



# Traineeships - TUC response to Discussion Paper

Supporting Young People to develop the skills for  
Apprenticeships and other sustained jobs

The TUC is pleased to respond to the discussion paper on “Traineeships”. The TUC welcomes any initiative which aims to remedy the significant problems caused by youth unemployment.

Over the last quarter youth unemployment rose by 1,000 to reach 957,000. Long-term youth unemployment is too high. Overall, the number of 16 – 24 year olds not engaged in work or learning remains well over a million. Beneath these headlines, around 260,000 young people have been out of work for over a year, doubling since 2008.

Youth unemployment is not just a strain on the economy. It causes a myriad of knock on problems, both to the individual (lower future earnings; welfare dependency; dependency on high interest short term loans<sup>1</sup>; and depression) and wider society<sup>2</sup> (wasted potential; lower productivity; increased crime<sup>3</sup>, and anti social behaviour).

We acknowledge that traineeships are an opportunity to help bridge the gap for young people without the requisite skills needed to undertake an apprenticeship or find employment. The TUC and unionlearn have worked with affiliates to promote the use of, and raise the quality of apprenticeships. The TUC welcomes a scheme which will support young people make the transition to Apprenticeships. Raising the skills of young people prior to taking up an apprenticeship will ensure that the quality of existing apprenticeship frameworks does not deteriorate.

The TUC welcomes the fundamental premise of the discussion paper that Traineeships should be a vehicle to deliver more high quality apprenticeships and to help young people into sustainable employment. Whilst we broadly support the concept of a traineeship, certain criteria need to be met to ensure that they fulfil their purpose of providing young people with the skills needed to start an apprenticeship or find secure, quality employment. These criteria can be briefly summed up as:

- Traineeships should not displace existing jobs
- There should be a mandatory payment of some kind for all Trainees
- Traineeships should be a voluntary programme and sanctions relating to benefits should not be imposed on those not participating
- A guaranteed job interview would incentivise young people to undertake Traineeships

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<sup>1</sup>[http://www.stepchange.org/portals/0/Documents/media/reports/additionalreports/CCCS\\_Consumer\\_Debt\\_and\\_Money\\_Report\\_Q1\\_2012.pdf](http://www.stepchange.org/portals/0/Documents/media/reports/additionalreports/CCCS_Consumer_Debt_and_Money_Report_Q1_2012.pdf)

<sup>2</sup> [http://www.cesi.org.uk/sites/default/files/event\\_downloads/ACEVO\\_report.pdf](http://www.cesi.org.uk/sites/default/files/event_downloads/ACEVO_report.pdf), Chapter 1.

<sup>3</sup> <http://www.princes-trust.org.uk/PDF/Princes%20Trust%20Research%20Cost%20of%20Exclusion%20apr07.pdf>

- A core element of Maths and English training, tailored to the needs of the potential Trainee is essential
- Work experience placements must offer the Trainee a genuine opportunity to develop new skills.
- The opportunity for progression/smooth transition to an apprenticeship must underpin any Traineeship
- Funding should be channelled to providers providing they can guarantee the Trainee a high quality work experience placement with an employer

**Question 1: What are your views on the elements that are essential for an effective programme to support young people to prepare for Apprenticeships and other jobs?**

The TUC believes that an effective Traineeships programme should take into account the considerations below:

- Traineeships should not be used to; or have the effect of; displacing existing jobs or job opportunities which would have naturally arisen but for the use of traineeships. With longer duration work placements there is a genuine risk that traineeships will be used by unscrupulous employers to cut costs and have access to cheap labour. This would have a detrimental impact on the individual's learning experience and the wider economy.

The TUC works with affiliates to promote and raise the quality of apprenticeships. Through this work we have uncovered unscrupulous practices carried out by training providers and employers such as advertising low-paid apprentices to employers via mail-shots. To ensure high quality Traineeships and prevent them being touted as cheap labour, lessons learned from the Apprenticeships programme need to be taken on board and appropriate safeguards put in place.

