



## **Unite response to the DIUS Apprenticeships Bill**

**This response is submitted by Unite. Unite is the UK's largest trade union with 2 million members across the private and public sectors. Our members work in a range of industries including manufacturing, financial services, print, media, construction, transport and local government, education, health and not for profit sectors.**

### **Executive Summary**

- **Whilst noting that the Bill has potential to improve the skills and employment prospects of young people, Unite remains convinced that a fundamental opportunity for greater success is being lost;**
- **Unite would wish to see skills and training, including bargaining on apprenticeships, incorporated into the collective bargaining agenda;**
- **Unite is keen to see apprenticeship pay increased significantly and is committed to the removal of the exemption of apprentices from the National Minimum Wage;**
- **Access to the apprenticeship scheme should be extended to older workers;**
- **Take up of apprenticeships among women and BME groups should be encouraged and, where possible, a gender segregated labour market should be discouraged.**

## Introduction

1. Unite responded to the DIUS Consultation World Class Apprenticeships<sup>1</sup> and would like to reiterate some of the points made in that submission. Unite is well placed to contribute to this consultation with members in most industrial sectors and specifically membership in industries where apprenticeships have traditionally flourished.
2. Unite believes that the success of the apprenticeship scheme as a means of delivering a world class workforce as identified in the Leitch Review would be enhanced considerably if many of the points we made previously in our submission to the DIUS were included in the Apprenticeships Bill.
3. Whilst noting that this Bill has the potential to improve the skills and employment prospects of young people, indeed some of the proposals outlined are pivotal for the future success of UK plc, Unite remains convinced that a fundamental opportunity for greater success is being lost.
4. Unite is keen to work with employers to deliver the skills the economy needs to remain competitive in an increasingly volatile global economy and believes that the delivery of a skilled workforce is possible if trade unions could negotiate on skills and training with employers. Unite would therefore wish to see skills and training incorporated into the collective bargaining agenda.
5. The Building Services Engineering sector is a good example of how cohesive working has created a successful and dynamic approach to apprenticeships. A supplementary response to this consultation has therefore been included as an appendix in order to provide a clear assessment of how this Bill may inadvertently impact on this sectors present approach to apprenticeship provision. (see Appendix 1)
6. It is envisaged that by 2011 the total number of modern apprenticeships for 16-18 year olds in England and Wales will be 281,000.<sup>2</sup> Lord Leitch's recommendations of 500,000 apprenticeship places each year by 2020<sup>3</sup> is therefore ambitious and to fulfil this will require a huge effort by government, employers and individuals.
7. Trade unions are also well placed to contribute to the success of the apprenticeship scheme through the encouragement provided to employees by work based Union Learning Representatives and to work with the National Apprenticeship Service (NAS) to support workers through their training.

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<sup>1</sup> [http://www.epolitix.com/fileadmin/epolitix/stakeholders/Apprenticeship\\_DIUS\\_v1.pdf](http://www.epolitix.com/fileadmin/epolitix/stakeholders/Apprenticeship_DIUS_v1.pdf)

<sup>2</sup> Department for Innovation, Universities & Skills (DIUS), 'Ambitions Plan to Help Boost the Nation's Job Prospects', 16<sup>th</sup> November 2007.

<sup>3</sup> DIUS: World Class Skills: Implementing the Leitch Review of Skills in England, July 2007

8. Trade unions can also play a role in promoting apprentices through their work with the Sector Skills Councils. A number of sectors have adopted a Trade Union Action Plan into their Sector Skills Agreements and have signed up to support joint working with employers on training and the promotion of the role of ULRs in workplace learning.<sup>4</sup>
9. The Finance Section of Unite has recently endorsed a Skills Campaign to be rolled out across the sector. The Campaign will ensure that working with the FSSC and with a firm commitment to the Sector Skills Agreement, skills and learning are placed at the heart of the union's bargaining agenda.

