



Department
for Education

Levy paying employer decisions and accounting for prior learning

Research report 1005

October 2020

Learning and Work Institute



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Executive summary

Introduction

The government introduced the apprenticeship levy in 2017 as part of a wider series of reforms to improve apprenticeship quality and employer engagement. The apprenticeship levy is paid by employers with a pay bill of over £3 million per year. It is paid into a digital account which employers can access as funding to pay for apprenticeships.

Learning and Work Institute (L&W) was commissioned by the Department for Education (DfE) to conduct research to explore levy paying employers spending decisions, and to understand how employers and providers account for the prior learning of apprentices. The evidence will help to inform potential policy responses, to ensure high quality training for apprentices and value for money in the system.

The research aimed to gather evidence in relation to the following key areas:

1. The decisions levy paying employers make about how they spend their levy funds, including whether this is on existing employees or new recruits and why;
2. Whether and how employers and providers are assessing prior learning and adapting provision to account for this; and,
3. Whether apprentice prior learning could be better recognised, and how this could benefit different groups of apprentices.

The research involved qualitative interviews with 30 levy paying employers, 25 apprenticeship providers, and 25 apprentices. Interviews explored how employers were using their levy funding, how prior learning is assessed and accounted for by employers and providers, and how challenges associated with accounting for prior learning can be addressed. The use of 'respondents' in this research refers to viewpoints shared across employers, providers and apprentices. To inform background thinking and the development of topic guides for other respondent groups, 5 scoping interviews were conducted with stakeholders, including provider and employer representative bodies and a government department.

Levy paying employer decision making

This research categorised apprentices into three typologies: career starters¹; career changers²; and upskillers³. Employers were largely using their levy to upskill existing staff, rather than to recruit younger career starters or people seeking to change career. There was a general preference amongst employers towards apprenticeships at higher levels, which was largely driven by an employer's decision to use the apprenticeship levy to upskill existing staff, rather than recruit new staff.

Employers' prior experience of apprenticeships was an important determinant of how they chose to spend their levy. Those with a history of apprenticeship provision tended to have a more diverse apprenticeship offer, using the levy to upskill and recruit staff at a range of levels, than employers who developed their offer primarily to draw down levy funds. The latter group of employers focused largely on upskilling existing staff to ensure a more immediate return on investment.

Despite these differences, employers' decision making was predominantly influenced by financial considerations, with the apprenticeship levy regarded as the 'first port of call' to fund training. Recouping the full levy spend was an objective for most employers and considered to be best achieved through the delivery of high cost apprenticeships and/or mass enrolment of apprentices.

In several instances, the levy was being used to fund apprenticeships that directly replaced previously offered training, such as leadership and management courses. Most employers perceived the levy to have had a positive impact on their training offer, widening opportunities for staff training, and improving quality. The ability to invest in leadership and management was particularly welcomed by employers as a means of addressing skills gaps within their businesses.

Spending decisions were also shaped by the extent to which levy payers considered the apprenticeship offer suited the needs of their business. Some employers, particularly those in niche industries, reported a lack of suitable apprenticeship standards. More broadly, employers referenced requirements set out in the apprenticeship funding rules – such as the 12-month minimum duration, the requirement for at least 20% off-the-job

¹ Typically defined by interviewees as new recruits, usually under 19 years old.

² Typically defined by interviewees as individuals who are seeking to change career, often over 19 years old, with some degree of prior learning which may be transferable to a new role.

³ Typically defined by interviewees as individuals who are accessing an apprenticeship with their existing employer to improve their skills in their role. Also, typically, over 19 years old, with a variable range of prior learning.

training, and English and maths skills requirements⁴ - as affecting the suitability of the programme in meeting their needs. For instance, when existing staff had low English and maths skills, or roles were not able to accommodate time for off-the-job training, employers felt unable to use their levy to invest in staff development or support the recruitment of new staff.

Most employers reported that their knowledge and understanding of apprenticeships was increasing and their strategy for utilising the levy was therefore subject to change. Upskilling existing staff was often regarded as an 'easier' way to spend the levy than recruiting and supporting new staff. This was particularly the case among employers with a large levy pot⁵, or those with substantial pressure from company boards to use up their levy. Most employers expected to expand their use of higher-level apprenticeships as standards⁶ became available and several employers across a range of sectors had immediate plans to offer level 7 Senior Leader apprenticeships for their executive leaders. While some employers planned to use their levy to support new recruits, those plans were often small scale, and dependent on organisational capacity to recruit, support and pay new staff.

Assessment of prior learning

Most apprentices had reportedly undergone some form of assessment of their prior learning, although a small number of both apprentices and employers did not recall any prior learning assessments having taken place. In contrast, all of the providers interviewed reported that they assessed the prior learning of their apprentices – though substantial variation was found in the breadth, quality and robustness of these approaches.

Some providers, and most apprentices, described light-touch processes, focused on an English and maths assessment, and a review of existing qualifications, mapped to standards. These approaches had a minimal emphasis on vocational behaviours and competencies. The most comprehensive approaches involved an in-depth assessment of behaviours and skills (in addition to qualifications), administered prior to selection by a

⁴ The funding rules state that an apprenticeship must provide for training that lasts for a minimum duration of 12 months, at least 20% of the apprentice's paid hours, must be spent on off-the-job training and apprentices are required to evidence certain levels of functional skills qualifications: Education and Skills Funding Agency (2019) [Apprenticeship funding rules](#).