- A Traineeship programme should enable the trainee to make the transition into employment. Any skills development, learning opportunity or training which forms part of the traineeship should include elements which are relevant to local employment opportunities but there should also be a recognition of the importance of young people acquiring qualifications that support them to have access to vacancies in the wider labour market.

Industrial partnerships (introduced under the Employer Ownership Pilot), LEPs and SSCs may be one route to develop and deliver Traineeships. This will ensure that actual jobs exist for young trainees upon completing their Traineeships. These bodies should all have strong employer and trade union voice, allowing a comprehensive sectoral skills strategy to be developed. Trade unions have a solid track record of working in partnership with employers to improve both the quantity and quality of Apprenticeships. This work could be rolled out to the Traineeship programme.

- The opportunity for progression should underpin any Traineeship, whether this is progression to an Apprenticeship or progression to employment with continuing training in place. To enable progression a Traineeship, where possible, should involve a nationally recognised qualification or progress towards achieving such a qualification (e.g. QCF units). This qualification could make up one of the modules of an Apprenticeship framework enabling the trainee to progress onto an Apprenticeship. Links must be developed between the Traineeship and the Apprenticeship so that skills developed by a Trainee are recognised under any future Apprenticeship.
- The health and safety of Trainees participating in the scheme is paramount. Trainees are less likely to have an understanding of the health and safety risks in the workplace. People are much more likely to be injured in their first six months of starting a job and for young people commencing their first job the figure is even higher. Every year 5,000 under 19 year-olds are seriously injured in the workplace and several are killed.

Anyone receiving relevant training (work experience provided as part of a training course or programme, or training for employment or both) should be treated as an employee for the purposes of health and safety legislation. If the trainee is under 18 there is a specific legal requirement to protect them from any possible risks arising from their lack of maturity or experience and a separate risk assessment must be carried out before they start work or training.

The HSE has published some useful guidance<sup>4</sup> for employers regarding their obligations under health and safety legislation. To ensure the health and safety of young Trainees, the TUC would recommend distributing this guidance alongside any information about Traineeships.

- Too many young people lack level 2 functional skills relating to numeracy and literacy. We welcome the fact that English and Maths learning is part of the core offer of Traineeships. This learning contains the fundamentally important underpinning skills to enable those in work to function effectively and progress themselves. This should not be a bolt on but seen as an opportunity for young people to engage with English and Maths in a meaningful way. Learners should be assessed and learning tailored to their needs. English and Maths needs to be delivered in relevant and vocational contexts with access to nationally recognised accreditation including pathways to Level 2 in Functional Skills or GCSEs. ESOL

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<sup>4</sup> <http://www.hse.gov.uk/youngpeople/resources.htm>,  
<http://www.hse.gov.uk/youngpeople/workexperience/placeprovide.htm>,  
<http://www.hse.gov.uk/pubns/indg364.pdf>

support needs to be provided free of charge to those who need English language support.

- Work experience placements should be an essential element of a Traineeship, but they must give young people a positive experience of work. Work placements play an important role in developing employability skills and providing an experience of the workplace:
  - Work placements must be high quality and be relevant to the aspirations/future employment prospects of the trainee. A CBI survey revealed that 32% of young people found that work experience did not match their interests<sup>5</sup>.
- The TUC welcomes the reference in the discussion paper that consideration will be given to paying trainees undertaking Traineeships. Trainees on work experience placements should be paid at least the appropriate NMW rate unless they are clearly limited to short periods of work experience.
- To ensure a Traineeship is designed to match the aspirations of the Trainee and useful in helping source work, it is essential that young people undertaking a Traineeship are able to receive face-to-face career guidance. Please see question 6 below for further details as to what career guidance should entail.
- Financial support packages should be put in place to enable young people to participate in the Traineeship programme. Unionlearn, the Learning and Services arm of the TUC has recently commissioned research which involved facilitating three focus groups of young people. In addition to this unionlearn recently hosted a “Voice of Apprentices” event. A recurring issue that emerged from these groups was that the escalating cost of transport was prohibitive. The TUC is concerned that if this issue isn’t addressed by the Traineeship programme young people could be dissuaded from taking participating.

