the Richard Review must not be a contraction of volume and a narrowing of opportunity for the employer and individual.
- the Government adopts too narrow a definition of 'substantive' skill acquisition. Ultimately if employers are to own the system they should define and control what is, and what isn't an Apprenticeship, and the level of skill acquisition required for each level that the standard and qualification can apply to.

The critical consideration is how the specification of skill acquisition and learning is to be organised and delivered with the minimum risk of failure, and maximum opportunity for the employer and employee to secure mutual benefit and return. It is of little value to create a system of defining Apprenticeships that is unrealisable, or present the possibility of an unacceptably high risk of non completion or low outcomes.

The LWBLA believes that an over restrictive approach to defining terms will simply lead to long term decline in volume and take up, precisely at a time when the Government is keen to promote and expand the apprenticeship offer.

The Government needs agents of change such as employers on the demand side and providers on the supply side if it wants to affect a successful long term paradigm shift in the value, take up and return of apprenticeships.

The central issue we believe is how to secure the required buy-in from an employer to engage and be accountable in all aspects of the process - from job design & content, recruitment practises and recognition that the qualifications required to do the job well are of a sufficiently rigorous and valued

The LWBLA agrees that qualitative improvement should be made to the Apprenticeship framework. But the broader more contextualised issue is how to recognise and validate different models of learning delivery and the transfer value of the apprenticeship when an employee changes job or moves to a new employer. In London SME's discussed with the LWBLA the problem of comparing in-house employer delivered apprenticeship training with an industry wide qualification: for instance tension can exist between in-house training that exclusively meets the organisations requirements, and the external recognition and validation of the qualifications for that occupation and industry when a person moves between employers. This will be key test of how the new standards and qualifications can cope with the reality of staff turnover and the effective functioning of the labour market.

The LWBLA would like to see the immediate focus for Government policy in responding to the Richard Review to be on developing Apprenticeship pathways at higher levels, and creating ladders of opportunity into professional status. This is



where the Government could have greatest impact in realising its future vision for Apprenticeships based on 'substantial skill acquisition' as the defining characteristic for all future work based learning in England.

The LWBLA believes that maximising the delivery of substantial skills acquisition can be best achieved by using public expenditure directly under contract either to a large employer, or a training provider. This would be the best way to secure a national apprenticeship programme that is of sufficient scale, reach, content, quality, and value.

For the reasons set out above the LWBLA believes that the Government should take necessary time to plan ahead, galvanise a sufficient broad range of support particularly across industry and business, ensure providers have a leading voice in designing new standards. The LWBLA believes that the Government should not commit to radical change before 2015.

Question 2: How should we invite and enable employers to come together to design new standards for Apprenticeships?

This should be by open invitation defined by industrial sectors and occupational groupings. The Government should promote self organisation and self regulation for employers and not impose a preset model for how employers and industries must organise themselves. This may or may not involve the Sector Skills councils and the process should be championed by employers in each occupational/industrial sector utilising a generic framework with specific criteria agreed by Government.

The LWBLA requests that the Government establish a high level committee comprised of key stakeholders such as employers - large and small, providers and experts in the delivery of apprenticeships and qualifications including Universities, and awarding bodies to have strategic oversight for the design of the new standards. This is critical to ensure 'buy in' and focus in addressing system design, complexity, testing and occupational comparables as part of building a robust long term policy response.

The Government should publish a strategic framework that allows employers, employer representative bodies and providers to see how the new standards should be organised so that different industries follow a similar or comparable process in establishing these new standards.

This new strategic framework should be sufficiently flexible or broadly defined to address the requirements of both large employers and SME's, otherwise the risk of a 'one size fit all' model will emerge which is not viewed by the LWBLA as an effective template for reflecting the diverse needs of employment based industrially specific occupational learning.

A key point of clarification is to know how many 'industries' are required for the purposes of covering the UK labour force? Will the industries in-turn have sub classifications such as in engineering there exists electrical, rail, mechanical etc. and



where will the balance be struck between the desire to be able to offer specialised knowledge and learning and generalised competencies and functional capability in the workplace?