⁵ In these findings, 'small' levy payers are categorised as employers which contribute less than 100,000 annually, 'medium' levy payers as those contributing between £100,000 to £500,000 annually and 'large' levy payers as those contributing more than £500,000 annually.

⁶ Apprenticeship frameworks are qualification focused and involve ongoing units-based assessment. In contrast, standards are occupation-focused, with an end point assessment. Apprenticeship standards are developed by employers and contain the knowledge, skills and behaviours an apprentice will need to have learned by the end of their apprenticeship. Apprenticeship standards will replace frameworks by 2020.

specialist and skilled assessor. Key features of such good practice⁷ included the use of comprehensive assessment tools, delivery of high-quality assessor training and strong partnership working between employers and providers. An example of partnership working included tripartite meetings between the apprentice, their line manager and their provider. These meetings provided the assessor with a more robust and balanced view of the apprentices prior learning than more light touch approaches, which could be confirmed or challenged by their employer and reviewed in line with the content of the standard.

Providers reported a range of challenges that prevented them from delivering this more comprehensive model of assessment as standard practice:

- Prior learning assessments were better at recognising apprentice knowledge, but it was much harder to gain an accurate picture of skills and behaviours;
- Variations in an apprentice's self-awareness, confidence and maturity, made it difficult to ascertain their genuine starting point;
- It was difficult to capture and evidence which qualifications an apprentice has already completed where certificates are lost or personal learning records out of date;
- It was sometimes challenging to map prior qualifications against standards;
- An assessment of prior learning required considerable time and financial investment, which could limit the depth of provider approaches and the extent of employer involvement; and,
- Employers lacked knowledge and awareness of standards and how prior learning can be mapped against standards, which could also limit the extent of their involvement in assessing prior learning.

The type of apprentice (career starter, career changer or upskiller) impacted on the value and effectiveness of prior learning assessments. Both providers and employers considered that assessment was relatively straightforward for career starters, who generally had less prior learning to assess. In contrast, career changers and upskillers were more challenging to assess, as they had more prior learning to account for. For career changers in particular, the assessment also needed to account for transferable skills, requiring judgements to be made about the level of transferability between sectors and occupations.

⁷ Good practice refers to approaches which reflect the approaches set out in government guidelines and/or which respondents felt delivered the most representative picture of an individual's prior learning.

Adapting apprenticeships to prior learning

Although most providers confirmed that they made adaptations to account for prior learning, the majority of apprentices and employers interviewed were not aware of any adaptations made to their apprenticeship.

In the few instances where both employers and apprentices recognised adaptations to their programme of learning, this generally involved the removal of modules or units. For others, apprentices were able to select appropriate modules, including those at a higher level than they were otherwise studying for.

A lack of adaptation did not generally appear to affect apprentices' satisfaction with their programme. Rather, many identified that repeated material was a useful refresher if learned or applied in a new context. At worst, re-learning content was considered to be 'tedious', having only a minor negative impact on satisfaction levels. The exception to this was when a large proportion of material was already being routinely applied in a more advanced manner in the apprentice's day-to-day work, in which case the apprenticeship programme of learning was likely to be viewed as unengaging and low quality. Within some providers, the assessment of prior learning and identification of adaptations was undertaken by curriculum teams, while the business development or sales team negotiated with employers on price. This split of responsibilities meant that it was rare for adaptations to be reflected in the cost of the apprenticeship. Some providers did not negotiate on price at all and instead considered final decisions on content and price as a proposal to be accepted by employers.

Both providers and employers identified difficulties in adapting programmes, whilst still meeting requirements for at least 20 per cent off-the-job training and the 12 months minimum duration of an apprenticeship. Wider issues such as the challenge of delivering individually tailored classroom-based learning and ensuring financially viable cohorts were also referenced. The most frequently cited challenge was the financial disincentive of reducing programme content, both for providers and for employers who wanted to spend as much of their levy as possible. Several employers were actively resistant to individual adaptations being made, as they were keen for all of their apprentices to receive consistent training and to learn material 'in the company way'.

Respondents gave a range of suggestions as to how prior learning could be better recognised within the apprenticeship programme. These suggestions largely related to a need for more guidance and further information about how prior learning should be assessed and programmes adapted, to ensure that these processes were applied consistently by providers and employers.

Respondents reported that improved consistency of the prior learning assessment and adaptation of apprenticeships would most benefit upskillers with relevant prior learning.

Individuals in this group could be incorrectly ruled as ineligible for an apprenticeship or access the wrong level of apprenticeship if their prior learning was not correctly accounted for. It was argued that amending the duration of the programme could enable some upskillers to access shorter apprenticeship programmes⁸, and this would reduce the time (programme length) required within which to undertake 20% off-the-job training. This is important because time spent off-the-job was mentioned by some employers and apprentices as difficult to manage, particularly within the context of an existing workload.

In contrast, respondents felt that improved prior learning assessment and adaption processes would have less of an impact for career starters with limited prior learning, as they did not often require adaptations to apprenticeship provision. Similarly, some respondents asserted that career changers may not benefit from more robust prior learning assessment as there was limited scope for apprenticeships to be adapted to reflect transferable skills due to the requirements for relevant technical knowledge, skills and behaviours in apprenticeship standards. However, clearly this is dependent on the nature of the career change, namely the degree of difference between the knowledge, skills and behaviours required in their apprenticeship and prior employment.