The government must ensure that in-work benefit rules are not a barrier to participation in Traineeships, as many participants will need to claim benefits to supplement the wages or allowances they receive. If the government does not mandate payment of a wage or allowance participants will need to claim out of work benefits; in this case the very least the government must do is to make sure that the 16 hour rule does not stop participants claiming JSA, ideally participants should be eligible for a youth credit offering a regular payment that would be sufficient for basic needs, but conditional upon participation in education and/or job seeking.

- The details of a Traineeship programme must be well promoted and explained to employers. Unionlearn’s research into employers’ perspectives on recruiting young people revealed that even large employers

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<sup>5</sup> CBI, 2007. Survey of 1,034 young people following placement, aged 14-16

with dedicated HR professionals found the wide range of youth unemployment initiatives difficult to keep up with, in addition to the complexities around the funding arrangements for these initiatives.

These concerns were echoed in the recent LGA report, Hidden talents II LGA report<sup>6</sup>. According to the report, the CBI pointed out when commenting on the Work and Pensions Select Committee report on the Youth Contract, 2012 that there are “47 initiatives that incentivise firms to hire and train young people, a level of complexity that creates a genuine barrier”. For this reason it should be very clear to employers from the start that Traineeships are primarily a pathway to support young people onto high quality apprenticeships and not a new labour pool to draw from in to undertake menial and low-wage tasks that employers find difficult to recruit for in the mainstream labour market.

- It is imperative that there is an emphasis on equality and diversity within Traineeships. Especially if one of the main aims of Traineeships is to facilitate progression onto an Apprenticeship.

Around 50% of work experience placements are sourced directly by pupils or their families. Provided traineeships are designed with a view to equality of access then they could enable young people previously excluded from undertaking work experience to participate in work placements. This is supported in the government’s 2011 Social Mobility Strategy which identified work experience as a means of helping people from disadvantaged backgrounds optimise their chances of accessing professional employment.

Gender segregation remains a huge problem with only 3 per cent of engineering apprentices accounted for by female participants compared to 92 per cent of hairdressing apprentices. This is one of the reasons for an overall gender pay gap of 21 per cent, but even within the same sector women are being paid less: 61 per cent of apprentices in the retail sector are female but they are paid 16 per cent less than male retail apprentices. Recent research by unionlearn reinforces these earlier findings, showing that occupations with the highest-paid apprenticeships tend to have a much lower ratio of female apprentices. For example, the research showed that there were no women apprentices in the occupation with highest average apprenticeship pay, extractive and mineral processing

Black and minority ethnic (BME) communities also face huge barriers. For example, while 18- to 24-year-olds from BME communities account for 14 per cent of this age group in the overall population, they account for less than 8 per cent of apprenticeship places. Although different levels of awareness of the apprenticeship programme may play a part in this, the race discrimination affecting black workers more generally in the labour market is also likely to be a key factor.

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<sup>6</sup> [http://www.local.gov.uk/c/document\\_library/get\\_file?uuid=fe612120-4c27-4d97-a855-74244b511410&groupId=10171](http://www.local.gov.uk/c/document_library/get_file?uuid=fe612120-4c27-4d97-a855-74244b511410&groupId=10171)

Disabled people face similar barriers, with trends suggesting a worsening of the situation.

Improving equality of access to Traineeships would have a knock on effect to ensuring that those who progress on to Apprenticeships would represent a more diverse group. However, alternatively, there is a danger that Traineeships could exacerbate equality and diversity within apprenticeships (e.g. a higher incidence of young BME people, who previously might have been recruited to apprenticeships, finding that they are now only offered a Traineeship). It is crucial that the government takes pre-emptive action to prevent a situation where the introduction of Traineeships leads to a situation where the proportion of specific disadvantaged groups (BME, disabled etc) on Apprenticeships actually worsens.

