

Traineeships Funding in England: consultation response form

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Yes, I would like you to publish or release my response

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The closing date for this consultation is 14th August 2014

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Traineeships.CONULTATION@education.gsi.gov.uk

Alternatively, you can send them to: Sue Ruck, Pre-employment & Basic Skills Unit, Department of Business, Innovation and Skills, 2 St Paul's Place, Sheffield S1 2FJ. Tel: 0114 207 5255

Please tick a box in the list of options below that best describes you as a respondent to this consultation.

<input type="checkbox"/>	Representative organisation/trade body
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	Awarding Organisation
	School
X	Charity or social enterprise
	Individual
	Legal representative
	Local Authority
	Other public sector body
	Direct Grant Employer*
	Large business (over 250 staff)
	Medium business (50-250 staff)
	Small business (10-49 staff)
	Micro business (up to 9 staff)
	Trade union or staff association
	Professional body
	Other (please describe)

Introduction

NIACE is the National Institute of Adult Continuing Education, the national voice for lifelong learning. We are an internationally respected development organisation and think-tank, working on issues central to the economic renewal of the UK, particularly in the political economy, education and learning, public policy and regeneration fields. We campaign for the personal, social and economic benefits from lifelong learning, work to improve people's experience of the adult learning and skills system, and fight for all adults to have opportunities throughout their lives to participate in and benefit from learning.

Background

NIACE welcomed the introduction of Traineeships in 2013 and since then, we have worked closely with BIS, the Skills Funding Agency, providers and learners to support the development and implementation of this policy. We have consistently highlighted the potential of the programme in providing a crucial bridge to employment for young people who are motivated to work, but require additional help to make an effective and sustained transition to employment or an apprenticeship.

During the last 12 months NIACE has undertaken a range of work to support the implementation of the programme, this has included identification of early good practice in the delivery of the programme, research to explore how Traineeships can work in the context of a LEP area and STEM job roles and strategic involvement in the Traineeship Staff Support Programme. Using the evidence gained from this work we have provided policy advice to BIS, developed and disseminated case studies of practice and delivered national dissemination events for the sector.

Central to our work has been extensive engagement and consultation with key stakeholders, including learning providers, employers, IAG providers and, in particular, Trainees. NIACE believes that the voice of the learner is a crucial factor in the informed development of policy and practice; our recent work around Trainee Voice has enabled us to ensure that Trainees views are heard and represented.

Summary

Since the launch of Traineeships, government is to be commended for its responsiveness in adapting the programme to maximise outcomes for learners. NIACE particularly welcomes:

- Relaxation of the 16-hour rule that previously restricted JSA claimants' participation in a Traineeship.
- Extension of the programme to young people up to the age of 24.
- The removal of the requirement for providers to secure a work experience placement before recruiting a Trainee.

- Replacement of the consecutive 6-8 week work placement rule with a more flexible approach based around hours.

NIACE believes that Traineeships provide a focused, yet flexible programme that fills a gap in provision and provides a bridge to employment for many young people. The three core components of work preparation, a work placement and maths and English support are appropriate and responsive to young people's needs. All three components make a difference in enabling young people to progress to employment.

Whilst initial take up of the programme has been slower than anticipated, we are confident that recent changes to the policy are likely to result in increased learner numbers and positive outcomes for Trainees. However, we would urge government to:

- Align the eligibility criteria for young people aged 16-18 and 19-24 to prior achievement below level 3. The current eligibility criteria for 19-24 year old Trainees is below full level 2. Providers report turning away significant numbers of young people who could benefit from a Traineeship because they already hold a full level 2 qualification. We welcome the inclusion of this within the consultation.
- Improve the visibility/understanding of the programme, particularly amongst employers, for example through a media campaign or employer forums.
- Take action to ensure that referral and support agencies have a consistent understanding of the programme. Providers continue to report concerns about levels of awareness and understanding of Traineeships by key referral agencies, particularly Jobcentre Plus. Action could include briefings for JCP staff, training sessions or events.
- Consult on the potential introduction of an 'intensive Traineeship' for young people who are motivated to work, but are further from employment and require more intensive levels of support if they are to make effective transitions to work or an Apprenticeship.