### **Apprenticeship Pay**

10. The issue of apprenticeship pay remains a barrier to both applying for and completing an apprenticeship for some people and might in fact preclude those from lower income groups from considering an apprenticeship programme at all.
11. Unite would argue that the recent announcement by the Secretary of State for Innovation, Universities and Skills, John Denham, to increase apprenticeship pay from £80 per week to £95 a week in England, will do little to encourage uptake from those from less well off backgrounds and falls short of the TUC's call for a weekly wage of £110 per week.<sup>5</sup>
12. Unite does accept that the increase will have a marginal benefit to those in traditionally less well paid sectors, specifically women. However an apprenticeship will still pay considerably less and therefore be a less attractive option than an equivalent job, say in hairdressing, that is paying the minimum wage.
13. Unite is therefore keen to see apprenticeships pay more closely linked to the minimum wage. Unite believes that paying a decent wage combined with quality training opportunities will provide the incentive necessary to generate take up and improve upon present completion rates which although improving, up 20% since 2004, still stood at 63% in 2007.<sup>6</sup> Unite therefore remains committed to the removal of the exemption of apprentices from the National Minimum Wage.
14. Unite voiced concerns over the proposals laid out in the Education and Skills Bill which will increase the age which young people are required to stay in education or training to 18 years of age as it appeared to be using a 'stick' rather than a 'carrot' approach.
15. Unite, however, accepts that the proposals contained within the Education Bill provides the opportunity for young people to take up an

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<sup>4</sup> See FSSC Sector Skills Agreement. [www.fssc.org.uk](http://www.fssc.org.uk)

<sup>5</sup> TUC Decent Pay for Apprentices ESAD January 2008

<sup>6</sup> <http://www.lsc.gov.uk/providers/Data/statistics/sfr/>

apprenticeship to comply with this legislation. The opportunity of work combined with quality training and decent pay rates will make the apprenticeship route a very attractive proposition for young people.

### **Older workers**

16. In order to fulfil the skills gaps evident across a number of industrial sectors the Government must give consideration to removing the age limit on apprenticeships. According to the Leitch Review “over 70% of our 2020 workforce has already completed their compulsory education; and half of the working age population in 2020 is already over 25 years old.”<sup>7</sup> The UK faces a demographic challenge and the contribution that older workers can make to society and the wider economy will become increasingly important.

17. Unite therefore believes that access to the apprenticeship scheme should be extended to older workers. The Department for Employment and Learning in Northern Ireland has recently announced an extension of the apprentice scheme to anyone over the age of 16, previously only available to 16-24 year olds.<sup>8</sup> This should be replicated across the rest of the UK.

### **Diversity**

18. With female apprentices on average paid around 26% less than male apprentices<sup>9</sup> it is vital to encourage industrial diversity and move away from a gender segregated labour market. This would also involve encouraging uptake of apprenticeship places among people from black and minority ethnic groups who are presently underrepresented within the scheme.

**Graham Goddard**  
**Deputy General Secretary**  
**Unite the Union**

**Tom Beattie**  
**Head of Lifelong Learning &**  
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<sup>7</sup> Leitch Review of Skills Interim Report (page 8 para 18)

<sup>8</sup> <http://www.northernireland.gov.uk/news/news-del-040808-empey-makes-apprenticeships>

<sup>9</sup> Apprenticeship Pay: A survey of earnings by sector DFES Research Report 674, 2005

# (APPENDIX 1)

## Draft Apprenticeships Bill

### Consultation Response Form

The closing date for this consultation is: 8 October 2008

Your comments must reach us by that date.



**THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online or offline response facility available on the Department for Children, Schools and Families e-consultation website (<http://www.dcsf.gov.uk/consultations>).**

The information you provide in your response will be subject to the Freedom of Information Act 2000 and Environmental Information Regulations, which allow public access to information held by the Department. This does not necessarily mean that your response can be made available to the public as there are exemptions relating to information provided in confidence and information to which the Data Protection Act 1998 applies. You may request confidentiality by ticking the box provided, but you should note that neither this, nor an automatically-generated e-mail confidentiality statement, will necessarily exclude the public right of access.

**Please tick if you want us to keep your response confidential.**

Name Richard Clarke  
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Which of the following best describe you?

<input type="checkbox"/> Young person (under 18)	<input type="checkbox"/> Person (18 or over)	<input type="checkbox"/> Adult learner
<input type="checkbox"/> Professional working with young people	<input type="checkbox"/> Large employer	<input type="checkbox"/> Small/medium-sized employer
<input type="checkbox"/> Local authority	<input type="checkbox"/> Employer organisation	<input checked="" type="checkbox"/> Trade union
<input type="checkbox"/> Sector Skills Council	<input type="checkbox"/> Work-based learning provider/GTA	<input type="checkbox"/> Voluntary/community sector organisation
<input type="checkbox"/> College	<input type="checkbox"/> School	<input type="checkbox"/> Parent/carer
<input type="checkbox"/> Government Department/Agency	<input type="checkbox"/> Other (please specify)	

Please Specify:

**Trade Union (Specific sectoral response)**

This response is submitted as a supplementary appendix to the main Unite the Union submission.