Unions could work with employers to ensure that Traineeships are designed with a view to improving equality and diversity. The mentoring and support that union representatives could provide to Trainees in the workplace may also ensure that Trainees facing particular barriers are given support.

### **Question 2: Should a guaranteed interview be part of the core content of a Traineeship?**

The TUC believes that a Traineeship should involve a guaranteed interview at the end of the programme. This would incentivise young people to participate in the programme and may lead to increased youth employment. Participating in the interview process would also give the trainee a valuable firsthand insight and experience of the interview process.

It would also give the employer an opportunity to reflect on its recruitment and selection procedures and revise accordingly. Unionlearn, the learning and services arm of the TUC has recently commissioned the University of Warwick to conduct research into the recruitment and selection strategies of employers and how these impact on young people. The University of Warwick's preliminary findings have found that traditional competency based interviews may disadvantage young people as these types of interviews rely heavily on giving evidence based examples.

Therefore it may be that the Traineeship could be designed with a view to promoting a new interviewing strategy that will engage young Trainees and afford them every opportunity to highlight their skills to prospective employers.

### **Question 3: What makes work placements high quality and effective?**

Work experience can be an invaluable tool for assisting young unemployed people.

Since 1989, a scheme known as Work Trials has been available for people who have difficulties getting jobs (such as lone parents, long-term unemployed and disabled people). One of the key characteristics of Work Trials is that they are voluntary and there is good evidence that Work Trials have made a difference to employment opportunities for people who would otherwise find it difficult to get jobs and that people who had taken part thought their Work Trial had given them an advantage in getting a job.

Whilst the TUC recognises that Traineeships are in the early stages of development there is ambiguity surrounding the proposed design of work experience placements. In particular, the length and number of work placements that would be undertaken by a trainee. The TUC has concerns that work placements of longer durations could lead to poor quality work placements due to the increased effort needed by the employer. There are also concerns that Trainees could displace the jobs of existing workers if they are able to work for an employer for an extended duration.

However, providing safeguards are put in place to ensure that Trainees on work experience placements are paid, not displacing existing jobs and are receiving high quality work experience placements, then placements of a longer duration would be beneficial to Trainees and would equip them with employability and workplace skills which will help them make the transition into employment.

Previous government programmes for unemployed people and some other benefit claimants involved “work experience”. This may not be substituting for the work of other workers but still has all the other characteristics of a job. Unions are especially concerned about abuse of work experience where unemployed people are required to do a few days’ work for no pay, with no training and no expectation of an interview, let alone a job offer. When this happens, we strongly suspect that unemployed people are just being used to provide unpaid labour and it is very unlikely that it does anything to help them get real jobs.

The TUC is also opposed to work experience that is imposed as a ‘penalty’ for becoming long-term unemployed. There is no evidence that it helps long-term unemployed people to get jobs and employers are not impressed by experience of this sort of scheme on an applicant’s CV. Earlier this year campaigns by unions and unemployed people and concerns raised by employers forced the government to concede that participation in the “Work Experience” programme (which accounts for half the places in the Youth Contract) should be entirely voluntary. There is now some early evidence that this programme improved the employment opportunities of some jobless young people, but significant concerns remain about the misuse of the programme by some employers and it is still too early to tell how useful the programme will be in the longer-term.

Effective work placements need to be properly planned and matched to the needs and aspirations of the trainee. They need to involve the Trainee in a range of meaningful tasks which develop new skills and build on their existing strengths. The aspirations of the Trainee also need to be balanced with the reality of vacancies in the local labour market.