Currently we know that:

- Different industries adopt different standards for equivalent level qualifications.
- different employers within the same industry adopt different standards of content and measurement, and
- Over time qualifications can assume different values - 'use' as well as 'esteem' value in the eyes of the employer and individual with variable economic returns.

The LWBLA would highlight the following issues:

- The new standards should only be agreed following extensive testing and evaluation in close partnership with leading Training Providers, curriculum experts and Awarding Bodies. The risk of implementing untested and unproven delivery models in occupational learning should be avoided.
- What currently works well and is well regarded by both employers and industry groups and providers should be retained.
- The Government should make the point at all stages of the policy process that it values and encourages the role of training providers in supporting the design of the new standards. Awarding Bodies also have a critical input to curriculum and qualification design.

The policy key issue for the LWBLA to consider over the forthcoming months is how the 'employer designed industry standards' should be defined and the qualifications agreed.

The LWBLA believes that the most effective way to define an industry standard is to focus on:

- the place of work,
- the requirements of the job and the need for skill acquisition 'on the job', and
- 'off the job' underpinning theory and knowledge, and
- Applied testing and validating of both on the job and off the job through rigorous assessment and verification.

We agree with the current approach by Government that apprenticeships should be available to all businesses/employers irrespective of location, size or industry and to individual of all ages – and recognised as a progressive 'ladder of opportunity with the potential to attain 'professional status'.

The main drive for government policy over the next three years should be to open up apprenticeships as a credible and viable route into higher levels of education and training with professional status.



Question 3: What are your views on the proposed criteria for Apprenticeship standards as set in section 2 of the document?

Whatever criteria the Government finally agrees upon the LWBLA would expect consistency of treatment and equity of content between all occupations and sectors for all apprenticeships. We would want to avoid perceptions from employers, providers and individuals that one apprenticeship is easier/harder to achieve than another.

Apprenticeships should not be marketed or perceived negatively by the public as 'reward for failure at school' but as valued and valuable career opportunities and pathways.

Until each of the category/criteria is set out in detail it is not possible to fully endorse/reject the criteria. Our response to the criteria is provisionally as follows:

- Stretching – yes, covering both occupational and generic skill acquisition and demonstrably reflect different levels of qualifications particularly above Level 3.
- Transferable – yes, and reflect the need to combine occupational and generic skills such as communication, team work etc... within the occupational subject or industry sector.
- Buy in – yes, but the key issue is having sufficient acceptance that where employers want to have a qualification that is unique to that Employer it can secure industry recognition. A 'one size fit all' approach may have the unintended outcome of undermining the customisation and delivery of occupational learning in the workplace.
- Substantial training - should reflect the job role, ob content and the employer's judgment on productive capability. This may vary between employers and the role of the provider will be to ensure a measure of consistency and that standards are met.
- Supporting skill acquisition beyond the current job is a highly subjective and sensitive issue as the employer may be wary of 'over training' that inadvertently leads to poaching and higher staff turnover rates as a consequence.

The LWBLA would support providers piloting in London different methodologies, models and comparable testing in specific occupations to evaluate how the new criteria operates in practise.

Question 4: Should there be only one standard per Apprentice occupation/ job role?

Yes - the LWBLA agrees that a single standard should be established but would prefer retaining a market in qualifications to test against it. This would encourage innovation and efficient delivery models to develop and reflect customer choice across different industries.

Again as per earlier questions the LWBLA is concerned that a 'one size fit all' approach would exclude employers particularly SME's who employ an overwhelming majority of apprentices in London.



Question 5: Should there be only one qualification per standard?

Unless there is a broad approach to developing the core and options within the new standards and qualifications we do not believe that there should be one qualification per standard. The perceived risk of excluding employers who judge a single qualification to be inappropriate in meeting their specific needs would be counterproductive to the Government's stated aims and objectives.

The LWBLA consultation process revealed a significant variety of opinion and response to this question. Specifically, it is not obvious to the LWBLA how the Government differentiates between a new 'standard' and an existing 'framework' – how do they differ and what impact does this have on the qualifications that are required on an occupational industry basis and the level of learning to be met by the employer and individual?

If frameworks are unused the Government should invite the relevant industry grouping to recommend to Government whether such frameworks should continue or not. Government should resist the temptation to pre-empt industry or business opinion in this way.