NIACE welcomes the opportunity to respond to this consultation and is happy to provide further detail and support to government in progressing the Traineeship agenda.

Question 1: Should Traineeships funding have a greater focus on positive outcomes than it does at present? (Paras 1-9)

Yes No Not sure

Please explain your response:

Outcomes payments are currently incorporated into Traineeship funding for learners

aged 19+ and are linked to both qualifications and progression to employment. There is currently no outcome payment focus in relation to funding for 16-18 learners.

The aim of the Traineeship programme is clear; it's designed to support and enable young people who are motivated to work to progress into employment or an apprenticeship. NIACE supports the principle of outcome payments as a method of maximising the achievement of programme aims; we also support the current level of focus on positive outcomes within Traineeships. However, we are concerned that a greater focus could potentially result in a number of negative consequences:

- Providers diverting funding away from the direct delivery of Traineeships to the management and implementation of tracking systems/outcomes.
- Delivery of Traineeships becoming a financial risk to providers, as a result of insecurity around whether funding will cover the full costs of their delivery. This would disproportionately impact upon small providers and third sector providers. In addition, it is likely that some providers would choose to target (and limit) their Traineeship provision to young people whom they are most confident will achieve positive outcomes quickly. NIACE is particularly concerned that this could impact negatively upon young people who, though they fall within the broad target group for Traineeships, will require more support to progress to employment than other young people. These young people may effectively find themselves informally excluded from Traineeships by providers who choose to focus on young people who represent less financial risk to them. In addition, providers' practices, partnership and sub-contracting arrangements are also likely to become more risk averse and therefore potentially less innovative. We believe that a greater focus on outcomes payments could result in less flow through of funding to third sector organisations who potentially have a key role to play in supporting the delivery of Traineeships, particularly for young people from under-represented groups.

Recent research undertaken by CFE and NIACE called for job outcome payments to be differentiated according to the labour market conditions within the locality in which each provider operates. There is evidence that within the Work Programme job outcome payments do not reflect overall labour market conditions, let alone local labour market conditions, as payments are the same whether the overall and/or local economy is buoyant or sluggish. Consequently, Work Programme providers have struggled to earn enough income to meet their costs from the job outcome payments attainable in what has turned out to be a sustained economic downturn. This is an important issue that should be considered when analysing the potential introduction of a greater focus on positive outcomes in the context of Traineeship funding.

Question 2: Is it important for successful Traineeship delivery to have greater consistency in funding arrangements between the 16 to 18 and 19 to 24 age

groups? (Paras 1-9)

Yes **No** **Not sure**

Please give further information to justify your answer:

NIACE's work with providers has highlighted that disparities in the funding arrangements for Traineeships between 16-18 learners and 19-24 learners is problematic. Across the interviews that we have undertaken, in only two cases was there any indication that providers were specifically targeting young learners because they are perceived as attracting higher rates of funding. However, lack of consistency in the way that Traineeships are funded for the different age groups is perceived as unnecessary; providers report that it makes the planning of programmes more difficult and results in high levels of bureaucracy.

Question 3: Are Apprenticeships, other jobs and further learning the right progression outcomes to reward? (Para 12)

Yes **No** **Not sure**

If you answered 'no' or 'not sure', please explain your answer:

NIACE believes that Apprenticeships and further learning are the right progression outcomes to reward through Traineeships. Whilst we also agree that 'other jobs' is a valid outcome, we believe that the desired outcome of a Traineeship in relation to work should be 'other jobs with training'. Young people who enter jobs without training are less likely to sustain their employment, less likely to progress and more likely to get caught in the 'churning' effect of the low pay-no pay cycle.

NIACE's research highlights that during the early stages of delivery of the programme, providers were unclear about the acceptability of further learning as a progression route for Trainees. Whilst we welcome clarity about further learning as a progression outcome, it will be crucial for government to clearly define this, so that both providers and Trainees have a clear understanding of what constitutes successful completion of a Traineeship in the context of further learning from the outset. One of the key strengths of the Traineeship programme is its clear and central focus upon enabling young people to secure employment. We believe that this must remain at the core of the programme and, therefore, any definition of further learning as an acceptable progression outcome must focus on enabling participants to progress on the journey towards employment.