It specifically concerns the Building Services Engineering sector, showing the Electrical Contracting Industry as a prime of example to demonstrate the cohesive nature of that sector, and its historically healthy and dynamic approach to apprenticeships.

This supplementary response outlines our concerns regarding the impact and implications that Bill may inadvertently have in its current draft form on that sectors successful approach to apprenticeship provision.

## General Questions

1 Do you have any comments about the draft Bill as a whole?

Yes

No

Comments:

We wish to convey the importance of long standing agreements and relationships in light of the forthcoming 2009 Apprenticeship Bill.

We believe that the chance to pursue apprenticeships to become Electricians, Plumbers and Heating Engineers will be very popular choices for school leavers.

In context, year on year, the Electrical Contracting Industry's largest Training Provider, JTL, established in 1991 by the parties to the JIB (Joint Industry Board for the Electrical Contracting Industry) being the ECA (Electrical Contractors Association) and Unite the Union (then EETPU), receives well over 30,000 expressions of interest for Electricians apprenticeships per year.

Of this number, 20,000 candidates make the next steps in applying, and take the aptitude and entry tests, of which 10,000 to 12,000 pass and are deemed suitable for employment and apprenticeship training within the industry.

Organisations like the JIB's and JTL act as an effective bridge between both employer and employee needs and aspirations within the industry. It is a system that works.

JTL then typically takes on 3000 apprentices from JTL per year within the current medium term industry economic and market conditions, JTL typically deliver 70 per cent of JIB apprenticeships. The other 30 per cent are delivered by other high quality industry approved training providers e.g. NG Bailey, a large JIB company who train their apprentices in house, and BEST who were established by the HVCA ,amongst others to numerous to list here.

Such Training Providers operate highly efficient 'matching' services, as identified in World-class Apprenticeships: Unlocking Talent, Building Skills for All. These have been developed and fine tuned over many years, and we believe for this sector, these matching services must not be taken over by the new National Apprenticeship Service (NAS). The industry has proven it can deliver, and can boast the best apprentice intake and completion figures in British industry.

It is an industry that others can learn from.

We hope that the Governments plans for apprenticeships brings many major contractors back into the fold of training apprentices, with we hope a jump in the intake of apprentice Electricians onto the JIB scheme back up to at least over 5,000 per year as a start. In recent years, in large part due to an over reliance on agency labour, commitment to training apprentices, with notable exceptions, has been sadly lacking from some major players within the industry.

Conversely, the commitment demonstrated by many Small to Medium sized Enterprises to the industry's apprenticeship training program is to be commended.

However, we must point out that Government must lead by example, and introduce an element of compulsion to train apprentices to make the aspiration of even larger increases in the numbers engaged a reality. Whilst we welcome incentives in helping employers financially, we do not believe these incentives alone will lure as many of them back to providing apprentice placements as may be believed.

As the biggest client in the total construction process, Government Procurement and wider Public Procurement must demand, as part of contract compliance, a quota and ratio of industry registered apprentices to qualified craftspeople on Government and Public projects, both large and small. This would introduce a very tangible incentive for contractors to train. We also believe that as most contractors tender for both public and private work, such a strategy would invariably positively have a knock on effect in private sector contracts.

Whilst the concept of the Bill endeavours to improve and raise apprenticeship provision in other industries and sectors, it can in no way be inadvertently used to lower the standards that already apply and are set within the Electrical Contracting Industry, and the wider Building Services Engineering sector, including the Plumbing Mechanical Engineering Services industry (PMES), and the Heating & Ventilation industry and its allied sub-sectors (HVACR).

The Government should recognise the uniquely cohesive and collaborative relationships that have existed for over a century between the industry bodies within the Electrical Contracting Industry, which has brought about the successful delivery of apprenticeships and industry wide recognised standards, UK wide industry and sector wide recognised grading and occupational disciplines. These standards and mechanisms of successful delivery have been built up over generations.

For instance, the JIB represents the benchmark of what an Electrician is expected to be, by facilitating the bringing together of all the threads and demands of employers, the union, technical bodies, inspection and safety bodies, training providers, colleges and the requirements set by the sector skills council into a tangible and cohesive set of standards, respected throughout UK industry and the world.

At 1<sup>st</sup> September 2007, there were 14,726 apprentices training under the JIB scheme.