Specifically, the TUC believes that an effective work placement should involve the following core components:

- Compliance with all minimum health and safety legislation
- Regular meetings pre and during the work experience placement to ensure the work placement aligns with the Trainee's aspirations
- An evaluation exercise to provide feedback to the Trainee, identify areas of strength, areas for improvement and to allow the employer to improve future work experience placements
- Inclusion and day to day support in the workplace. This would include making sure there is a designated member of staff assigned to the trainees. This designated member of staff would be on hand to take the trainee to lunch and to explain general workplace practices, for example.
- A trainee should be properly supported in the workplace. Union representatives and in particular, Union Learning Representatives, who have experience in supporting and mentoring colleagues may be well placed to do this. Health and safety reps and other union reps will also be able to work with employers to ensure that Trainees are safe and supported in the workplace. Unions can provide the confidence and trust required for working people, particularly those from disadvantaged backgrounds, to engage with and benefit from learning that meets their diverse needs.

21% of young people undertaking work experience say that their host employer was not well prepared for their placement<sup>7</sup>. There is a danger that unless the Traineeship programme publishes some guidance relating to quality work placements then 1 in 5 young people might not benefit from the well intentioned Traineeship programme.

The TUC believes that the guidance set out by the Department for Education “Work experience made simple: good practice” covers much of the above and would be a useful document to highlight as existing government guidance in this area.

**Question 4: Are you aware of other evidence from existing programmes that demonstrates the effectiveness of these elements?**

There are numerous examples listed in the recent LGA report, Hidden Talents II:

[http://www.local.gov.uk/c/document\\_library/get\\_file?uuid=fe612120-4c27-4d97-a855-74244b511410&groupId=10171](http://www.local.gov.uk/c/document_library/get_file?uuid=fe612120-4c27-4d97-a855-74244b511410&groupId=10171)

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<sup>7</sup> YouGov for Edge, 2010 Survey of 1,123 young people who had a placement, aged between 11 and 24.

**Question 5: How could Traineeships best complement what is already available for young people, simplify our offer and avoid unnecessary duplication?**

The proposed elements of Traineeships which will complement existing best practice and add value are guaranteed interviews, studying Maths and English and high quality work experience schemes.

Through promoting the benefits of engaging with young people and putting in place incentives to encourage employers' participation, Trainees will be able to undertake a well rounded programme which ensures they receive workplace skills, recognised by employers which will help them find work.

In summary the three distinctive features of a Traineeship, which set it apart from other youth unemployment schemes, are:

- A guaranteed job interview
- Maths and English provision tailored to the needs of the Trainee
- High quality work experience placements

**Question 6: What are your views on the proposed Traineeships model?**

The TUC believes that voluntary participation in employment programmes should be the norm. Voluntary participation means that participants are likely to be motivated to get the most out of a scheme. More importantly, voluntary participation is the best quality control possible – low quality schemes will struggle to recruit. It exploits the people who take part by paying them much less than the minimum wage. It is unfair to other workers because it threatens their jobs and pay rates. It is unfair to other businesses if their competitors are being subsidised by the government in this way.

**Are the core components right?**

The TUC believes the core components of a Traineeship should include:

- Employability skills
- Maths and English
- Work experience placements (should make up at least half the length of any Traineeship)
- Careers guidance
- Vocational qualifications to facilitate progression

The TUC is supportive of a traineeship which enables young people to achieve a basic attainment in Maths and English. We welcome the fact that English and Maths learning is part of the core offer of Traineeships. These are the fundamentally important underpinning skills which enable those in work to function effectively and progress themselves. This element should not be a bolt

on but seen as an opportunity for young people to engage with English and Maths in a meaningful way. Learners should be assessed and learning tailored to their needs. English and Maths need to be delivered in relevant and vocational contexts with access to nationally recognised accreditation including pathways to Level 2 in Functional Skills or GCSEs.

