



## **Written Submission to the Apprenticeship Action Plan 2021-2025 Consultation Paper**

**September 2020**

### **The Union of Students in Ireland (USI)**

The Union of Students in Ireland (Aontas na Mac Léinn in Éirinn) is the national representative body for third-level Students' Unions in Ireland. Founded in 1959, USI now represents more than 374,000 students in Further and Higher Education Colleges across the island of Ireland. The goal of USI is to work for the rights of students and a fair and equal post-secondary education system in Ireland. USI is a full member of the European Students' Union (ESU) which represents students from 46 National Students' Unions in 39 countries, and a member of Eurodoc, the European Council for Doctoral Candidates and Junior Researchers.

The Union of Students in Ireland (USI) welcomes the opportunity to respond to the consultation paper on the Apprenticeship Action Plan 2021-2025. We have grouped our responses into the following key areas:

- Governance and Learner Representation within Apprenticeships
- Development and Delivery of Apprenticeships, and Progression of Learners
- Funding of Apprenticeships
- Widening Participation in Apprenticeships

### **Governance and Learner Representation**

With regards to existing governance and management structures within apprenticeships in Ireland, USI wishes to highlight the lack of formal inclusion of apprentices particularly

the lack of direct learner representation within the Apprenticeship Council. Whilst USI notes, and welcomes the inclusion of the Irish Council of Trade Unions within the membership of the Council, given that apprenticeships are defined as combining ‘learning in education and training institutions with substantial work-based learning’, USI believes it’s important that an apprentice’s dual role as learner and worker are acknowledged through formal learner representation on the Apprenticeship Council.

To this end, USI also wishes to highlight the findings of the 2019 European Commission report on the representation of apprentices which identified and mapped apprenticeship representation structures in 37 European countries.<sup>1</sup> The report highlights a range of different practices in relation to the representation of apprentices in vocational education and training. USI would particularly highlight practice in Austria, Denmark, France, Spain and the UK where direct representation of apprenticeships is facilitated. Although USI itself recognizes the role that it plays in representing apprentices, this representation is mostly indirectly since many apprentices complete the off-the-job training element of their apprenticeship through a Higher Education Institution. It’s worth highlighting the report’s finding that ‘apprentices’ interests are better safeguarded through structures that represent apprentices directly or VET students overall’. In order to ensure that the voice of apprentices is fully included within the apprenticeship system in Ireland, USI believes that it is essential that apprentice representation is facilitated through all forms of governance.

Apprentices in Ireland are also currently indirectly represented in regional structures, such as learner representation on the boards of the Education and Training Boards. However, representatives on these boards are selected by individual ETBs and not directly elected by the learners they are there to represent, and there are no means formal mechanisms for learning representatives on these boards to engage with the students they represent. Furthermore, as the membership of these bodies isn’t currently published centrally, there is inconsistency in the way in which board membership is presented by ETBs, and thus it is not always clear who the learner representatives are. Apprentices studying at HEIs will be indirectly represented through their college Students’ Union but again, this representation is generally at a higher level such as representation on the college Governing Body, and structures that exist within other programs such as staff-student consultative bodies and program committees rarely exist for apprentices. Apprentices are also currently represented through the relevant trade union for their sector. USI enjoys a strong and effective working relationship with the Irish Congress of Trade Unions (ICTU) and many of its’ member unions. We welcome the inclusion of ICTU, and some of its’ member unions in various decision-making structures within the apprenticeship system

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<sup>1</sup> [‘Study on the Representation of Apprentices in Vocational Education & Training’](#), European Commission, 2019, pp. 2-5.

but believes that representation for apprentices could be further strengthened by the inclusion of direct learner representation.

USI is open to engaging in a conversation on how meaningful representation of apprentices can be best achieved, in collaboration with key partners including the Irish Second Level Students' Union (ISSU), the Irish Congress of Trade Unions (ICTU), SOLAS, the Higher Education Authority (HEA), and the Department of Further and Higher Education, Research, Innovation and Science.

## **Development and Delivery of Apprenticeships, and Progression of Learners**

As stated previously, USI believes that apprentices themselves are the key stakeholder when it comes to the development of apprenticeships and would welcome consideration of how they could be more meaningfully engaged in this process. The European Framework for Quality and Effective Apprenticeships lists 'Involvement of social partners'<sup>2</sup> as one of the key criteria. In order to build an effective apprenticeship system in Ireland therefore, it is essential that all social partners, including apprentices themselves are involved in the design, governance and implementation of apprenticeships in Ireland. USI believes this can be best achieved through more meaningful engagement with apprentices through direct representation of learners on boards and committees, as described in the previous section, including inclusion in industry-led consortia who are working collaboratively to develop new apprenticeship provision. Those with direct experience of apprenticeships are best placed to advise on what works best, and what doesn't work in terms of the delivery and implementation of apprenticeships as new provision is being created, for example, the most effective mode of delivery for the off-the-job training element of the apprenticeship.