Question 6: How should we manage the transition from the current system of Apprenticeship frameworks to a new system of employer-designed Apprenticeship standards and qualifications?

The Government should publish a strategic framework which sets out a critical path and timescale over a five year period to manage the transition.

The LWBLA advocates that the new standards and qualifications there should be subject to a four stage process of:

- commissioning,
- establishment,
- monitoring and
- review.

The LWBLA believes that a mix of providers, awarding bodies overseen by Ofqual should sit alongside employers and have active roles in all aspects of the 'standards' setting process

Question 7: How can we make sure that the new standards stay relevant to employers, and are not compromised over time?

The LWBLA believes that all interested stakeholders including providers should have an active relationship with employers to oversee, monitor and review the new standards. Ofqual should set out strategic guidance for all industry /occupational



groups to judge the validity and credibility of the standard and qualifications – this will ensure consistency of approach and allow for comparable analysis to be validated.

Government should fund each industry/sector to commission an independent evaluation of employer, learner and provider attitudes biannually so that a qualitative picture of the standards can be built up. Where modifications are required to maintain the value of the standard then this should be achieved as a result of a robust and transparent process overseen by Ofqual.

Question 8: How can we ensure that employers are better engaged with the development and oversight of the assessment in Apprenticeships?

The LWBLA endorses the Governments view that employers should have a more direct role in the final assessment of the apprenticeship. We also agree that that the role of the Assessor and Verifier have a critical professional input throughout the process of delivering objective assessments of competency in the work place. Employers should use examples of what works well and is respected as a template for specific industries and sectors.

The LWBLA would highlight the example of the hairdressing and beautician industry below to reflect on the way that employers and providers actively collaborate to uphold standards and design assessment practise:

“Habia is the Hairdressing and Beauty Industry Authority and is a SSC as part of Skills Active. I have for many years chaired the Hairdressing Forum (full title - Hair, Barbering and African Caribbean Industry Forum)which sets the training standards for Hairdressing and Barbering, which essentially form the basis of NVQs level 1, 2 and 3 and agree the content of the apprenticeship frameworks.

Anyone in the industry can ask to come to the meetings and currently we have representatives from Colleges, Providers, Manufacturers (L’Oreal and Goldwell), and large salon groups through to a single salon owner (including barbers and Caucasian and African Caribbean hairdressers), freelance hairdressers, Vidal Sassoon. I would say that about 50% are employers. This means that the employers have their fair input and say.

The Forum appoints an ‘expert working group’ that puts the wishes of the forum into the practical units and then reports back to the Forum. This process is currently taking place for new standards to come into being in 2014. The expert working group has a more grass roots make-up with day-to-day practitioners from across the industry.”

David Wada, Council member and Chair of the Hairdressing Forum and LWBLA member.



Question 9: How could employer's best be involved in the practical delivery of assessment?

The key principle is that the employer should have the freedom to choose how they want to be involved in the assessment process.

This should be a transparent process and not one that takes place in the employers 'name'. Either the employer delivers the assessment directly themselves as in the case of many large corporate employers, or they buy in the expertise from a training provider and it is the provider's responsibility to deliver the assessment.

It is critical to recognise the limitations SME's often have to directly provide sound and robust assessment, and so the role of the training provider is often paramount to delivering effective assessment throughout the apprenticeship. The training provider also plays a critical role in guiding and supporting the employer to make the correct decisions on the learning plan and qualifications to be undertaken.

The LWBLA sees a three step milestone review process for the employer; at the outset, at mid point and critically at the end point of the apprenticeship. Training providers who have achieved a grade 1 or 2 at their most recent Ofsted inspection will have sound systems, processes and benchmarks for upholding high performing assessment practice and standards.

Question 10: How can the independence and consistency of assessment in Apprenticeships be further improved?

The LWBLA endorses the approach taken in the review that assessment practice should be independent, consistent and recognised as upholders of standards. There are a variety of models and good practice with providers in London, and the LWBLA sees the role of the Assessor as continuing to engage in a collaborative and effective relationship with the employer.