This is further highlighted by Professor Alison Wolf, in her recent report:

*“English and Maths GCSE (at Grades A\*-C) are fundamental to young people’s employment and education prospects. Yet less than 50% of students have both at ...age 15/16 and at age 18 the figure is still below 50%... The result is that many of England’s 14-19 year olds do not, at present, progress successfully into either secure employment or higher-level education and training. Many of them leave education without the skills that will enable them to progress at a later date.”* – Wolf Report

Work experience placements should be a core component of the Traineeship programme. According to research commissioned by the UKCES<sup>8</sup>:

- Young people strongly believe that work experience helps to deliver their employability skills. This view is shared by employers. Provided that work placements are structured properly and effectively planned (please see the answer to Q3) they can be a valuable tool to help young people acclimatise to the workplace.

### **Is the balance between flexibility and specification correct?**

A Traineeship programme should be flexible and able to adapt to the needs of the Trainee. For example, the TUC recognises that a Trainee enrolling on to the programme may already have a basic understanding of Maths and English and previous work experience. This Trainee’s needs would differ from a young potential Trainee with no qualifications and no work experience. A Traineeship should therefore be tailored to the needs of the individual.

However there are some of the add on/flexible components that the TUC believes should be core components of any Traineeship.

#### *Vocational qualifications*

As stated above, the opportunity for progression should underpin any Traineeship, whether this is progression to an Apprenticeship, or progression to employment. To enable progression a Traineeship should involve progress towards acquiring a nationally recognised qualification or attainment of units that make up vocational qualifications. This qualification could make up one of the modules of an apprenticeship framework so that the trainee is able to progress onto an apprenticeship. Links must be developed between the Traineeship and the Apprenticeship so that skills developed by a Trainee are recognised under any future Apprenticeship

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<sup>8</sup> [http://www.educationandemployers.org/media/15807/work\\_experience\\_report\\_april\\_2012\\_.pdf](http://www.educationandemployers.org/media/15807/work_experience_report_april_2012_.pdf)

The TUC believes this will lead to an increased take up in Traineeships as young people will be incentivised to participate in a scheme where transferable qualifications can be obtained.

#### *Careers guidance*

Young people need access to high quality impartial career guidance as a compulsory component of the Traineeship model in order to be able to make informed choices about their careers, learning and work options. It is essential that young people undertaking a Traineeship are able to receive face-to-face career guidance. Most of the time young people have a preference for face-to-face interactions so this should be a core component of the model.

To ensure a high quality Traineeship and to effectively support young people in making the right career or learning choices there should be a requirement that independent and impartial careers advice and guidance is only provided by quality assured organisations. Without stipulating a quality assurance requirement there is a risk of poor quality provision which in turn could lead to damaging consequences for young people's future prospects and the reputation of Traineeships.

There is a substantial body of evidence to support that young people need access to accurate, high quality, impartial information about their options post-16 and what needs to be done to enter their chosen career. Many young people identify the lack of information about choices available to them as a major barrier to their participation post-16.

Making independent, impartial careers guidance a compulsory component of the Traineeship model could help reduce the dropout rates amongst apprentices by ensuring that young people are made aware of all their career options and choices from career professionals prior to entry. Although face-to-face interventions may cost more than other channels, young people often find them more inspirational and they represent good value for money compared to the cost of undergraduate and apprenticeship drop out.

It is crucial that careers advice and guidance is provided by qualified careers guidance professionals. There is concern that without the proper infrastructure focused on young people, there will be great variability in the quality of careers guidance offered. Although the National Careers Service has been reframed as, in effect, a careers service for adults, consideration should be given to the role the National Careers Service could play in delivering the face-to-face careers guidance component of the Traineeship model.

#### **Question 7: What are your views on the right age range for the programme (Paragraph 21)?**

The TUC agrees that the programme should mainly be focussed on 16 – 24 year olds, as that is the group that lacks clear pathways from education to work.

As we suggested in the opening paragraphs, any initiative aimed at helping the cohort of young unemployed is welcome due to the devastating effects on both the individual and society.

**Question 8: What are your views on the right duration for the programme (Paragraph 24)?**

The TUC agrees with the proposed duration set out in paragraph 24. As the discussion paper suggests if it becomes possible for a trainee to progress onto an apprenticeship there should be nothing preventing them from doing so. Also, if a Trainee was close to achieving their Maths or English GCSE it would be sensible for them to complete their Traineeship.

