# Annex 2: Consultation on preventing misuse of the term 'apprenticeships' in relation to unauthorised training response form

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is 19/08/2015

Please return completed forms to:

Apprenticeships Unit
Department of Business, Innovation and Skills
2nd Floor,
1 Victoria Street,
London,
SW1H 0ET

## apprenticeshipslegislation@bis.gsi.gov.uk

Please tick the box below that best described you as a respondent to this consultation:

|   | Business representative organisation/trade body |
|---|---|
|   | Central government                              |
|   | Charity or social enterprise                    |
|   | Individual                                      |
|   | Large business (over 250 staff)                 |
|   | Legal representative                            |
|   | Local Government                                |
|   | Medium business (50 to 250 staff)               |
|   | Micro business (up to 9 staff)                  |
|   | Small business (10 to 49 staff)                 |
|   | Trade union or staff association                |
| x | Other (Student representative organisation      |
|   | )   |

Question 1: Are you aware of any instances of the term 'apprenticeship' being used to advertise courses other than apprenticeships eligible for Government funding?

Yes

Question 2: If 'yes', please provide any additional detail of such instances that might be relevant, particularly if it can help to indicate the scale of the issue.

Comments:

Ben to fill in

Question 3: Are there any unintended consequences that may arise as a result of this proposal?

Yes

Question 4: If 'yes', please provide details of what unintended consequences there may be?

Comments:

Employer Exemption

NUS believes that continuing to allow employers to run their own funded training programmes with the title 'apprenticeship' will only serve to create confusion for apprentices, parents and the public.

If, as the Government wishes, apprenticeships are to attain the same protected status as other qualifications such as degrees, it is important to ensure that there is no ambiguity whatsoever about what does and does not constitute an apprenticeship. We advise that the Government looks to Germany, where apprenticeships are fully protected and held in high esteem.

By ensuring that employers' self-funded 'apprenticeships' are rebadged, the measures could ensure that apprenticeships are fully protected and have a base upon which to work towards developing future quality assurance measures and information for prospective apprentices. We do not believe that this would be a major burden to employers.

#### Enforcement

NUS are concerned about the plans for 'light-touch' enforcement of any new measures, and in particular would like to see serial-offenders tackled for forcefully, again to eliminate any possibility of confusion for prospective apprentices, parents, and the general public.

### Classroom-based education

NUS also urges the government to consider protection of the status and funding of classroom-based vocational education and training (VET). Whilst the expansion of apprenticeship opportunities is a welcome policy goal, classroom-based VET is still necessary to ensure that prospective learners have a full range of choices to suit their needs, particular adult learners, parents, carers and others who may not have the time for full-time work.

# Do you have any other comments that might aid the consultation process as a whole?

Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.

#### Comments:

NUS welcomes the broad direction of the plan to ensure the term 'apprenticeship' is properly protected. We believe this is essential to ensuring apprentices are properly protected and informed when making choices about their education and training.

NUS believes that the introduction of these new measures will have to be properly integrated into careers information, advice and guidance (IAG). Prospective apprentices should be aware of does and does not constitute an apprenticeship.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply  $\boxtimes$