USI believes that the previous point around inclusion of stakeholders in the development of new apprenticeship provision aligns closely with the document's reference to 'integration with the quality assurance and general learning environment of the Further and Higher Education sectors'<sup>3</sup>. The importance of learner involvement in quality assurance processes in Higher Education is well recognized, both nationally and internationally, underpinned by its' prominence within the Bologna Process<sup>4</sup>. In order to successfully meet their aims of greater integration with the quality processes in the Irish Further & Higher Education sector, it's vital that good practice in this sector is mirrored within the apprenticeship system. For example, learner feedback should be at the core of

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<sup>2</sup> [Recommendation on a European Framework for Quality and Effective Apprenticeships](#), European Council, 2018, p. 10

<sup>3</sup> [Apprenticeship Action Plan 2021-2025: Consultation Paper](#), Department of Further & Higher Education, Research, Innovation and Science, 2020 p. 4

<sup>4</sup> '[Bologna Process](#)', EHEA.

all Quality Assurance arrangements relating to the development of apprenticeship curricula and learner assessment. Mechanisms for direct learner feedback should be built into the Quality Assurance arrangements, and apprentices should be directly involved in the development and review of new and existing apprenticeships.

The Union of Students in Ireland strongly believes in the promotion and preservation of the Irish language, both as a key aspect of the education system in Ireland, as well as a living language. We believe that everyone on the island of Ireland should have access education through Irish, from pre-school up to third level, apprenticeships included.

Under the Official Languages Act 2003, public bodies have a duty and responsibility to provide services through Irish to the general public and providing access to these services in Irish is of the utmost importance in the revival of the language. The proposed Official Languages Bill also states a target for 20% of those recruited to the civil service For these services to be provided both in the public sector and the private sector we believe that those seeking to undertake an apprenticeship should have access to courses and training through the medium of Irish. We recommend a strategy be put in place based off the Further Education and Apprenticeship Welsh-medium action plan<sup>5</sup> as well as models introduced in the Basque country in relation to Basque apprenticeships.

It is also important that apprenticeships are not viewed as a means to an end, but as one of a wide range of pathways available within the Further & Higher Education sector which provides access to other learning opportunities, and career pathways, as per recommendation 11 of the ‘Council of the European Union’s Framework for Quality and Effective Apprenticeships’<sup>6</sup>. Progression along the National Framework for Qualifications through apprenticeships should be supported and clear information should be provided to learners on how they can use the apprenticeship pathway to facilitate entry into further programs of education.

## **Funding of Apprenticeships**

The funding of apprenticeships is an issue that needs to be addressed critically. We believe education is a public good and should be financed by the exchequer, not by students.

At the present time, it appears that apprentices are often treated more like subsidized workers than supported learners. The low pay of apprentices means that they are essentially subsidizing the cost of their training. With this, arises many difficulties, for example, how are apprentices supposed to survive on such wages while also not

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<sup>5</sup> [‘Towards Cymraeg 2050: A million Welsh speakers – Further Education and Apprenticeship Welsh-Medium Action Plan’](#), Coleg Cymraeg Cenedlaethol.

<sup>6</sup> [Recommendation on a European Framework for Quality and Effective Apprenticeships](#), European Council, 2018

having the time to make up an income they can live off? USI believes that this can be best achieved through greater oversight of the pay afforded to apprentices, to ensure parity across the system – ideally ensuring that apprentices receive at least minimum, if not living wage. If not, state support should be provided to apprentices in the form of living assistances such as a medical card, free or subsidized transport, or even Housing Assistance Payment.

At present, it is our understanding that pay for apprentices is set at a sectoral level. Whilst information on the pay for craft apprenticeships is quite easily available, information regarding apprenticeship pay for other sectors is much less easily accessible, and transparent. At the bare minimum, USI believes that it is important for potential apprentices to be able to access information regarding the pay they would be entitled to upon embarking on a particular apprenticeship, in order to make informed choices. We also believe it important that the Government ensures a minimum standard for pay to ensure that all apprentices are paid a fair wage.

The Apprenticeship Contribution Charge, introduced in Budget 2014 has created a two-tier cost system for apprentices linked to a higher education institution and those who are not. This charge is an additional burden for apprentices, accentuated by the fact that they're generally on lower wages than other workers in the same firm/sector. The decision to introduce this charge should be reversed with the necessary funding being provided by the state. By making this move and making an intervention on the issue of pay, it will send a clear message to society and, most importantly to learners that apprenticeships are valued and play a vital role in our skilled economy.