NIACE welcomes the government's recognition that self employment may be a progression outcome for Trainees, but urges government to support all young people to continue accessing further training. We would also urge government to consider volunteering activity as a progression outcome and to clearly define what constitutes

volunteering in this context. There is extensive evidence demonstrating the value of volunteering in enabling people of all ages to develop skills and confidence that moves them closer and often into employment. In addition, research by UKCES and others highlights the importance of enabling young people to extend their networks and links with organisations and potential employers. It is these personal relationships and networks that often enable young people to secure their first job. Volunteering is an effective way of doing this.

Question 4: Are the principles we are applying to the definition of job outcomes the right ones? (Para 15)

Yes **No** **Not sure**

If not, what alternative principles do you suggest?

The four principles outlined are reasonable, however, they will need to be translated into practice which will require clear definitions and criteria. NIACE's main concern is that measurement/tracking processes do not become too complex and time intensive for providers, as this could effectively result in a shift in focus, less funding for programme delivery (as described in our response to question 1) and have a negative impact upon learners' experiences of the programme. In respect of this, NIACE is particularly concerned about how, in practice, providers will be required to evidence causality.

Question 5: Should the job outcome definition for Traineeships exclude employment under 16 hours per week? (Paras 16-17)

Yes **No** **Not sure**

Please explain your response:

Whilst NIACE believes that employment (with training) of more than 16 hours per week should be the **target** outcome in relation to work for Trainees, we believe it is crucial that part time employment (with training) is also recognised as a valid outcome.

One of the criteria for participation in a Traineeship is that a young person has little or no experience of the world of work. Therefore, the majority of Traineeship participants will not previously have been employed in any capacity. For these young people, and from a 'distance-travelled' perspective, progression from the starting point of no previous employment to part time employment is extremely positive. It represents that a young person has achieved a significant milestone in their life.

Whilst youth unemployment is moving in the right direction, research shows that labour market conditions continue to be tough – for example, data shows that levels of under-employment continue to be high. In this context, part time employment should be considered a realistic and valuable entry route to the world of work for young people. Research shows that people in work have greater chances of progressing than those who are out of work; part time work is often a route to full time employment and, therefore, should be seen as a valid outcome of a Traineeship. Another factor that should be taken into account is local labour market conditions; entry routes to employment for young people vary throughout the country. NIACE believes that local labour market data should be taken into account when defining outcomes for programmes such as Traineeships.

In conclusion, whilst accepting that employment of more than 16 hours per week should be the target outcome in relation to work for Trainees, we believe it is crucial that part time employment is recognised as an outcome. NIACE recognises that this has implications for government in terms of young people in receipt of benefits and suggests that further work is required to explore the cost implications/to model different options.

Question 6: Should the job outcome definition include self-employment, provided that the individual has an income equivalent to at least 16 hours per week at NMW? (Paras 16-17)

Yes **No** **Not sure**

Please explain your response:

NIACE believes that it is important to recognise enterprise skills in young people and agrees that self employment should be defined as a valid outcome of a Traineeship, as set out in the consultation.

Question 7: How far do the above examples support the principles set out in paragraph 15? (Para 18)

Comment:

The three examples provided support the principles set out in paragraph 15 of the consultation to different degrees and highlight our concern about the complexity of translating the principles into practice. Until the extent to which Traineeship funding is focussed on positive outcomes (the percentage payment) has been defined, it is difficult to assess the implications of each example, however, at this stage NIACE suggests that example 1 is most feasible. Examples 2 and 3 would require providers to invest unrealistic levels of resources; long term sustainment requires not just

keeping in touch with participants for longer time periods (which, in reality, is challenging even over short time periods) but also commonly includes offering in-work support - partly as an incentive for the participant to stay in touch, but also to help sustain the employment for a longer time period (research shows that many participants require such extra support to keep their job). A good example of this can be found within the Work Programme, where the job outcome payment is made for people being in work for 13 weeks and sustainment payments are payable every 4 weeks after that. Many Work Programme providers have established in work support provision to enable participants to sustain employment; despite this, providers regularly lose touch with many participants.