The Assessor also has an important relationship as a 'critical friend' of the apprentice, mentoring and encouraging where appropriate and offering advice to maintain progress and compliance with the standards.

The role of the Internal Verifier and the quality assurance arrangements of the Awarding Body, important checks and balances in the evidencing, portfolio building and assessment process.

Question 11: How should we implement end point assessment for Apprenticeships?

End point assessment should be undertaken collaboratively between the employer, and training provider. The verification process is critical and role of the internal verifier should be central to the agreed process.



The outcome should be a written report signed off by the Apprentice, employer and provider.

The testing process should be defined by the employer conforming to the industry standard in close collaboration with the training provider who delivers the on the job training. This should be flexible to cope with the needs of small SME's and large corporate employers irrespective of industry or location.

Question 12: How should we implement grading for Apprenticeship qualifications?

The view of providers consulted by the LWBLA revealed that when measuring competence in the work place this should be a straightforward pass/fail.

Where all 'off the job' training is accredited under the new standard and qualification then a pass grade system should be in place with a distinction for the very highest performing Apprentice, particularly at Level 4 and above.

Any grading system should be applied consistently and systematically across all sectors - if this cannot be achieved then the Government should not pursue this issue as it may become inadvertently divisive.

Question 13: What are the specific obstacles to all Apprentices achieving level 2 English and maths in their Apprenticeship, and how could these be overcome?

The LWBLA view is that English and Maths should sit outside of the qualifications contained within the Apprenticeship standard. The functional skills model of delivering literacy and numeracy should be incorporated within the requirements of the 'on the job' training.

The LWBLA consulted employers many of whom are SME's who responded that they did not see it as their role to offer remedial education or play 'catch up' after 11 years of class room based state education.

Both the LWBLA and employers concluded that English and Maths should be a requirement for all 16-24 year olds to achieve a level 2 or C grade equivalent at GCSE but these should be standalone qualifications that sit outside of the apprenticeship framework/standard.

Question 14: How would a requirement to have all Apprentices achieve level 2 in English and Maths impact on employers, providers and potential learners? What are the risks and potential solutions?

The primary risk is that employers will not employ Apprentices as they see the inclusion of English and Maths at level 2 (for a Level 2 framework/standard) as a barrier to recruiting and retaining staff. For individuals and providers the risk of successfully



achieving the qualifications will either screen out occupationally suitable individuals given the performance management culture attached to public funding and Ofsted inspections that in-turn makes the Apprenticeship programme overly restrictive and profoundly risk averse.

Individuals aged over 23 who wish to pursue an apprenticeship with an employer will only choose to pay for the 'on the job' and 'off the job' training thus avoiding the English and maths. This may lead to a decline in the take up of adult apprenticeships which is not what Government policy aims to do.

Question15: What further steps, by government or others, could encourage greater diversity and innovation in training delivery to help Apprentices reach the standards that employers have set?

There are a number of points that the LWBLA would wish to discuss with Government at a strategic and practical level in addressing how to promote greater diversity in innovation that directly leads to better overall performance, quality and customer satisfaction..

The key step in the LWBLA's view is that the Government in taking the Richard Review forward should commit strategically to give equal weight to developing and supporting an innovative supply side, as it does to encourage employers to generate the demand for apprenticeships.

In part this is a commentary on the market conditions under which providers operate (often with significant variations in defined labour markets and spatial areas); but it is also a reflection of the impact regulation and policy prescription has in either encouraging or stifling innovation and supporting employers.

The experience in London of a highly active and competitive marketplace with relatively low barriers

of entry, with evidence of sophisticated supply chains and subcontracting, has in our view acted as a key driver in increasing both overall apprenticeship volume, performance, and quality of service to both employer and individual. In 2011-2 over 80% of all Apprentices' in London now receive their training and qualifications from an independent provider.

A thriving and competitive market stimulates a permanent condition for innovation, diversity and cost control to drive the service offer to employers. Too many counties and regions in England do not have a competitive supply side market and in many cases large Colleges of Further Education dominate as public monopolies of service creating high barriers of entry and preventing new suppliers from entering the market.

In London the role of an independent trade association to represent providers has proved to be a catalyst for encouraging and developing strategic and operational capability across the supply side with a focus on both qualitative and quantitative improvement.



