

# Flexi-Job Apprenticeships: Reshaping the role of Apprenticeship Training Agencies

A response from the Recruitment &  
Employment Confederation (REC)

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## Our vision for flexi-job apprenticeships

### 1. Do you agree with our vision for flexi-job apprenticeship schemes?

The move towards flexi-job apprenticeships is a step in the right direction as it will allow apprenticeship training to be split across employers, but the mechanism agreed must allow recruiters to use this scheme to train temporary workers who are on multiple assignments with various clients over the duration of the apprenticeship. It cannot be limited to one type of "employee" or worker.

REC particularly welcomes recognition by government of the need to seek views from 'sectors with varied employment models'. Although apprenticeships are an important source of skills training for a certain type of worker, the apprenticeship levy has meant a low ROI for the 1 million people who work on a temporary or contract assignment on any given day in the UK and for the recruitment industry - who are desperate to train temporary workers to fill skills shortages identified by their clients. These shortages are acute in many industries, such as care, construction, and drivers.

The nature of temporary work and the roles on offer means that an apprenticeship, whether flexible or not, is not the training required. We agree that an apprenticeship should be at least 12 months in duration, and we should never compromise on the standards expected of a programme that is called an apprenticeship. We have previously suggested that a solution to the levy would be to broaden out the scheme so payments made by recruitment businesses on their temp staff on their payroll could be used by this category of worker to fund an accredited training programme instead.

We are very keen to work with government to find solutions to the training needs facing the UK economy and that will support people into the job vacancies employers are increasingly struggling to fill. Although we understand and welcome the support for apprenticeships, we think it untenable to not have a government supported system offering career pathways and opportunities for the flexible labour market in the UK. Those who need or want to work in a flexible way must be part of the government's levelling up agenda.

### 2. How should flexi-job apprenticeships demonstrate that they are meeting the needs of employers?

Flexi-job apprenticeships need to ensure they are as flexible as possible to meet the needs of employment businesses. The nature of temporary work means that shift patterns can be unpredictable and sporadic. Flexi-job apprenticeships need to be structured in a way that can accommodate unorthodox working patterns without detriment to the employer or worker. The expectation is that apprenticeships will be of at least 12 months duration, however, given the nature of temporary work, flexibility to extend the period of an apprenticeship to accommodate breaks in assignments would be beneficial to both the employer and apprentice.

In a standard apprenticeship, an apprentice would spend 1/5 days training rather than working. As temporary work is less consistent than full time work, it would be beneficial to allow the training to be conducted in blocks between assignments, rather than taking out valuable time when the apprentice could otherwise be working. The flexibility would help employers find suitable clients for these apprentices and would mean the amount of training the worker receives is the same as a regular apprenticeship - just structured differently.

### 3. What expectations should we set of flexi-job apprenticeship schemes in providing a high quality experience for apprentices?

Given the pattern of employment a temporary worker will often have, the ability to extend the apprenticeship beyond 12 months would help allow for periods when the worker cannot participate in the apprenticeship, for example during breaks in employment when time is being spent finding the next suitable employment opportunity.

On the flip side for some temporary workers the choice to do the training aspect of their apprenticeship in chunks between assignments could be ideal. It is hard to work to a one size fits all model for temporary workers. Flexibility to support that working model is essential to bringing in more people who can benefit from this policy. Temporary work can be competitive, and employers may not be willing to engage workers if they are going to lose out on hours worked to allow workers to train during their assignment. This potential employer reluctance would be understandable on short-term or time sensitive assignments.

**4. What challenges and opportunities are relevant to flexi-job apprenticeship schemes achieving financial sustainability? How might they balance a fee-based model with other income streams?**

In terms of financial sustainability, the flexi-job apprenticeship scheme needs to be clear which parties are responsible for the funding of the training elements of the scheme. This is a particular challenge for our sector where an employment business may engage an apprentice and then supply them out to a series of clients. A joint funding model would be more sustainable and would allow for more companies to access and benefit from the scheme by dividing the cost between parties. If the employment business is solely responsible for funding the training, then this could be a huge barrier in them engaging workers in this manner. Likewise, if the client is responsible for covering the cost of the training this will discourage them from using apprentices over other types of temporary worker.

**5. Does the name flexi-job apprenticeship scheme accurately describe our vision for these organisations and they role they will play? Would you propose any alternative names?**

The scheme that has been proposed is based on an apprenticeship that allows a worker to work flexibly whilst completing their training. This means it is the worker that is flexible, and not necessarily the job. "Flexible worker apprenticeship" would be a more accurately descriptive term.

**6. Do you have any views on our proposals for portable apprenticeships, including on how portable apprenticeships and flexi-job apprenticeships schemes can complement each other?**

The overall vision for portable apprenticeships is good in that it allows workers to pause their apprenticeship where they are working in project-based industries. To be fully effective, this type of portable apprenticeship could also be applied to temporary workers in a variety of industries, where they have stop-start assignments and work patterns. Opening portable apprenticeships up to sectors beyond the creative industries and construction could allow more temporary workers in other sectors the opportunity to flourish and progress their careers as a result of this style of apprenticeship. Please see the responses to questions 2. and 3.

## **Operating framework for flexi-job apprenticeship schemes**

**7. Do you agree that we should create a register of approved flexi-job apprenticeship schemes?**

Yes. It is important that workers know they are working with a legitimate apprenticeship provider. Having an easily accessible register is a simple way to ensure workers can check that anyone purporting to provide a flexi-job apprenticeship is a legitimate provider. This register should be freely accessible online in order to make it as easy as possible for workers to verify their apprenticeship provider is an approved provider.