In conclusion, NIACE considers example 1 to be more realistic and preferable compared to examples 2 and 3. However, NIACE urges government to consider a model that rewards employment sustained for 4 weeks within either 6 or 12 months of the Traineeship ending, because the value of a Traineeship lasts much longer than 3 months after it has finished.

Question 8: What do you consider to be the benefits and drawbacks of each approach? (Para 18)

Comment:

It is difficult to provide a definitive response to this question until the focus on positive outcomes has been defined. Please see our response to question 7.

Question 9: In your experience what proportion of trainees would you expect to progress into each of a) an Apprenticeship; and b) sustainable employment? (Para 18)

Please give details:

It is difficult to respond to this question with accuracy as progression outcomes/destinations of Trainees is influenced by a wide range of factors including:

- Local labour market conditions – for example, there are significant regional variations in apprenticeship vacancies. Therefore, in an area with a relatively low number of apprenticeship vacancies it would be reasonable to expect lower rates of progression along this route.
- The group of learners that providers are delivering to – many providers believe that Traineeships are a valuable pathway for young people who have not achieved highly through initial education and are not motivated to participate in a

Study Programme. Whilst these young people will be working towards a level 2 qualification in maths and English as part of their Traineeship, many will achieve positive job outcomes before reaching this level. These young people would not meet the apprenticeship entry criteria. Therefore, applying a common target for progression to apprenticeships and sustainable employment to all providers would disadvantage providers who are targeting their provision at learners who are further from level 2 and therefore less likely to progress to an apprenticeship. This would have significant implication for learners and would be likely to result in Traineeships becoming less inclusive.

NIACE strongly believes that common national targets around outcomes should not be set. NIACE suggests that government should consider collecting and publishing outcomes data in the first 1-2 years of the programme in order to develop local benchmarks from evidence. Any consideration of targets/benchmarks should be based around local context and subject to an equality impact assessment prior to implementation.

Question 10: Do you agree that further learning should be defined using the same reference period as that for Apprenticeships and other jobs? (Paras 19-21)

Yes **No** **Not sure**

Please explain your response:

NIACE agrees, in principle, that the reference period should be the same. However, as outlined in our response to question 3, this may be influenced by the definition/criteria of further learning that is adopted. It is crucial that the reference period takes account of the further learning options available to young people in their locality, for example, where courses have just one start date per year.

Question 11: If not, what definition do you propose is used and why? (Paras 19-21)

Comment:

Question 12: Should further learning as an outcome be restricted to particular types or levels? (Paras 19-21)

Yes **No** **Not sure**

Comment:

NIACE believes that all learning is valuable and positive for young people. However, the purpose of a Traineeship is clear; the programme is designed to enable young people to make the transition to employment. In this respect it is crucial that, through their ongoing assessment procedures and towards the end of a Traineeship, providers ensure that Trainees receive high quality information, advice and guidance. This will enable Trainees to make informed decisions about their options and the opportunities available to them in their journey towards employment and should mitigate against young people drifting into different types of learning without a clear understanding of the employment pathway they are on.

Further learning as a Traineeship outcome should be focussed on the principle of progression towards employment. Whilst we do not believe the type of learning should be restricted, it must enable young people to progress towards their individual employment goal, rather than set at an arbitrary level.

Progression is most likely to be effective if learners are supported to achieve at a higher level of learning to their prior achievement. However, whilst many Trainees are clear and focussed on a particular career path, in some circumstances Trainees may opt for a change of career path as a result of their participation in the programme. In such circumstances further learning at the same level as prior achievement may be the most appropriate option if based on effective assessment of the learners' goals and needs.

Question 13: Please provide details of what type of further learning after a Traineeship should be considered an appropriate progression outcome and give reasons for your answer.(Para 19-21)

Comment:

Please see our response to question 12.