A key point that would drive further innovation is that all the large employers who hold direct contracts with Government should openly procure training delivery from a government approved procurement portal so that there is transparency and value in the use of public funds. This would be seen as a clear commitment to the sourcing of innovative and high performing delivery models.

In respect of higher level apprenticeship is critically important that Government encourages Universities to become active and fully committed parties to supporting Apprenticeships, working with employers and developing credible pathways for progression into academic qualifications or equivalent work based qualifications that led to lead directly to professional status.

Support for SME's varies greatly across England , and the work of the London Mayor in promoting apprenticeships, providing greater incentive for SME's to recruit apprentices should be trialled across all major urban and industrial areas in England.

A key point is signposting of services and offers; evidence from our discussion with employers is that the government creates competing offers between different Government departments. Typically local public agencies operate independently of one another even though they are targeting the same client or customer groups. The LWBLA believes the Government should promote through the new LEP's a single unified offer to SMEs of all government initiatives including apprenticeships. This should have a broader remit than just apprenticeships.

Finally the LWBLA actively supports the introduction of traineeships as a complementary and important step for engaging both individuals aged 16-24 to gain work experience and progression into employment preferable as an apprentice.

Question 16: What approach would work best to ensure Apprentices benefit from time to train and reflect away from their day to day workplace?

The key point for all off the job or 'away from day to day workplace' training is that this is by mutual agreement with the employer and provider as part of the overall learning plan. That the apprentice irrespective of the employer, industry, or location should not have undue restrictions placed on the apprentice taking part in 'off the job' training. This can be a critical issue for many SME's and so the opportunity to utilise online learning should be exploited and e- learning pilot programmes tested using awarding bodies and providers. All apprenticeships up to and including level 3 employed in an SME should have options that allow for off the job triaging only where the employer has agreed that this will not detrimentally affect the businesses operations.

For higher level apprenticeships in particular off the job training should be viewed as a critical and mandatory component of the overall apprenticeship framework/ standard.



Question 17: Should off-site learning be made mandatory?

No not mandatory - but employers should encourage off site learning and apprentices should see off site learning as gaining a broader understanding of the industry/sector or job role.

Question 18: How can the process for approving training providers be improved, to help employers find high quality, relevant training?

The LWBLA believes that information should be open, transparent and easily accessible by the customer, Government and providers. That criteria should be consistently applied to all providers including employers where they hold contracts with Government irrespective of size or status, and

There are three key points that the LWBLA would highlight in the drive to source high quality training for employers:

- An open register of all training provider and subcontractors delivering apprenticeships in England.
- A standard annual statistical and qualitative report for each provider

The LWBLA believes that the government should maintain (as it does now) a single only register for all training providers who want to be approved to deliver apprenticeship training and qualifications irrespective of funding agency.

The government should secure the support of the both the Aoc and independent provided providers and publish an annual report of statistical evidence highlighting performance and standards.

The most significant and valued measure of judging quality are the grades received in an Ofsted Inspection report. The LWBLA supports the Governments approach that when new initiatives are launched those only providers who achieved an overall grade 1 or 2 in the first instance should deliver these programmes. Grade 2 should be the benchmark of quality that all providers are expected to attain.

Question 19: Do you believe that a kite marking scheme for your sector or profession would add value and be supported?

Yes - in theory a 'kite mark' could add value, but there is a difficult history of Government inventing kite marks that have not stood the test of time.

The current consultation on Charter status has revealed deep differences of view amongst providers in London. Namely that any provider appears to be able to obtain this status by employing a consultant to write the proposal, and the emphasis on supporting FE and Community Colleges is viewed as discriminatory.



The most readily understood and recognised test of quality assurance is an Ofsted inspection report. Ofsted has stood the test of time and its grades are viewed by customer, Government and the provider base as an objective and validated set of graded results.

Question 20: What more can government do to facilitate effective third party/ external use of its data to better inform individuals and employers about Apprenticeships?

The LWBLA believes in open and transparent information to be made available to the general public on all aspects of education and training in receipt of public funds.

The Government should encourage and support FE Colleges and independent provided providers to agree a format for the publication of a standard annual report of statistical evidence highlighting key performance, standards and trends. This should be held online and be readily and easily accessible to the public.