Nationally, as of September 2008, including the Scottish JIB, the Electrotechnical Certification Scheme had in total 106,284 card holders on the system, including 55,102 Installation Electricians, and 18,275 apprentices registered, with the remainder being ancillary and allied electrical contracting disciplines (Cabling, Jointing, Highway, Data, Fire, Security etc). The industry independently knows who its people are, and knows its requirements to sustain itself. It has and continues to work. We need to keep it that way.

The industry must maintain this cohesive approach, structure and culture, whilst utilising the new legislation to further improve and develop its own established approach to training.

## **Recognition of the Electrical Contracting industry and wider Building Services Engineering within the process**

Provision should be made in any proposed legislation to support and endorse established means by which apprentices are registered through the agreed industry bodies, bearing in mind that the industry bodies themselves, through their Sector Skills Council SummitSkills, agree the standards necessary for the industry to operate.

The apprentice and operative registration processes used in Building Services Engineering, including the Electrotechnical, Heating & Ventilation and Plumbing Mechanical Engineering Services within Mechanical & Electrical link in all the relevant requirements demanded by the industry.

For instance, in Electrical Contracting, the extent and network of the collaboration within the industry is an example for others to follow, with real working together between organisations such as:

- SummitSkills – setting the Frameworks for technical and vocational training, qualifications to meet the National Occupational Standards required by the industry.
- Employers Associations – (ECA in England, Wales & Northern Ireland, and SELECT for Scotland) – representing the interests of employers within the industry
- Unite the Union – representing the interests of the workforce and apprentices within the industry and their hard won skills
- Joint Industry Board (JIB) – The Joint Industry Board for the Electrical Contracting Industry (JIB) designs the apprenticeship scheme to suit the industry, ensuring a consistent approach to the actual delivery of the apprenticeship, to the jointly agreed high standards laid down by SummitSkills in the appropriate Frameworks and National Occupational Standards, through to wider standards and Skills Competence Accreditation via ECS, Welfare and Benefits, established standards and agreed terms and conditions for operatives, and apprentices in training.
- JIB apprenticeship scheme – ensuring a homogenous system of actual delivery across the industry that is monitored, measured and checked (including employers and union representatives conduct regular monitoring visits on colleges to ensure the quality of provision required is adhered to)
- ECS Skills competence accreditation, Registration and Grading through the Electrotechnical Certification Scheme (ECS), which is CSCS affiliated, as supported by Government, Clients and the Major Contractors Group. This is effectively the ‘licence to work’ within the sector, and the goal of being eligible to apply for the gold ECS (CSCS affiliated) is ultimately the goal of every apprentice, proving their level of skill nationwide on any site as they enter the wider world of work.
- Training Providers – e.g. the Jointly established JTL who deliver 70 per cent of the 12,000 JIB Electrotechnical Apprenticeships
- Technical, Inspection and Safety bodies – the parties invariably sit on the bodies like

the IET (Institute of Engineering Technology) who as part of their remit produce and publish the BS7671 IEE Wiring Regulations, The Electrical Safety Council who promote the interests of the consumer and electrical safety, the NICEIC, who are the largest inspection body in relation to the quality and safety of workmanship on Electrical Installations.

- Strong UK wide relationships exist between the parties UK wide, whereby the equivalent organisations in the Engineering Construction industry (NJC, ECIA, ECITB) and devolved institutions in Scotland (SELECT, SJIB, SECTT) and Northern Ireland (ETT) work closely and alongside those in England and Wales to warrant that each nation maintains consistency of training and qualification standards, ensuring straightforward portability of qualifications for specific trades and occupations across UK national, and indeed, International boundaries.
- Awarding bodies – QCA, SQA, City & Guilds, EAL etc, JIB joint awarding body

We do not claim that the above organisations all agree all the time, but what has developed is a cohesive approach that has seen the industry develop into the world class example it is today.

We will therefore be seeing to convene a meeting in the near future with the Minister and Civil Servants, together with the industry stakeholders in the electrical contracting industry apprenticeship system, to discuss the requirements and nature of the industry, and convey our needs in more detail.

We also propose that due to the extensive history, success and experience of the Electrical Contracting Industry in the field of apprenticeships, that an experienced envoy is drawn from the industry as the apprenticeship agenda moves forward.

Indeed, as we move forward, the wider built environment in the general construction and building trades also have similar relationships, notably ConstructionSkills (CITB), and the ECITB in Engineering Construction.

We would also suggest, in line with above, that the Governance of the new proposed National Apprenticeship Service has representation from within the Electrical Contracting Industry, so that the industry can share it's approach and best practice with wider UK industry.