To reiterate, NIACE believes that further learning as a Traineeship outcome should be focussed on the principle of progression towards employment. Whilst we do not believe the type of learning should be restricted, it must enable young people to progress towards their individual employment goal, rather than set at an arbitrary level.

Progression is most likely to be effective if learners are supported to achieve at a higher level of learning to their prior achievement. However, whilst many Trainees are clear and focussed on a particular career path, in some circumstances Trainees may opt for a change of career path as a result of their participation in the programme. In such circumstances further learning at the same level as prior achievement may be the most appropriate option if based on effective assessment of the learners' goals and needs.

Question 14: What proportion of trainees would you expect to progress into further learning? (Paras 19- 21)

Comment:

Please see our response to question 9.

To reiterate, NIACE strongly believes that common national targets around outcomes should not be set. NIACE suggests that government should consider collecting and publishing outcomes data in the first 1-2 years of the programme in order to develop local benchmarks from evidence. Any consideration of targets/benchmarks should be based around local context and subject to an equality impact assessment prior to implementation.

Question 15: How do you track learner outcomes currently and what do you use as evidence to validate outcomes? (Paras 22-23)

Comment:

NIACE is not a learning provider and, therefore, does not directly track learner outcomes. However, research undertaken by NIACE in 2014 on behalf of BIS found that although tracking learners is challenging, the use of creative, systematic and mixed method approaches is most effective. Based on this research NIACE made the following recommendations to government:

- Providers should be given enough time to develop robust approaches to tracking before Adult Skills Budget funding is linked to outcomes.
- Research should be undertaken to assess the affordability of securing stringent criteria, evidence and corroboration requirements.
- Research should be undertaken to determine whether additional funding for tracking should be made available to small providers that do not benefit from economies of scale.
- Any funding linked to outcomes should be based on a sophisticated payment structure that takes into account reasonable response rates, national and local labour market conditions and robust data relating to the actual costs of helping different groups of participants secure different outcomes.
- Steps should be taken to remove the barriers that prevent other publicly funded services from sharing their knowledge of learner destinations.

As stated previously, effective tracking of learners is challenging for providers. NIACE urges government to consider implementing a provider support programme around destination tracking of learner outcomes.

Question 17: Are these the correct principles for an outcomes-based Traineeship funding system? (Paras 25-26)

Yes **No** **Not sure**

Please explain your response:

Yes, NIACE believes the principles outlined in the consultation are reasonable. However, as discussed in our response to question 4, translation of the principles into implementation will be crucial in determining impact on learners and providers and will be particularly influenced by the level at which an increased focus on outcomes payments is set and which outcomes are recognised.

Question 20: Do we need additional mechanisms to prevent any abuse of the flexibilities in the programme, which could lead to insubstantial and insufficiently stretching programmes? If so, what do you suggest? (Paras 27-29)

Yes **No** **Not Sure**

Comment:

NIACE's work around Traineeships has not provided specific evidence in relation to this question.

Question 21: Do you have any comments on the proportion of the funding that should be paid at each stage of the programme? (Paras 27-29)

Comment:

Of the 4 approaches outlined in the consultation, NIACE believes that approach 2 would be most effective. Whilst acknowledging that the percentage of funding attached to each of the triggers outlined in all 4 approaches would significantly influence how providers manage the programme, options 3 and 4 are far more complex and would be significantly more likely to carry greater financial risk for providers. NIACE's concern is that this would impact negatively upon learners, as outlined in our response to question 1.

Approach 2 has the potential to enable government to secure a balanced focus on meeting providers' front end costs in planning, setting up and delivering Traineeships, whilst rewarding a key milestone and a positive outcome.

One of the key strengths of Traineeships is its flexibility. It enables providers to develop a programme that is responsive to the needs of an individual young person. However, NIACE's research has highlighted that this is often resource intensive, particularly with learners who require more support than others – for example,

learners from particular backgrounds (such as care leavers) or learners in specific circumstances (such as young adult carers or lone young parents). For this reason it is crucial that any change in funding arrangements recognises the (often) high front end cost of Traineeship provision. On this basis we would suggest that the funding proportions applied through approach 2 should be 40% for engagement, 40% for milestone and 20% for positive outcome.