Areas for further consideration

Together the evidence gathered for this research and publicly available quantitative data on apprenticeship starts⁹ indicate distinct trends in the ways in which employers are using their levy. In formulating an appropriate policy response, the DfE might best first consider the extent to which these trends align with government's aims for the apprenticeship programme and intentions behind the apprenticeship levy. Clarity on what and who apprenticeships are for will enable assessment of what action should or should not be taken.

The assessment of prior learning, and subsequent adaption of content, duration and time is critical to ensure the quality of apprenticeships and value for money in the system. In light of the challenges highlighted in this research to ensuring prior learning is implemented consistently and robustly, the DfE could consider how it can incentivise providers and employers to ensure that assessment of prior learning is carried out properly, for example by making funding available for this. Alternatively, the department could consider how to improve compliance with funding rules, for example through a

⁸ Noting that apprenticeships must still meet the minimum 12 month duration as set out in the apprenticeship funding rules.

⁹ [Monthly apprenticeship starts by sector subject area, framework or standard, age, level, funding type and degree apprenticeship](#): April 2019

more visible audit of proof of assessment and adjustments from the Education and Skills Funding Agency¹⁰.

Feedback from employers and providers suggested that some requirements of an apprenticeship make it an inappropriate or unattractive programme for some individuals or sectors. In developing future policy, the DfE could consider ways in which providers and employers can be incentivised to offer alternative learning and development, where an apprenticeship is not the most suitable option, including how this could be financed.

Most of the suggestions from providers and employers for the improvement of assessment of prior learning itself mainly related to the provision of clear and accessible guidance. As such, the DfE and the Institute for Apprenticeships and Technical Education could consider making the following available:

- Robust guidelines or standardised templates to help training providers assess prior learning, including materials to assess behaviours;
- Information on how to link prior learning to the duration of the programme;
- Guidance on reducing the cost of programmes based on adaptations for prior learning and on how to negotiate this with employers; and,
- Training for practitioners conducting assessments.

¹⁰ See [apprenticeship funding rules](#) and ESFA [guidance on initial assessment to recognise prior learning](#)

1. Introduction

Learning and Work Institute (L&W) was commissioned by the Department for Education (DfE) to undertake research to explore apprenticeship levy paying employer decision making, and the drivers of this. The research involved qualitative interviews with levy paying employers, apprenticeship providers and apprentices. Scoping interviews were also conducted with wider stakeholders, including provider and employer representative bodies and a government department. Interviews explored how employers were using their levy funding, how prior learning was assessed and accounted for by employers and providers, and how challenges associated with accounting for prior learning could be addressed. This report presents the findings from this study and identifies areas for consideration in the future development of apprenticeship policy.

1.1 Context

The government has a clear agenda to grow the number and quality of apprenticeships.¹¹ As part of a commitment to raising quality and employer engagement, the government has introduced a set of reforms to the system. These include the introduction of the apprenticeship levy¹², which came into force in 2017, and the transition from apprenticeship frameworks to standards¹³.

Apprenticeships can be an effective way of training new recruits, and of retraining or upskilling existing workers. However, apprenticeships must lead to genuine skills gain, rather than the accreditation of existing skills. Levy funds may not be used for training which merely accredits existing skills, knowledge or behaviours, but rather be used to fund learning that develops new knowledge, skills and behaviours.¹⁴

As such, apprenticeship training providers are required to assess prior learning before an apprenticeship starts. If the individual has relevant prior learning, the content, duration and price of the apprenticeship must be reduced accordingly. If this brings the apprenticeship below the minimum 12-month duration the individual is not eligible for the apprenticeship.

¹¹ HM Government (2015) [English Apprenticeships: Our 2020 Vision](#).

¹² The apprenticeship levy is paid by employers with a pay bill of over £3 million per year. Levy paying employers have a digital account, from which they can draw down funding to pay for apprenticeship training and assessment.

¹³ Apprenticeship frameworks are qualification focused and involve ongoing units-based assessment. In contrast, standards are occupation-focused, with an end point assessment. Apprenticeship standards are developed by employers and contain the skills, knowledge and behaviours an apprentice will need to have learned by the end of their apprenticeship. Apprenticeship standards will replace frameworks by 2020.

¹⁴ Education and Skills Funding Agency (2019) [Apprenticeship funding rules](#).

The effective recognition of prior learning is important for both the individual apprentice and the system as a whole. For example, recognising and adapting for prior learning ensures that apprenticeship training content is tailored to individual needs, enabling them to develop new knowledge, skills and behaviours and not repeat existing learning. For the wider system, effective recognition of prior learning ensures that the apprenticeship programme delivers value for money by not duplicating learning.

The funding band for each standard sets out the maximum public funding that can be used towards an apprenticeship, with the expectation that employers will negotiate prices with providers. However, research¹⁵ and data released by the DfE in a Freedom of Information request has found that employers are largely paying the maximum rates. This has prompted concerns from a range of interested parties, including Ofsted, that training providers may not be properly assessing prior learning and that some apprenticeships – particularly those for existing employees – may merely accredit existing skills.¹⁶ This has led the Education and Skills Funding Agency (ESFA) to issue guidance, reminding training providers, employers and apprentices of the need for a robust initial assessment and recognition of prior learning.¹⁷ This guidance specifies that prior to an apprenticeship start, the training provider must assess the individual's prior learning to establish a baseline which informs the content, duration and cost of the apprenticeship programme. The provider should then agree with the employer how the cost, content and duration of the programme will be adapted to reflect any prior learning.