Electrical Contracting and Building Services in the in the UK are World Class, we need to maintain and build upon that success to guarantee the future stability of our infrastructure into the future. Apprenticeships are a key component within that process.

2 Does the Bill provide the legislative framework to support the expansion and strengthening of apprenticeships as envisaged in World-class Apprenticeships?

Yes

No

Not Sure

Comments:

We agree with the concept of the Bill, but we have serious reservations regarding the implications and impact of the measures on the Building Services Engineering sector, and wider construction and building sectors, as highlighted in our comments in question 1 above. We also refer you to the main Unite response to the DIUS Apprenticeships Bill.

We also refer you to the Unite response to the Department for Innovation, Universities & Skills Consultation: World-class Apprenticeships: Unlocking Talent, Building Skills for All.

In regard to realising the potential for expanding apprenticeships, we bring to your attention to the inadequate provision in the Bill for Adult Apprenticeships.

#### **Adult Apprenticeships**

Age should not be a barrier to learning. There are many adults, particularly those with engineering backgrounds from manufacturing, which has seen a massive haemorrhage in jobs and skills 'lost', who could retrain, those skills could be recaptured. Such individuals would jump at the opportunity of progressing into a new profession.

The employers share similar views, In Electrical & Mechanical Contractor on 03/10/2008, Iain Macdonald, head of education and training at the ECA said:

“...Notably the Bill states that three-quarters of planned funding will be available for 16 to 18-year-olds. It is the ECA's belief that training adults and up-skilling talent that already exists within the industry is key to its future and will also go some way to addressing the immediate skills crisis. We urge the government to go further with plans to support adult training.”

### **This section covers Apprenticeship Certificates (Clauses 1-6)**

These clauses establish the conditions that apply for the awarding of certificates to persons who have met the requirements of a recognised apprenticeship framework.

3 Are the arrangements detailed in this section right?

Yes

No

Not Sure

Comments:

The stakeholders in the Building Services Engineering sector, Employers Associations, Trade Union, Joint Industry Boards, Industry approved Training Providers and Organisations, Institutes and Technical bodies and have embraced and been supportive of our Industry's Sector Skills Council, SummitSkills, since it's inception and bringing together of much of the remit formerly carried out by the former National Training Organisations being BPEC, ESTTL and NET.

The success of SummitSkills, including the development Frameworks and National Occupational Standards in full consultation the industry cannot be understated. We therefore call upon the Government to ensure that this legislation is not detrimental, whether deliberately or inadvertently, to successful sector skills councils, in regard to their remits and their financial income streams.

### **This section covers Apprenticeship Frameworks (Clauses 7-10)**

These clauses of the Bill define and set out the procedures for the issue of apprenticeship frameworks. Apprenticeship frameworks are currently developed and approved by Sector Skills Councils on behalf of the Secretary of State according to the apprenticeships blueprint. The frameworks are high level curricula for an apprenticeship in a specified career. As specified in the 'blueprint' the frameworks typically include an integrated programme which contains a competence element; a knowledge element; transferable or functional skills; and employment rights and responsibilities. Frameworks require a person to obtain a qualification such as an NVQ at Level 2, 3 or 4 in a particular subject to meet the competence and knowledge elements, as well as functional skills in English and maths.

4 Are the arrangements detailed in this section right?

Yes

No

Not Sure

Comments:

Please refer back to our answer in question 3, which gives our support to the Sector Skills Council.

Again, we agree with the concept of the Bill and what it sets out to achieve, but we have serious reservations regarding the implications and impact of the measures as highlighted in our comments in question 1 above, and the main Unite response to the DIUS Apprenticeships Bill.

**This section covers specification of apprenticeship standards (Clauses 11-15)**

These clauses set out requirements to be placed on the LSC to produce a specification of apprenticeship standards to which all frameworks must conform if they are to be issued. The specification could contain for example requirements as to competence and knowledge based elements, transferable skills, employment rights and responsibilities, clear progression routes and minimum off-station learning time.

5 Are the arrangements detailed in this section right?

Yes

No

Not Sure

Comments:

The content of the apprenticeship agreement should expressly define explicit / expected time frames for the term of the apprenticeship, enabling a reference point for clear career progression and completion procedure, and the contract of employment should of course lay down the terms and conditions of employment.

In regard to Building Services Engineering, the national agreements (Electrical JIB, Plumbing JIB for PMES, Heating & Ventilation JIC, set down what the industry considers to be the correct terms and conditions of employment for the relevant trades, which more than comply with the national minimum wage etc, and also incorporate agreed allowances and benefits etc.