**8. What entry criteria do you think we should establish for admission to this register in order to ensure that approved flexi-job apprenticeship schemes meet our vision?**

Apprenticeship training providers wishing to be listed on the register should be able to demonstrate that they can provide a viable flexi-job apprenticeship model. As part of this they would need to have evidence that they can deliver the required training to an agreed standard or have a contract with an organisation that can. Organisations wishing to register as flexi-apprenticeship providers should also be able to evidence agreement from clients to accept workers on the flexi-job apprenticeship scheme. All of this information should be maintained digitally so it can be easily provided to potential flexi-job apprenticeship candidates. This way candidates can make informed decisions about whether an organisation is going to be able to adequately fulfil their apprenticeship.

**9. How do you think the performance and quality of approved flexi-job apprenticeship schemes should be monitored and assured after admission to the register?**

Organisations listed on the register should be subject to regular audits to ensure they are maintaining high-quality. This would apply to both the work and the training elements of the flexi-job apprenticeship. Organisations would need to provide evidence from a sample of the apprenticeships they have delivered to show that they are following the correct requirements and that training is being provided to a high standard. Worker testimonies would be a part of that.

**10. To assure the quality of flexi-job apprenticeship schemes, should schemes entry to the register set out the standards they can offer to apprentices? What process should we develop to enable schemes to change the standards they offer?**

Yes, organisations that wish to register to the scheme should provide information on the standards, type and level of training that is available to apprentices through their flexi-job apprenticeship. This transparency will ensure apprentices understand what they will gain from a scheme prior to signing up and will allow potential apprentices to find the scheme that is best suited to their needs. This information needs to be made available in a standardised, clear and easy to understand format.

Where the standard of apprenticeship provided by an organisation changes, they should be able to simply and efficiently update the details of their scheme on the register. Where organisations are updating their offering, this should be subject to the same level of checks as an organisation that is newly registering to ensure the quality of apprenticeships does not deteriorate over time.

**11. Do you have any concerns about the closure and withdrawal of the dormant register of ATAs?**

No. Removing the old register and replacing it with the flexi-job apprenticeship register ensures all providers will be listed in one place. This makes it easier for workers to check that their provider is registered correctly.

## **£7m fund for flexi-job apprenticeship schemes**

**12. Do you agree with the parameters we have proposed for how any funds awarded should be used?**

Greater clarity and detailed guidance will be needed to ensure businesses use funding appropriately. For example, 'costs for activities that will improve and assure quality' is one acceptable use of the funds, but it is not clear what would constitute an activity of this nature.

As funding cannot be used to cover the cost of training, there should be clear guidance about which party is responsible for fronting these costs. Whether the apprenticeship provider or the client where the apprentice is working could have an impact on the willingness of different organisations to use this scheme.

**13. Are there any capital costs that a new or expanding flexi-job apprenticeship scheme might require funding for?**

This will vary on an organisation-by-organisation basis, depending on their size and existing capacity to operate a flexi-job apprenticeship scheme. Likewise, if organisations are going to start providing their own training as part of a flexi-job apprenticeship they may need to invest in equipment, software, etc.

**14. Should there be a difference in how new or existing organisations are permitted to use the fund?**

Funding should be awarded consistently across all organisations. Different organisations will have different priorities for how the funding is used and it should be down to the organisation to decide those needs.

**15. Should any additional parameters to the fund be added to encourage employer engagement – for example, pledged levy funds or matched co-funding for set up or expansion costs?**

Ensuring employers are prepared and able to engage with the scheme is hugely important to the success of the flexi-job apprenticeship. Additional parameters to funding that encourage uptake of the scheme would help ensure more engagement with the scheme. Whether this is based on pledged levy funds or matched co-funding of costs is not the main issue. What is important is that whatever additional support is put in place is clearly explained and made accessible to all businesses.

**16. Do you have any views about the implications of the proposals set out in this consultation on people with protected characteristics, as defined in section 149 of the Equalities Act 2010? What evidence do you have on these matters? Is there anything that could be done to mitigate any impacts identified?**

Employers, have a duty under the Equality Act 2010 to make reasonable adjustments for disabled people and should be able to offer additional support during training. Whilst the Access to Work scheme can provide grants to pay for any specialist equipment and support costs in the workplace and government will pay for apprenticeship training for people aged 19-24 years with an EHCP (education, health and care plan), the additional flexibility offered by these proposals (especially if the REC suggestions made above - see questions 2 and 3 - are adopted) is likely to make the Flexi-Job Apprenticeships attractive to disabled people. Government should recognise and work with disability organisations to explore this potential.

For further information on this submission please contact:

Patrick Milnes, REC Campaigns Advisor

[patrickk.milnes@rec.uk.com](mailto:patrickk.milnes@rec.uk.com)

020 7009 2111

The REC is the voice of the recruitment industry, speaking up for great recruiters. We drive standards and empower recruitment businesses to build better futures for their candidates and themselves. We are champions of an industry which is fundamental to the strength of the UK economy. [Find out more about the Recruitment & Employment Confederation at www.rec.uk.com](http://www.rec.uk.com)

Registered in England

Company registered  
Number 3895053

Dorset House  
First Floor  
27-45 Stamford Street  
London SE1 9NT

020 7009 2100

[info@rec.uk.com](mailto:info@rec.uk.com)  
[www.rec.uk.com](http://www.rec.uk.com)