Concerns among interested parties, including the National Audit Office, also exist around whether the levy has led more employers to use apprenticeships as a mechanism to replace existing training programmes rather than to expand training options.¹⁸ This study sought to develop the evidence base on both of these issues.

Apprenticeship starts since the levy

The volume and profile of apprenticeships has changed considerably over the past few years, with the number of starts decreasing from over 509,000 in 2015/16, to just under 376,000 in 2017/18¹⁹. Further analysis reveals distinct patterns between apprenticeships undertaken with levy paying and non-levy paying employers. Levy paying employers

¹⁵ National Audit Office (2019) [The apprenticeships programme](#).

¹⁶ IFF Research (2017) [Apprenticeships evaluation 2017: employers](#). Department for Education

¹⁷ Education and Skills Funding Agency (2019) [Apprenticeships: initial assessment to recognise prior learning](#).

¹⁸ National Audit Office (2019) [The apprenticeships programme](#)

¹⁹ All data in this section can be found here: [Monthly apprenticeship starts by sector subject area, framework or standard, age, level, funding type and degree apprenticeship](#): April 2019.

were more likely than non-levy payers to take on apprentices at level 4²⁰ and above. In 2017/18, 18% of apprenticeship starts with levy paying employers were at level 4 or above, in comparison with just 8% of apprenticeship starts with non-levy paying organisations.

Between 2014/15 and 2017/18, the proportion of apprenticeship starts at level 2 fell from 60% to 43% with a particularly sharp fall among levy paying employers. Level 2 apprenticeship starts with levy paying employers decreased from 54% in 2016/17 to 38% in 2017/18, while starts at level 3 and above increased. Level 2 apprenticeship starts with non-levy payers fell to a lesser extent, from 53% in 2016/17 to 47% in 2017/18.

Levy paying employers were also more likely than non-levy payers to employ older apprentices. In 2017/18, 50% of apprenticeship starts in levy paying employers were over 25, with just 19% aged under 19. In contrast, 33% of those with non-levy paying employers were aged 25 and over and 38% aged under 19.

1.2 Research aims

The aim of this study was to build the evidence base around the decision making of levy paying employers, and the drivers underpinning this, and around prior learning. The research aimed to gather evidence in relation to the following key areas:

1. The decisions levy paying employers make about how they spend their levy funds, including whether this is on existing employees or new recruits;
2. Whether and how employers and providers are accounting for prior learning and adapting provision to account for this; and,
3. Whether apprentice prior learning could be better recognised, and how this could benefit different groups of apprentices.

1.3 Methodology

The study adopted a qualitative approach to facilitate a detailed exploration of the key research questions from the perspective of employers, training providers, apprentices and wider stakeholders. A total of 30 levy paying employers²¹, 25 apprenticeship training

²⁰ For comparison, level 2 is equivalent to GCSE grades 9-4 or A*-C. Level 3 is equivalent to A-Level. The full list of level equivalents can be found on the [Government website](#).

²¹ Employer representatives were senior individuals within organisations with decision making responsibility for apprenticeships. These were usually Heads of Human Resources or Learning and Development.

providers²² and 25 apprentices were engaged in the research. The use of ‘respondents’ in this research refers to viewpoints shared across employers, providers and apprentices. Where differences exist within and/or between individual respondent groups these groups are named. Interviews were also conducted with 5 stakeholder organisations, including sector bodies, provider representative bodies and a government department. These stakeholder interviews provided background information to inform thinking and the development of topic guides for interviews with employers, providers and apprentices; these responses are not reported.

This research was qualitative in nature, with a purposive sample designed to obtain a wide range of perspectives. It is important to note that the findings are not intended to be, and cannot be taken as, representative of wider populations of employers, providers or apprentices. The use of ‘all’, ‘most’ and ‘some’ in this report illustrate the prevalence of views amongst research participants and are not generalisable to the wider population. Nevertheless, the findings do provide insight into the breadth of issues and views that exist within the wider population of employers, providers, and apprentices.

Apprentice, employer and provider participants were recruited on a purposive quota basis, using Individualised Learner Record (ILR)²³ data as a sampling tool. ILR data was taken from the 2017/18 academic year onwards to provide a focus on post-levy activity, and to increase the likelihood of participants being able to accurately recall recent decision making and practice. Participants were sampled for coverage across different sectors (using the 15 technical education routes), provider type (general further education (FE) colleges, sector-specific FE colleges, independent training providers (ITP) and employer-providers), apprentice demographics (age, gender, ethnicity, new recruits/existing employees, routes and levels), and geographical region. The sample frame for participants is listed in Appendix 1. All participants were recruited using a combination of email and telephone approaches.

The in-depth interviews were conducted using topic guides developed by L&W to reflect the four interview types: employer; provider; apprentice; and, stakeholder. The topic guides were designed to be used flexibly by the research team following a detailed briefing. Interviews typically lasted between 40 and 60 minutes and were audio recorded and subsequently fully transcribed.

²² Provider representatives were individuals within organisations with responsibility for conducting the prior learning assessment of apprentices.

²³ The Individualised Learner Record (ILR) is learner data that publicly funded colleges, training organisations, local authorities and employers (FE providers) must collect and return to the Education and Skills Funding Agency (ESFA).