The agreements incorporate procedures at both company and industry level for dealing with any disputes concerning the apprenticeship / training and other employment matters, and as described, industry determined schemes to ensure the proper delivery of the apprenticeship and framework from the point of commencement to the final completion of the apprenticeship.

This level playing field of fairness for employers and employees must not be eroded or undercut by those who do not sign up to the expected standards, which would effectively give them an unfair competitive advantage if operating lesser standards, and paying lower rates and benefits etc.

Therefore in regard to apprenticeship agreements, standards and Terms and Conditions of employment, where an industry has established standards and agreed terms and conditions for apprentices in training, these must be adhered to. The legislation must make provision for this.

## This section covers Apprenticeship Agreements (Clauses 16 – 20)

The apprenticeship agreement will be a contract entered into between the employer and the apprentice and is central to the apprenticeships programme. It should set out both the on-the-job training and the learning away from the workstation that will be delivered; make clear what job role an apprentice will be qualified to hold upon completion; and stipulate the supervision that an apprentice will receive throughout the period of the Apprenticeship.

6 Are the arrangements detailed in this section right?

Yes

No

Not Sure

Comments:

### **Clause 18 - Variation of an apprenticeship agreement**

We are concerned that the wording of this clause appears to make it simple for an employer to ‘vary’ and could in effect terminate the apprenticeship before it’s successful completion by simply informing the apprentice of this in writing, with no penalty to the employer, we see no reference to the right of the apprentice to challenge this, This wording needs a thorough rethinking.

### **Clause 19 - Status of an apprenticeship agreement**

Firstly this excludes an apprenticeship agreement from being a “contract of apprenticeship”, and only defines it as a “contract of service”.

We believe this approach demeans the ethos of what is meant by apprenticeship. The apprenticeship agreement must form a contract of apprenticeship in law, to ensure that safeguards are built in so that the apprentice does not suffer a loss of training opportunity and future career without just cause.

To terminate an apprenticeship agreement, (e.g. failure to achieve the appropriate standard, redundancy, etc) meaningful and clear procedures should be followed.

The appropriate employer, apprentice, parent/guardian, Training Organisation and Trade Union representative would be involved in the procedure, which should incorporate a robust internal then industry appeals process.

In situations of redundancy, again clear procedures should apply, and every endeavour to secure suitable alternative employment, with a transfer of the apprenticeship to a new employer should be a fundamental principle.

**This section covers Duties of Learning and Skills Council and Secretary of State (Clauses 21 – 22)**

These clauses make provision for a series of new duties incumbent on the LSC and place certain powers and responsibilities upon the Secretary of State to secure the provision of services in connection with the apprenticeships programme.

7 Are the obligations we are placing on the LSC right?

Yes

No

Not Sure

Comments:

Again, we agree with the concept of the Bill and what it sets out to achieve, but we have serious reservations regarding the implications and impact of the measures as highlighted in our comments in question 1 above, and the main Unite response to the DIUS Apprenticeships Bill.

8 Are the obligations we are placing on the Secretary of State right?

Yes

No

Not Sure

Comments:

Again, we agree with the concept of the Bill and what it sets out to achieve, but we have serious reservations regarding the implications and impact of the measures as highlighted in our comments in question 1 above, and the main Unite response to the DIUS Apprenticeships Bill.

**This section covers careers education (Clause 23)**

This clause amends section 43 of the Education Act 1997 which requires state secondary schools to provide all pupils with a programme of careers education.

9 Are the arrangements detailed in this clause right?

Yes

No

Not Sure

Comments:

Careers education must be of high quality and accurate in its content, with the full input and consultation of the relevant industry bodies (employer, union, training agents and technical bodies) and the Sector Skills Council.

It should include information on the realities of the job, the content of the training, level of aptitude required to enter the job, employment rights, the industry standards and industry bodies, and the purpose of and access to Trade Unions.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

**Please acknowledge this reply ✓**

Here at the Department for Children, Schools and Families we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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All UK national public consultations are required to conform to the following standards:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

Further information on the Code of Practice can be accessed through the Department for Business, Enterprise and Regulatory Reform Website:  
<http://www.berr.gov.uk/files/file44364.pdf>

Phil Turner - DCSF consultation Co-ordinator 01928 794304

**Thank you for taking time to respond to this consultation.**

Completed questionnaires and other responses should be sent to the address shown below by 8 October 2008

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