The Government should pilot in FE Colleges customer reviews and star ratings as witnessed in many commercial offerings such as travel, books etc. The validation of the customer experience is a concept that should be considered, tested and evaluated to form a conclusion as to whether it can be safely applied into all aspects of employer facing training.

Question 21: What approaches are effective to inform young people and their parents about the opportunities provided by an Apprenticeship?

In the LWBLA's view the current arrangements for the provision of impartial information to young people and parents in London is inadequate. In a school setting Head Teachers in London often act as critical 'gate keepers' in judging what can and won't be allowed to be offered in schools and other education establishments. Many apprenticeship providers see this as preventing young people and parents from accessing impartial information and advice on the apprenticeship offer. Head teachers also adopt 'tokenistic' strategies of allowing information to be presented on apprenticeship as a reward for failure at school, and not as an alternative career path.

Set against the back drop of a dramatic decline in the careers services in London the LWBLA established the Apprenticeship Information Ambassador pilot project in 2012. This is a pan London project that uses experts in the form of leading Apprenticeship providers and has seen rapid expansion and take up across all 32 London Boroughs. The Ambassador 'brand' has become widely trusted and popular as it carries a high level of credibility and value given the stringent quality criteria used to determine membership of the service. All of the criteria have to be met to be eligible to join; the main features are the following:

Holding an SFA contract to deliver apprenticeships; the most recent Ofsted inspection must have a grade 1 or 2 for the 'overall effectiveness of provision'; above MPL



performance levels, taking up 2 references; be Matrix accredited or having a date for accreditation, and using enhanced CRB checks for all learner facing staff.

Question 22: How can we support employers to engage with learners of all ages to provide information about Apprenticeship opportunities?

The strategic problem is that employers do not see it as their job to fill the vacuum caused by the decline of the careers service nationally or locally. The role of the NAS website and its Av service should be opened up to allow employers to advertise and promote more than existing vacancies and be a vehicle for careers information, qualifications and progression routes. Apprenticeships should be part of the Ucas website with clear signposting and links to professional bodies and chartered institutes.

The Institute of Personnel Management should be encouraged through sponsorship by NAS and the National Careers service to be a focal point for advice and guidance on the employment and training of an apprentice for HR professionals and employers more widely.

Employer representative organisations such as Chambers of Commerce in partnership with provider Associations should jointly collaborate in designing and offering Nas approved materials and literature on a local and regional basis.

Employers are proactive where they want to promote either for PR purposes or recruit staff through the employment of apprenticeships. Whilst this is the main a good opportunity for large corporate employers, it is often a difficult activity for SME's to commit to and there are significant differences of engagement for employers in specific industry sectors.

The LWBLA believes the national careers service has the potential to work closely with employers to provide up to date information. In London it should be noted that the local careers services within Boroughs has largely collapsed. The only organised and structured offer to provide young people with information of apprenticeships is the Apprenticeship Information Ambassador Network that operates across Greater London.

Question 23: Do you consider that the proposals set out in this document would have a positive or negative impact on any group, including those with protected characteristics? Please provide any comments or evidence you have for your answer and set out which aspects of the reforms will impact and how these impacts might be managed.

LWBLA believes that using tax incentives to fund a national apprenticeship programme would leave Government totally reliant on business sentiment and the economic cycle to meet its national strategic priorities in a policy area that has been historically difficult to stimulate demand. Indirectly it would also become very difficult for



Government to secure objective measures of comparable impact when work based learning is compared to all other forms of (highly regulated) education and qualification delivery.

The poor take up of employer grants in London throughout 2012 and 2013 is evidence of a key strategic weakness (in London,) namely a lack of sufficient demand from employers to employ apprentices.

Question 24: Do you have any further comments on the issues in this consultation?

The key strategic issue that the LWBLA believe would make a transformative improvement to the status, take up and esteem value of Apprenticeships in England would be to establish a Royal Society of Apprenticeships to oversee all aspects of publicly and privately funded apprenticeships in the UK. The Government should consider this actively and bring forward proposal to publicly consult on such a proposal in the next 12 months.