However the TUC would be concerned to see young people undertake consecutive Traineeship programmes. It would be hoped that upon completing a 6 month Traineeship a young person was ready to access the labour market.

The appropriate duration for the programme should be dependent on the needs of the Trainee and on the components that make up the traineeship and the length and number of work experience placements that a trainee will be expected to undertake. The TUC suggests that a Trainee should spend at least half the duration of a Traineeship on work experience placements.

The minimum length of a Traineeship should be 4 months. This will ensure the Trainee has sufficient time to develop relevant workplace skills and experience.

**Question 9: What other elements of flexible content would you expect to be added to the core locally?**

The needs of each potential Trainee should be assessed. Traineeships should be tailored to an individual's needs. Consideration should be given to adding the following modules/elements to a Traineeship, where needed:

- ESOL support needs to be provided free of charge to those who need English language support
- Where the young Trainee has had little prior experience of the workplace, consideration should be given to including a module highlighting the employment rights and responsibilities which arise in the workplace. This will not only improve the “employability skills” of the young Trainee but will help ease their transition into work experience placements and any future employment
- Given that it is likely that at least some of those undertaking the traineeship will have special educational needs, resources and consideration will need to be given to these Trainees to ensure they can participate in the Traineeship programme
- It may be necessary for Traineeship programmes to involve governmental and community organisations that specialise in engaging with young

people with a wider set of problems. For example some young people looking to undertake a Traineeship may have alcohol or drug related problems.

- Specific, relevant local labour market information

### **Question 10: What are your views on the most effective routes for delivering Traineeships?**

The education and training provider will be a key link to local employers and will be able to draw on their previous experience in delivering similar programmes. FE colleges and their staff have great expertise in engaging with young people, understanding the barriers they face when learning and in helping young people make the transition into work.

Whilst education and training providers should be the primary route for the design and delivery of Traineeships, the most important player in delivering the work experience placements will be the employer. Before any provider receives funding for Traineeships they must be able to guarantee the prospective Trainee with a work experience placement at a specified employer. It will be essential for providers to be effectively linked in with employers. By routing the funding primarily through education and training providers and placing the onus on them to guarantee work experience placements, the burden on employers will be minimised.

The TUC also supports the idea of the Employer Ownership of Skills pilots “EOP” being one of the Traineeship delivery methods. Building on the premise of the EOPs that employers should be responsible for developing their own skills strategy it makes sense for employers to be actively involved in designing Traineeships which will best enhance a young person’s chances of gaining a career in that workplace or sector. In unionised workplaces the employer should negotiate with the trade unions to ensure that funding from EOP is delivering Traineeships that are jointly agreed by both sides, as recommended in the EOP guidance documents.

The TUC also acknowledges that establishing Industrial Partnerships is a central theme for Round 2 of the EOP. Industrial partnerships would be uniquely placed to develop Traineeship programmes. The in depth sectoral knowledge of both employers, trade unions and their representatives would be invaluable in developing Traineeships to meet the needs of the sector.

The UKCES is responsible for approving EOP bids. This would enable a safeguard/quality control to be put in place, ensuring that Traineeships were a high quality route to progressing into employment.

There are other sectoral/partnership bodies which would also be well placed to deliver Traineeships. Further to the Heseltine Review LEPs may be able to play an active role also. Involvement from these employer led bodies will ensure that Traineeships are gaining skills which will give them a greater chance of being able to progress onto an Apprenticeship or into employment. These bodies should all

have strong employer and trade union voice, allowing a comprehensive sectoral skills strategy to be developed.

The TUC also welcomes the commitment in the discussion paper for Job Centre Plus to be involved in the delivery of Traineeships. JCP is in a unique place to promote and signpost the Traineeship programme but this must not result in the Traineeship programme being primarily perceived as an “unemployment programme” that claimants are mandated to participate in.