The inclusion of “skilled apprentices performing tasks at a lower cost than regular employees” within the document under the benefits of Apprenticeships for Employers is also worrying. USI is concerned about the landscape this creates and believes it sends a message that apprentices are ‘cheap labour’ for employers. Whilst USI recognizes the need to encourage employers to take on apprentices, we believe this can be best achieved through meaningful financial support for employers to enable them to pay a fair wage to their apprentices. USI believes Ireland should look to the German and Austrian models where apprentices are treated appropriately, for example in Germany; apprentices have now won the right to be paid the minimum wage<sup>7</sup>.

Overall, we are in a situation where we need to change the conversation and rhetoric around apprentices and while recognizing the major skills shortage, reversing the decision to introduce the contribution charge and increasing direct state investment would help to address these two issues.

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<sup>7</sup> L&E Global, November 2019, Available at < <https://knowledge.leglobal.org/germany-wide-minimum-wage-for-apprentices-will-come-into-force-by-2020/>>. Accessed 15 September 2020

## Widening Participation in Apprenticeships

USI welcomes previous initiatives such as the Generation Apprenticeship campaign which aimed to increase awareness of apprenticeships amongst potential apprentices – USI would welcome further development of this campaign and other initiatives to increase interest in apprenticeships, such as enhanced awareness of apprenticeship pathways amongst guidance counsellors. The provision of informed guidance education in the pathways into apprenticeships, further pathways upon completion of apprenticeships and the diverse apprenticeship offerings need to be conveyed to young people. A perception exists within society that apprenticeships are a ‘lesser’ alternative to other forms of education. A significant barrier to recruitment of apprenticeships is persuading public opinion that an apprenticeship is a credible and equal route to a professional career.<sup>8</sup> Coupled with increased awareness of apprenticeships, we need to reexamine our attempts to diversify the participation within apprenticeships in Ireland. In 2018, 85% of Irish apprentices were young men under 25 years of age. From the 14,953 apprentices completing training in October of 2018 only 332 or 2% were women<sup>9</sup> highlighting the immense need to encourage and support greater diversification within apprenticeships. In comparison, in England, in the 2018/19 academic year, the number of women and men commencing apprenticeships was almost equal with slightly more women (50.1%) starting apprenticeships compared to 49.9% of men.<sup>10</sup>

Encouraging increased female participation within apprenticeships involves addressing the barriers to accessing apprenticeships. Both employers and education and training providers outlined that apprentices are heavily reliant on their apprentice salary and experience particular financial challenges when they were required to live away from home while doing some of their off-the-job training.<sup>11</sup> Females in many cases are the primary care giver for children and often feel the impact of accessing quality and affordable childcare difficult.<sup>12</sup> When aiming to increase female participation, the occupational segregation, which exists due to majority of apprenticeships being in the trades which are traditionally male dominated areas of work cannot be addressed in isolation. Females are often undertaking lower paid apprenticeships, and few commence advanced apprenticeships.<sup>13</sup> The participation of females remains in the minority, with five of the ten apprenticeship groupings with none or low levels of female participation.

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<sup>8</sup> [Houses of the Oireachtas Joint Committee on Education and Skills, Report on Hearings Relating to the Uptake of Apprenticeships and Traineeships](#), 2019, p. 9

<sup>9</sup> [Review of Pathways to Participation in Apprenticeship](#), SOLAS, 2018, p. 3

<sup>10</sup> Foley, N., [Briefing document: Apprenticeship Statistics](#), 2020, p.13

<sup>11</sup> [Review of Pathways to Participation in Apprenticeship](#), SOLAS, 2018, p.5.

<sup>12</sup> [Apprenticeships and Gender](#), Trades Union Congress P. 12

<sup>13</sup> [Still more \(better paid\) jobs for the boys - Apprenticeships and Gender Segregation](#), Trade Unions Congress, 2007, p.3

Women are more strongly represented in the hospitality apprenticeships, where 17% of apprentices are women and in finance, where female participation, at 44.5% is approaching parity.<sup>14</sup>

Diversification within apprenticeships is important to support greater inclusion of those from lower socio-economic backgrounds and diverse ethnic backgrounds into apprenticeships. Contributors to SOLAS research outlined that while apprentices are a mixed group there are a significant minority who come from lower socio-economic backgrounds and many are heavily reliant on their apprentice salary.<sup>15</sup> In 2018, the number of people with disabilities was 423 or 2.8% of the apprentice population, highlighting the need to support greater inclusion of those with a disability into apprenticeships. It is crucial that skills development through apprenticeship becomes a realistic and accessible to our young people. If a lack of diversity continues within the apprenticeship population, we are at risk of the ambition of our young people not being realized, with negative consequences on our economy and society as a whole.