Question 22: Which option do you consider will make it most likely English and maths learning will be stretching?

Option 1 **Option 2**

Please explain your response:

Whilst the Traineeship programme is comprised of 3 core components, NIACE's work shows that, when delivered most effectively, it is as an integrated and coherent programme of learning. For example, to ensure that English and maths learning is stretching it is important that providers do not deliver English and maths in isolation, or without context. The most effective Traineeship providers give consideration to the English and maths skills that Trainees will be required to have in their work placement(s) and the role of employers in supporting young people to develop these skills.

Mixed and contextualised approaches to maths and English are particularly effective at stretching learners – where providers deliver a mixture of embedded activity (giving the group or individuals opportunities to work on real employer projects to improve their skills - which can be directly linked to their work placement), focused taught sessions and the use of digital technology.

NIACE's research for the Gatsby Charitable Foundation around the potential of STEM-focussed Traineeships strongly highlighted employers' views that maths provision should be contextualised to STEM job roles for it to be stretching, relevant and meaningful.

Option 1 is most likely to be effective in enabling providers to develop coherent and creative Traineeship provision, focussed around the needs of individual young people, with stretching maths and English at the core.

Question 23: Which option do you consider will make it most likely English and maths learning will be continued to completion after a traineeship has finished, and why? (Paras 30-35)

Option 1 **Option 2**

Please explain your response:

Ideally Trainees will achieve the required maths and English levels within the duration of their Traineeship. However, government is correct in recognising that for some Trainees this is unrealistic. This may be because they achieve a positive outcome early or because they require longer than 6 months to achieve the required level.

Option 2 would make it more likely that maths and English learning is continued to completion after a Traineeship has finished, as there would be greater incentive for the provider to ensure that this is the case.

Question 24: Which option will be easier to administer for training providers, and why? (Paras 30-35)

Option 1 **Option 2**

Please explain your response:

Option 1 would involve much less administration (and therefore cost) for providers. This is important given that the consultation states that option 2 would not result in any increase in funding for Traineeship provision.

Question 25: Should the current arrangements for administering learning support funding to providers and financial support for learners continue to be applied to Traineeships from 2015/16? (Paras 36-37)

Yes **No** **Not Sure**

Please explain your response:

NIACE agrees that the current arrangements for learning/financial support should continue to be applied during 2015/16. However, we encourage government to explore how the system could become more integrated and consistent for the different age groups from 2016/17, and, in particular, to undertake an equality impact assessment of potential models prior to implementation to ensure that there are not adverse consequences for particular groups of learners.

NIACE's work shows that some providers do not have a thorough understanding of the current arrangements for administering learning support and financial support funding. This is particularly the case for providers who are seeking to engage different learners to those that they traditionally work with. A clear briefing and examples of practice for providers would help to address this issue.

Question 26: If not, what would you change as a means of bringing greater

consistency to the way learners are supported across 16 to 24 Traineeships in order to best support disadvantaged learners? (Paras 36-37)

Comment:

Question 27: Do you think that Traineeships funding should continue to be contracted through the existing arrangements, or aligned with the current Apprenticeship arrangements? (Paras 38-42)

Existing Arrangements Apprenticeship Arrangements

NIACE's work around Traineeships has not provided specific evidence in relation to this question.

Please explain your response:

Question 29: Should the eligibility rules for 19 to 24 year olds be changed so that 19 to 24 year olds can undertake a Traineeship if they are qualified to a Full Level 2? (Paras 43-47)

Yes No Not sure

Please justify your answer:

Yes. A significant number of the providers that NIACE has consulted with during the previous 12 months report being forced to turn young people from the older cohort away from a Traineeship programme, because they already hold a full level 2 qualification. These young people are considered by providers as appropriate for a Traineeship – they are not in employment, have little or no work experience, but are motivated to work; they are assessed by providers as having a reasonable chance of being ready for employment or an Apprenticeship within six months of engaging in a Traineeship. The following two quotes, from providers, highlight this:

“The main issue [with Traineeships] is that of the restrictions to the 19-24 year old candidates. By limiting them to below full level 2 we have found recruiting for this group in particular very challenging. Recent initiatives in schools, colleges and local adult education centres to offer free Level 2 support has meant that very few of the people who come to us in this age range to do traineeships are eligible to go onto the programme. We are turning away several excellent candidates a week who

would benefit from the experience a Traineeship would give because of a full Level 2 qualification. These people often have no work experience and have been struggling to get applications accepted onto full apprenticeships but now get stuck in between the two models. “

“Because someone has a full level 2 does not mean they are employable! Many 19-24 year olds need individualised support to gain experience and prepare for work.”

NIACE strongly urges government to align the eligibility criteria for 16-18 and 19-24 year olds, to below full level 3. We are confident that this will enable significant numbers of young people from the older cohort to participate in a Traineeship and gain the skills, experience and support they need to make a sustained transition to employment. It will also create a more inclusive Traineeship programme, which breaks down an artificial age barrier to learning, focussing on the needs of the individual young person rather than spurious divisions between young people.

Finally, throughout the consultation there is a welcome focus on potentially modifying the Traineeship programme to bring about greater consistency and coherency; government is to be commended for this. NIACE believes that alignment of the eligibility criteria for 16-18 and 19-24 year olds is of fundamental importance in securing an inclusive, effective and coherent Traineeship programme.

Question 30: Should this depend on the nature of the Level 2 qualification and if so how? (Paras 43-47)

Yes No Not sure

Comment:

NIACE agrees that the Traineeship target group should continue to be young people who are not in employment, have little or no work experience, but are motivated to work; and are assessed by providers as having a reasonable chance of being ready for employment or an Apprenticeship within six months of engaging in a Traineeship.

Providing that this criteria continues to be applied in Traineeship recruitment and assessment processes, we believe that the nature of the level 2 qualification held by a young person should not be a factor in their eligibility.

Whilst qualifications are an important part of Traineeships for many young people, the programme is primarily designed to enable participants to progress to employment. Work experience and wider employability (which is often not linked to a qualification) are fundamental to this progression and, in the context of Traineeships, are at least equally as important as qualifications. Qualifications alone do not make young people employable – Traineeships present an opportunity to maximise the all

round 'employability' of a young person – including skills, qualifications, experience, attitude, confidence and behaviour.

Question 31: Should this depend on whether a person already has already reached a high enough standard in English and maths? (Paras 43-47)

Yes No Not sure

Comment:

Please refer to our response to question 30. NIACE's position in relation to prior achievement in English and maths is the same as our position in relation to level 2 qualifications.

Question 32: If a change is made, do you consider that it is necessary to make the change in 2014/15 or 2015/16? (Para 43-47)

2014/15 2015/16 Not sure

Please explain your response:

NIACE believes that alignment of the eligibility criteria to below level 3 for young people across the two age cohorts should be implemented in 2014/15. This would enable more young people to benefit from the programme quickly, and would support government priorities around tackling youth unemployment and apprenticeships.

Further Information (relevant to training providers, including direct grant employers)

NIACE is not a training provider.

Did you deliver Traineeships in 2013/14?

Yes No

If yes, to what age groups?

16-18 19-23

Did you deliver Apprenticeships in 2013/14?

Yes No

If yes, to what age groups?

16-18 19-23 24+

Do you plan to deliver Traineeships in 2014/15?

Yes No

If yes, to what age groups?

16-18 19-24

Do you plan to deliver Apprenticeships in 2014/15?

Yes No

If yes, to what age groups?

16-18 19-23 24+

Further Information (relevant to employers, including direct grant employers)

NIACE is not responding in its capacity as an employer

Have you offered work experience placements to young people undertaking Traineeships during 2013/14

Yes No

Do you plan to offer work experience placement to young people undertaking Traineeships during 2014/15

Yes No

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.

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

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

X Yes No

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BIS/14/856RF - Traineeships Funding in England - Funding Reform Technical Consultation - Response Form