**Do the funding systems set out in Paragraph 27 provide sufficient flexibility to achieve this?**

Whether there is sufficient flexibility will depend on whether the budget can support the funding that will be needed to supervise both on the job and off the job training that Trainees will require.

The TUC is concerned about the amount of funding available for additional learning support which might be required by a Trainee on the programme. We have concerns that the budget allocated to the “Study Programmes” may not be sufficient to cover these learning needs. Under the new funding methodology the Education Funding Agency will only pay out for extra English and Maths and for those Trainees from deprived neighbourhoods using the “Index of Deprivation”. Given that it is likely that at least some of those undertaking the traineeship will have special educational needs “SEND”, resources may be stretched. The remainder of SEND funding is supposed to come from local authorities until the person is 25. The TUC is concerned that in the context of constrained financial resources, local authorities will not be able to meet these costs.

Information advice and guidance will be important throughout traineeships. It will be especially important in relation to those between 19 and 24 as there are other education and training options for this age group: the statutory entitlements to full 1<sup>st</sup> level 2s and 3s will continue for this age group; if the Richard Report’s recommendations on apprenticeships are accepted by the government, programme led apprenticeships may return. It will also be essential that Job Centre Plus advisors are aware of traineeships as an option for those on JSA and ESA.

Any Traineeships being delivered through the Employer Ownership Pilots will also be funded directly from UKCES and the £240m annual allocation – this should alleviate some of the pressure on the Study Programmes budget.

**Question 11: How can we ensure that Traineeships are a high quality route which delivers real progression for young people but minimises bureaucracy for employers and providers (Paragraph 30)?**

Our response to question 1 covers the essential elements that should be in place to guarantee a high quality Traineeship programme.

The government might also consider reviewing the current arrangements for tax relief for work-related training. A recent policy paper by unionlearn estimates that the total cost of this relief to the Exchequer is in the region of £5 billion per annum, with little available data on how it is being used by those employers that

qualify for it. This relief could be much more effectively targeted, for example, to give much greater priority to accredited training such as Traineeships and Apprenticeships.

**Question 12: The success of Traineeships will rely on employers offering high quality work placements. How can we best support and encourage employers to offer these? What will employers see as the benefits of being involved in Traineeships?**

The CIPD has carried out some innovative work, pulling together a publication<sup>9</sup> outlining the benefits to employers who recruit young people.

It may be useful to promote the document amongst employers who could potentially participate in the Traineeship programme.

Some key benefits to employers who engage with young people might include:

- Raising the organisation's profile through engagement with local communities
- Bringing new ideas and skills into the workplace. Young people often have very good ICT skills/social media skills which can be used in a variety of ways
- Young people may bring innovative and enthusiastic approaches to work
- Addressing skills shortages in the future, long term gains of attracting young workers to their organisations
- Benefits connected to workforce development and growing your own workforce, such as enhanced loyalty, reduced turnover, shared organisational culture, attracting talent and preparing for the future
- Greater workforce diversity, such as insights and connections to the market and customer base

Employers should be encouraged to submit bids through the Employer Ownership of Skills Pilots. Through participating in the design and content of Traineeships, they will maximise the effectiveness and relevance of Traineeships to their sector/workplace.

Larger employers will often have a commitment to corporate social responsibility. Helping local communities and providing young people with opportunities to enhance their employment prospects aligns neatly with this agenda.

Before any provider receives funding for Trainees they must be able to guarantee the prospective Trainee with a work experience placement at a specified employer. It will be essential for providers to be effectively linked in with employers. By

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<sup>9</sup>[http://www.cipd.co.uk/binaries/5937%20Business%20Case%20Emp%20young%20\(WEB\).pdf](http://www.cipd.co.uk/binaries/5937%20Business%20Case%20Emp%20young%20(WEB).pdf)



routing the funding primarily through education and training providers and placing the onus on them to guarantee work experience placements, the burden on employers will be minimised.