Interviews were analysed using a thematic framework approach. To incorporate a behavioural element into the research, COM-B principles²⁴ were used to examine the capability (physical and psychological capabilities), motivations (existing priorities, prior experiences and impulses) and opportunities (both physical dictates and social norms) that affected decision-making and behaviour of employers and providers.

Where possible, with consent from participants, interviews were matched to build a rounded picture of practice, including perspectives from apprentices, their employer and/or their provider. The research achieved a total of six matches between an apprentice, employer and/or provider. These are included as 'case study' vignettes to illustrate points of interest within the report. Pseudonyms have been used for all individuals and organisations to maintain anonymity.

1.4 Structure of the report

This report includes analysis of:

- Levy paying employer decision making, including how employers were spending their levy, the impact on internal training offers, and drivers of this behaviour.
- Assessment of prior learning, including approaches to assessment, respondents' views on the effectiveness of these approaches, and challenges in assessing prior learning.
- Adaptions made to apprenticeships to account for prior learning, including the extent to which respondents recognised adaption, the process for negotiating and making changes, and challenges in adapting apprenticeships.

The report considers whether apprentice prior learning could be better recognised and how this could benefit different groups of apprentices. It concludes with a summary of findings and consideration of the implications for policy and practice.

²⁴ COM-B is a recognised approach to understanding behaviours which explores capabilities, opportunities and motivations. The development of this model is explored here: Michie, S., Van Stralen, M., and West, R. (2011). [The Behaviour Change Wheel: a new method for characterising and designing behaviour change interventions](#). Implementation Science.

2. Levy paying employer decision making

This chapter primarily draws upon interviews with levy paying employers and providers to review how employers are spending their levy, and the key factors driving their behaviour. It explores the factors that influenced the types and levels of apprenticeship offered, the type of apprentice employed and employers' plans for the development of their apprenticeship provision.

2.1 Employer levy spend

Levy paying employers involved in this research reported vastly different levels of levy contribution at the time of interview, ranging from £18,000 to around £15m annually. Consequently, there was a large variation in the number of apprentices employed, from just one apprentice to approximately 6,000. For some employers, apprentices made up less than 1% of the workforce; within others, up to 12% of staff were on an apprenticeship. These differences were explained in part by the size of an employer's levy contribution and the amounts that become available in their apprenticeship levy accounts. Those with a smaller levy pot²⁵ considered themselves to have less opportunity to make wholesale changes to their recruitment and training practices and recruit more apprentices, compared to employers with a larger levy pot. However, variation in the size of an employers' levy contribution did not fully explain patterns within the data.

Some employers had apprentices across the breadth of their business, while others restricted apprenticeships to certain areas such as human resources (HR), or project manager roles. Just under half of those interviewed only employed apprentices in roles outside of their core business, for example support staff or business administration. Factors such as the availability of standards (especially when the employer operates in a niche or highly specialised sector), the size of their levy pot and perceptions about how apprenticeships could be used, were cited as underpinning this. Employers involved in this research offered apprenticeship standards, although some also used frameworks. Where frameworks were in use, this was often attributed to standards not yet being available²⁶. Examples cited included the level 2 telecoms field operative, level 4 engineering manufacturing technician, and the level 5 leader in adult care. While employers were keen to adopt standards as soon as they became available, concern

²⁵ In these findings, 'small' levy payers are categorised as employers which contribute less than £100,000 annually, 'medium' levy payers as those contributing between £100,000 to £500,000 annually and 'large' levy payers as those contributing more than £500,000 annually.

²⁶ At the time of writing, the [Institute for Apprenticeships and Technical Education website](#) lists 120 standards currently in development.

was expressed by those with a smaller levy pot, that some standards – such as the level 5 leader in adult care – would be priced at a far higher cost than a standalone qualification.

Most of the employers interviewed offered apprenticeships only to existing staff. A small proportion offered apprenticeships to predominantly new staff, but none offered apprenticeships exclusively to new staff. Employers who offered apprenticeships to mostly new staff tended to be in sectors such as engineering, manufacturing and telecommunications, where employers have a long tradition of offering apprenticeships. These employers were a mixture of smaller and larger levy contributors; smaller levy contributors either employed new staff in administrative or support roles, or in core roles where they had historically offered apprenticeships. Larger levy payers had more capacity to recruit apprentices and offered a range of standards.

Employers reported offering apprenticeships at a range of levels, depending on whether the apprentice was a new or existing staff member, the types of standard and role, and the individual's prior experience. There was a further differentiation between those who managed their apprentices in cohorts and those who took a more individualised or ad hoc approach, resulting in a wider spread of levels.

New staff who were recruited into apprenticeships were more likely than existing staff to start on programmes at levels 2 or 3. There were fewer examples of new starters being offered apprenticeships at a higher level. In specialised technical industries, some employers highlighted that they required management staff to have experience within the industry, so preferred to utilise the levy to upskill and progress existing staff.

Invariably you would find a team leader being promoted from a previous role rather than being recruited in externally because it's quite a technical business. They need a certain knowledge base to be able to manage a team within a factory like that. – *Employer*

Some employers, in areas such as customer service, health and social care and warehousing, used their levy to upskill existing staff at levels 2 and 3. In general however, investment in existing staff took place at higher levels. Most employers interviewed had a targeted apprenticeship offer for existing staff in leadership and management either at level 3 or at level 5 and above. There were also several examples of senior staff accessing level 7 Senior Leader²⁷ apprenticeships.

