

## Education & Skills Funding Agency

### Consultation on Flexi-Job Apprenticeships: Crafts Council response

June 2021

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

We welcomed the Government's *Skills for Jobs: Lifelong Learning for Opportunity and Growth* white paper and support the ambition of this consultation exercise to make apprenticeships more portable. It is important that the vision fully reflects 'the varied and flexible models of employment' that we see in sectors such as the creative industries and the craft sector.

The Crafts Council is the national charity that inspires making, empowers learning and nurtures craft businesses. In 2019/20 we reached more than 1.9m people in the UK and beyond through our activities. We support craft makers and businesses to help them grow in the UK and overseas, through training, mentoring, advice and by showcasing makers through our directory. In 2019/20 we supported over 10,000 makers and craft businesses.

We would welcome the opportunity to make this vision for flexi-apprenticeships a reality. The craft sector:

- Contributes £3.4bn to UK economy
- There are over 11,000 craft businesses
- Craft employs 150,000 people
- Craft exports are the largest of the creative industries, totalling over £4.8bn (1.5% of total UK exports)
- Craft sales total over £3bn in 2019  
(Figures pre covid-19)

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

In recognising that breaks, delays and different approaches to training are typical of many sectors including the creative industries, the Government is opening up the possibility of addressing the challenges craft business face and we therefore embrace this opportunity.

It should be noted that the nature of training in the craft sector is that:

- many makers are self-taught, some are in second careers. The majority in makers who are established for more than five years in business are in portfolio careers ([The Market for Craft](#), Crafts Council, 2020).
- many makers are keen to pass on their skills and to grow their businesses and well-placed to offer high-quality training to develop skilled co-workers or employees.

However,

- Self-employed makers may have little direct employment experience to build on and often lack the experience to offer support to an apprentice. They also do not have the 'strong and

established relationships with a range of high-quality training and assessment organisations' that the Government see as characteristic of employers in its vision.

- training is hard to access as not tailored to the self-employed, microbusinesses and freelancers, which are all typical of the craft sector.
- many FE colleges do not currently offer the necessary college-based learning element or have the relationships with craft businesses to support apprenticeships, resulting in many privately-funded apprenticeships (some 1500 in 2014/15 – see [Studying Craft 16](#), Crafts Council, 2016)
- freelancers and micro businesses may face practical challenges in accommodating apprentices physically within small studios that may be subject to a range of health and safety requirements.

We support and welcome the ambition, but we are concerned that the Apprenticeship Training Agency model is only targeted at small and medium sized enterprises and is therefore not well suited to a sub-sector of mainly sole traders or a creative industries sector of a high number of freelancers. A key element of flexi-job apprenticeships in the craft sector would therefore need to include the opportunity for craft businesses to develop the necessary experience, support structures and relationships with training providers so that an apprenticeship could meet their needs.

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

The expectation must include the strengthening of college-based training opportunities and their relationships with local craft employers, as well as development and investment in craft ATA organisations capable of supporting apprenticeship schemes as outlined in the consultation document.

**Question 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?**

See answers to questions 2 & 3.

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

Yes.

**Question 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?**

See answer to question 2.

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

Yes, but it needs to support the development of new schemes to become eligible.

**Question 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 set out in section 2?**

See question 7. If access to funding is dependent on meeting the entry criteria, then the register needs to allow schemes in development to be admitted.

**Question 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?**

See previous answers.

**Question 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?**

See previous answers.

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

No.

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

No.

Whilst we support and welcome the ambition, we are concerned that the Apprenticeship Training Agency model is only targeted at small and medium sized enterprises and is therefore not well suited to a sub-sector of mainly sole traders or a creative industries sector of a high number of freelancers. There is no obvious provider for 'taking on responsibility for recruiting apprentices, administering the placement of apprentices with appropriate businesses, and providing ongoing monitoring and support to the apprentice and the host business.' Evidence from the Policy and Evidence Centre shows that:

- 76% of creative industries companies in the survey had worked with a freelancer in the past year;
- 41% of companies worked with as many or more freelancers than they had employees;
- 47% of supermicro (1-5 employees) companies worked with more freelancers than they had employees.

Some of the ATA examples given in the consultation are simply too large for the craft sector and other creative industries. Whilst the example of the ScreenSkills partnership suggests both smaller numbers and partnership approaches may be viable, this body is one of only two former sector

skills councils in the creative industries with the employment and training experience to take on this role.

It will take time and investment to generate support for and evidence of clear and sustained demand from potential craft employers and to develop the necessary financial, administrative, commercial, employment and support functions. The £7m fund should therefore also be available for development work towards becoming an ATA, rather than restricted to those bodies which have been accepted for registration.

Lastly, there is an opportunity cost for craft businesses in taking on an apprentice as this requires time away from making the product. It is, therefore, unlikely that many craft employers would be able to contribute to the costs of the ATA's operation in spite of recognition of the wider benefit it delivers to skills development.

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

We have no view on this.

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

See answers to questions 7, 8 and 12.

**Question 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?**

The £7m fund should also be available for development work towards becoming an ATA, rather than restricted to those bodies which have been accepted for registration.

See also our answers to questions 7, 8 and 12.

**Question 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?**

We believe that the scheme has the potential to benefit a sector with many on low incomes and to strengthen the diversity of the craft sector.