Making informed choices regarding their educational progression is important for young people including sectoral pay upon completion of their apprenticeship or degree program. Young people need transparency and information when making decisions relating to their education. In recent years, significant development of apprenticeships has seen the development of advanced apprenticeships leading to progression across the National Framework of Qualifications including up to PhD level. Yet, greater development of these initiatives are needed alongside greater promotion of these pathways. These pathways needed to be highlighted to young people within second level to make apprenticeships more enticing alongside shifting public perceptions.

In recent years, access initiatives within higher education has seen an increase in the number of learners from lower socio-economic backgrounds, ethnic minorities, people with disabilities and those with caring responsibilities entering higher education. With the development of the National Access Plan<sup>16</sup> and targeted financial and social support for the six targeted groups, has resulted in significant increase in participation of those from these targeted groups. A similar access initiative to that which exists within Further and Higher Education could be implemented within the apprenticeship system to attract and support those from lower socio-economic backgrounds and would encourage increased participation of women, people with disabilities and ethnic minorities to apprenticeships.

Addressing the social and societal barriers to accessing apprenticeships is vital, although it needs to be accompanied with steps to removing the financial barriers to

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<sup>14</sup> [Review of Pathways to Participation in Apprenticeship](#), SOLAS, 2018, p.7

<sup>15</sup> [Review of Pathways to Participation in Apprenticeship](#), SOLAS, 2018 p.5

<sup>16</sup> [National Plan for Equity of Access to Higher Education 2015-2019](#), HEA, 2015, p.34

apprenticeships. For some, lower levels of previous educational attainment which for some is linked to a poor school experience or their family circumstances during the time of their formal education impacted on their reliance on their apprentice salary. Within the SOLAS research <sup>17</sup>, it was also noted that some apprentices dropped out of their training due to socio-economic factors, including lack of sufficient finance, home circumstances, and physical or mental health difficulties. As outlined above, the pro-rata student contribution impacts massively on apprentice income and we would advocate for its' removal, to be replaced by exchequer funding to cover this cost. This would allow for greater inclusion and diversity within the apprenticeship system.

## **Conclusion**

USI is committed to working closely with the Department of Further & Higher Education, Research, Innovation and Science, and all sectoral stakeholders to ensure the development of a thriving apprenticeship system in Ireland that places the needs of apprentices at its' core.

USI wishes to see the voice of apprentices featuring more centrally in the development of new apprenticeship programs and pathways, to see apprentices being paid a fair wage, and being supported to achieve their full potential and to see an increased diversity amongst the apprentice population in Ireland. In order to achieve this, it is vitally important that apprentices are afforded a stake in their own education, and this can be best achieved through meaningful representation of apprentices on all committees and decision-making bodies pertaining to the apprenticeship system, and inclusion of learners within quality assurance mechanisms for apprenticeships.

Finally, in providing this written submission to the Department, USI would be happy to be involved in further conversations relating to the development of the 2021-2025 Action Plan, and would welcome the opportunity to meet with Department officials to discuss the contents of this submission.

## **References**

'Apprenticeship Action Plan 2021-2015: Consultation Paper', Department of Further & Higher Education, Research, Innovation and Science, 2020.

'Apprenticeships and Gender', TUC and YWCA.

'Bologna Process', European Higher Education Area.

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<sup>17</sup> [Review of Pathways to Participation in Apprenticeship](#), SOLAS, 2018, p. 5



'Germany: wide minimum wage for apprentices will come into force by 2020' in L&E Global, 2019, accessed on 15 September 2020.

<<https://knowledge.leglobal.org/germany-wide-minimum-wage-for-apprentices-will-come-into-force-by-2020/>>

'National Plan for Equity of Access to Higher Education 2015-2019', Higher Education Authority, 2015.

'Recommendation on a European Framework for Quality and Effective Apprenticeships', Council of the European Union, 2018.

'Report on Hearings Relating to the Uptake of Apprenticeships and Traineeships', Joint Committee on Education and Skills, Houses of the Oireachtas, 2019.

'Review of Pathways to Participation in Apprenticeships', SOLAS, 2018.

'Still more (better paid) jobs for the boys: Apprenticeships and Gender Segregation', TUC.

'Study on the Representation of Apprentices in Vocational Education and Training', European Commission, 2019.

'Towards Cymraeg 2050: A million Welsh speakers - Further Education and Apprenticeship Welsh-medium Action Plan', Coleg Cymraeg Cenedlaethol.