²⁷ This apprenticeship was often referred to by respondents as a Master of Business Administration (MBA).

Changes to apprenticeship offers since the introduction of the levy

Both employers and providers recognised changes in both the nature of apprenticeship opportunities and profile of apprentices since the introduction of the levy.

Employers with a previously established apprenticeship programme have used the levy to take on increased numbers of apprentices. Other employers have used the levy to introduce an apprenticeship programme, which they may not have considered before. The main reasons given for not previously considering apprenticeships were associated with lack of motivation or requirement to do so, and a perception that apprenticeships were for young people and would not address the skills requirements of their staff. These perceptions were particularly evident in sectors with a more highly qualified workforce and had changed since the introduction of apprenticeship standards which have increased the types and levels of apprenticeships available.

Since the introduction of the levy, changes have also been seen in the level of programmes on offer. An increase in apprenticeship starts at level 4 and above has been driven by the availability of standards at these levels and by the increasing focus by employers on using apprenticeships to upskill their existing workforce, who tend to be qualified at level 3 or above.

Several employers, who were new to apprenticeships, said the levy provided a training budget that they did not previously have. Furthermore, the levy was widely seen by employers as their own fund to recover - the key reason some employers cited for switching their existing training offer into apprenticeships, where appropriate.

It has allowed us to offer a lot more that we wouldn't normally have offered in the past. Certainly [...] the higher level apprenticeships. Some of the lower level stuff, we were offering previously through other funding streams. But the levy [...] gives us extra money in our budget to be able to offer these things. – *Employer*

Case study 1 below (see page 18), exemplifies an employer strategically using their large levy pot. It details how this employer used their levy to support a range of apprentices by recruiting new employees and upskilling existing staff. The size of the employer's levy pot enabled this employer to offer apprenticeships across a range of levels and standards to suit the needs of individuals.

Case study 1 – Employer with large levy-funded programme and university provider²⁸

Food Inc is a large UK-wide food manufacturing organisation with 17,000 employees, including 350 apprentices. Food Inc offers apprenticeships on 35 different standards, from level 2 to level 7. They contribute £2 million to the apprenticeship levy annually.

Food Inc recruits apprentices every year, including new starters and existing employees. The offer includes a range of levels: junior staff may do a level 2 or level 3 apprenticeship, site leaders may do a level 7.

It's available to anyone as long as the site can support them, and they can justify why they're doing it. There has to be an actual development point. It's not just about trying to sign up as many as possible to spend the money, there's no point in that. – *Food Inc*

Since the introduction of the apprenticeship levy, Food Inc's training programme has undergone substantial change. Previously, most of their training was based on short, fee-paying courses. Now, apprenticeships are the 'first port of call' for development needs, and this has enabled a broader range of staff to access training.

Food Inc works with a range of providers, including a university that offers apprenticeships from level 2 to degree level in a range of subjects. Before enrolment, Food Inc reviews the standard and the potential candidate's prior learning. They then select candidates who would learn a substantial amount of new material on the course.

...it's not just about not wasting the money, it's about [not] wasting that person's time. We've all had to sit through training courses that we didn't really need to be on just to tick a box. It's quite disheartening so we tend to avoid that, for our internal process, before we even get to the skills scan with the provider. – *Food Inc*

During enrolment, the provider asks the candidate to complete a skills scan. If any prior learning is indicated, the candidate will have an in-depth discussion with the programme lead. If prior learning is confirmed then apprentices will skip the relevant module, with the corresponding cost deducted from the overall programme cost.

The key success factors of the apprenticeship were:

- Embedding apprenticeships within the employers broader training programme.
- Employer assessment prior to enrolment to ensure candidates will undertake substantial new learning.

2.2 Impact of apprenticeship levy on internal training offers

Training decision making

Employers described their decision making about training as largely motivated by financial drivers and business needs. As such, most employers saw the apprenticeship levy as their 'first port of call' for training existing staff.

If we didn't use that money, we'd lose it. And that's such a shame when you think that could be used so well to upskill staff. – *Employer*

Most employers took one of two approaches when deciding to offer apprenticeships to existing staff. The first approach was strategic, whereby employers considered workforce development and business needs, conducted skills analyses and embedded apprenticeships within annual performance review processes. The second approach was more ad hoc, where employees put themselves forward for consideration, often following some internal communication of opportunities.

Where apprenticeships were more strategically embedded within an organisation, this was likely to have a greater impact on the internal training offer than an individualised ad-hoc approach. This was particularly evident where companies conducted an organisational review of skills gaps or targeted specific roles such as first and second level managers, project managers and team leaders for enrolment onto apprenticeships. Employers with a relatively small number of apprenticeships or a small levy pot, were less likely to say that the programme impacted their wider training offer.

We're not a huge levy purse. It's not as though we're [...] paying millions of pounds and it's having a big impact on the training budget. So yes, at the margins, but nothing significant. – *Employer*

Impact of budgets

Most employers and providers identified wider budget considerations as a key factor in determining which training was funded through the levy. Employers with more restricted non-apprenticeship training budgets were likely to aim to be 'levy neutral' by enrolling large cohorts of their staff onto apprenticeships. This was driven by pressures from company boards, reduced training budgets or lack of funding for shorter duration training.

²⁸ This case study was developed from interviews with a levy paying employer and one of the training providers they work with.

Some employers with less pressing budget restrictions reported 'writing off' the levy, including one employer who planned to transfer some of their levy pot to local organisations. These employers were able to weigh up the loss of levy funds against the costs they would incur by using it, such as the requirement for apprentices to undertake 20% off-the-job training, or the resources required to recruit, support and pay career starters.

Suitability considerations

The final factor influencing employer decision making about the use of the levy to fund training for existing staff, was their perception of the suitability of apprenticeships for their staff and/or their business. The most common suitability considerations included²⁹:

- A staff member's existing workload and whether 20% off-the-job training could be accommodated.
- Whether an internal programme could more quickly or efficiently teach specific technical skills or was better suited to an individual's learning style.
- The capacity of managers to support apprentices at the level required.
- The individual's level of confidence to achieve and/or demonstrate the necessary functional skills to pass an English and maths assessment.
- The ability of staff to commit to the apprenticeship programme for the duration.
- Whether the role offered sufficient growth in opportunity and responsibility to constitute an apprenticeship.
- The extent to which the staff member would benefit from the wider programme of learning offered by an apprenticeship.

These suitability considerations varied both by employer type and business needs, and the age, career stage, and level of seniority of potential apprentices. For instance, employers with high proportions of highly qualified staff identified challenges in finding the right level of apprenticeship, given the extent of their prior learning. Other employers where staff have historically not been required to have English and maths qualifications, such as care services or agriculture, were more constrained by an individual's ability to complete functional skills or commit to a longer-term programme of study. When several of these factors combined, the apprenticeship programme is seen as unsuitable for training existing staff.

The apprenticeship levy is contradictory to the healthcare sector where we're trying to recruit people on a values basis [...] people

²⁹ The list of considerations is sorted by prevalence in the research.

[are] often carers themselves, either for disabled children or for older parents or siblings [...] so they don't have the time to study the same way as maybe some other sectors [...] and the fact that you have to do the maths and English and the end point assessment³⁰ has definitely had a detrimental effect on the uptake. – *Employer*

Key changes to training

These suitability considerations varied both by employer type and business needs, and the age, career stage, and level of seniority of potential apprentices. For instance, employers with high proportions of highly qualified staff identified challenges in finding the right level of apprenticeship, given the extent of their prior learning.

At the junior level, we still did apprenticeships, back in the day, before the levy came in [...] we used to deliver frameworks and have those delivered. In terms of the more senior people, we probably only delivered that sort of training since the levy came in. – *Employer*

Several employers believed that the apprenticeship levy facilitated greater access to more and higher quality training. Previously, staff may have only had access to free online modules or shorter courses which tended towards defined technical and less transferable skills. Through apprenticeships, staff are now able to develop a wider skillset, providing enhanced opportunities for progression. Some apprentices with higher level qualifications also valued the opportunity to access training not previously on offer. Several employers and providers said that apprentices felt satisfied, invested in and were more likely to envisage a longer-term career pathway within the business. This was confirmed by most apprentices:

Overall, it's one of the best things I've ever done at work [...] I'm so glad I'm doing it. It's without doubt changed my future and my present life at work. I'm so much more committed – *Apprentice*

Providers, and a small number of employers, reported that the levy had resulted in some negative implications for existing training. The most frequently cited negative impact was the reduction of non-apprenticeship training budgets, which some employers and providers noted being a strategy to compensate for having to pay the levy. This reportedly resulted in staff having to make stronger cases for non-apprenticeship training,

³⁰ End point assessments have been introduced as part of the apprenticeship standards which require all apprentices to take an independent assessment at the end of their apprenticeship to confirm that they can demonstrate the knowledge, skills and behaviours set out in the apprenticeship standard.

which could disadvantage individual staff who are not able or willing to do an apprenticeship. This pressure on training budgets was most damaging for the small number of employers who reported that the apprenticeship offer was incompatible with staff or business needs.

The business views this huge amount of money going into the levy pot, they can get very frustrated that we can't use it a lot of the time. I think there can be a reluctance to then spend more money on training when we've already paid it into the levy, regardless of whether we're able to use it or not. – *Employer*

Extent to which the levy has replaced internal training

Some employers and providers described the levy as being used to fund training that would have been funded by the employer anyway. This was common for leadership and management courses, as well as a range of qualifications such as health sector National Vocational Qualifications (NVQs) and diplomas, Higher National Certificates (HNC), Chartered Institute of Personnel and Development qualifications (CIPD), chartered town planning and several foundation degrees. These were being replaced by apprenticeship standards which included the qualifications within these or provided similar learning.

Employers were most likely to justify the replacement of training programmes as an appropriate and effective way to spend the levy. Training providers tended to be less positive about the replacement of employer-funded training with levy-funded apprenticeships, and cited concerns about value for money as apprenticeships replaced training budgets rather than prompting additional investment in recruitment or new training opportunities. Some providers also noted the impact on provider finances as the market for non-apprenticeship training has declined and associated spend reduced.

I know it's had a negative impact because employers are now utilising the levy to upskill and train learners rather than pay for it out of separate budgets. – *Provider*

However, levy-funded apprenticeships were not completely replacing other provision. The main reasons for this were the suitability considerations noted previously. A further factor in sectors such as engineering, manufacturing and construction was the continued need for legislated training which was not currently included within standards.

At the beginning, we hoped the training spend would reduce. But, because of the nature of the industry, a lot of the training that they do within their training budgets is mandatory training. – *Employer*

2.3 Apprentice typologies

Given the range of ways levy paying employers reported spending their levy and the changing profile of apprentices, this research sought to test whether apprentices could be broadly categorised into three typologies: career starters, career changers, and upskillers. This was not intended to be exhaustive or definitive but aimed to develop an understanding of who levy paying employers targeted for apprenticeships, and why.

Career starters

Career starters were the most recognised typology among employers and providers, and there was a stronger degree of agreement amongst employers and providers concerning their characteristics, than the characteristics of upskillers and career changers. The key features defining this apprentice type included:

- New recruits, rather than existing employees.
- Usually under 19 years old, accessing an apprenticeship following completion of initial education.
- Predominantly accessing apprenticeships at level 2 or level 3.
- Generally little to no prior learning or experience in an occupation.
- Lacking workplace experience and employability skills, thereby requiring more time and support to learn required knowledge, skills and behaviours.
- May need support to work independently, apply their knowledge and skills practically and reflect on their practice.
- Likely to gain from learning transferable skills through apprenticeships, such as public speaking, customer service and time management.

All employers and providers recognised career starters in both 'non-core' and 'core' business occupations, for example in a range of technical apprenticeship roles and support staff roles such as HR. Most employers who recruited career starters based their decision to hire on the apprentice's potential to 'fit the business' in terms of their interests, attitudes, soft skills and relevant qualifications. A key reason for employing career starters as apprentices was to train them up in niche or specialist areas such as in software development or as aviation operatives, where it could be otherwise difficult to recruit employees with the necessary skills, and then subsequently support them to develop their skills to meet business needs. Career starters were also employed as part of an employer's drive to increase workforce diversity or hire local residents.

While few employers had yet to use their levy to recruit higher level career starters, several employers and providers regarded this as an emerging trend. For example, degree apprenticeships were particularly regarded as both an appealing alternative to

university for young people and attractive to employers with this level of skills need in their organisation.

Upskillers

All employers and providers defined upskillers as existing employees with varying degrees of prior learning. This was a broad apprentice typology, encompassing a range of ages, career stages and apprenticeship levels. Some employers and providers noted two main categorisations of upskiller apprenticeships: lower level apprenticeships which support in-work progression; and, professional development for staff in technical and higher-level roles. The key characteristics of upskillers identified included:

- A level of prior experience within their specific role.
- A wide range of ages, usually over 19 years old.
- Having demonstrated commitment to their career path and therefore a less 'risky' investment for employers than career starters.
- A range of learning abilities and support requirements: upskillers in higher level roles are more likely to be experienced, adaptable, independent learners. Upskillers accessing lower level apprenticeships may have barriers to re-engaging with learning, particularly functional skills.

The levels of apprenticeship accessed by upskillers was influenced by their employer's approach to identifying apprentices. Those with less established apprenticeship programmes tended to offer apprenticeships at a wider range of levels and standards, in comparison to employers who strategically targeted specific roles at a defined level. Some training providers reported that staff who were enrolled on apprenticeship training as part of a wider cohort could be less motivated than individuals who put themselves forward for consideration, following employer promotion of apprenticeship opportunities.

Some employers strategically invested in apprenticeships for their staff at levels 2 and 3 so they could learn key skills and progress in their industry. In these instances, employers reported that the levels of apprenticeship reflected the employees' functional skills abilities and role responsibilities. Examples in the research included adult care worker, hospitality team member and supply chain operative standards. There was a perception that these staff were likely to benefit from the wider soft skills development opportunities and functional skills learning that apprenticeships offer. Learning and development for staff at lower levels was also used to improve employee engagement, retention and progression.

Most employers and providers reported apprenticeships at levels 3 and above being used for professional development for staff in higher level and technical roles. Providers noted an increase in upskilling staff in more technical and higher level roles, particularly

those undertaking team leader or project management standards at level 3 or level 5 and above. In some cases, employers were upskilling all of their managers based in England. The key reason given for upskilling managers was to address skills gaps among those who have progressed into leadership roles, although several employers and providers highlighted that mass-enrolment of certain roles was also driven by a desire to spend the levy.

Career changers

Most employers and providers did not have experience of offering apprenticeships to career changers, although this varied by sector, with examples in social care, construction and HR roles. Where career changers were discussed, they tended to be individual cases rather than broader typologies. The key features defining this type of apprentice based on respondents' experiences included:

- A wide range of ages. Younger career changers can more easily fit a 'starter' typology. Career changers with substantial work experience tend to be older, usually over 25 years old.
- Likely to have transferable skills from previous roles including good workplace skills and behaviours.
- Older career changers are unlikely to have accessed formalised learning for many years.
- Highly motivated. Some providers state that career changers tend to access the same types of apprenticeships aimed at career starters due to their lack of prior knowledge in a specific role or sector.

In the construction industry [...] they're changing their roles, moving from admin to buyers, and quantity surveyors, from trade into quantity surveying, where it's a completely different role. So, for us, it's equivalent to a new start. – *Provider*

Some employers and providers contended that older career changers were more likely to apply for an entry level job rather than an apprenticeship, due to the low pay and the stereotype of apprentices being for young people.

You get people in who are seventeen, eighteen or younger on apprenticeships [...] the older people looking for a career change will just apply for the job. – *Employer*

Some respondents highlighted that because an apprenticeship must directly correlate with an individual's job duties, it is not easy for existing staff to use an apprenticeship to change careers. Career changers featured in this research tended to have engineered

their own career changes, through self-funding courses or taking a pay cut to access an entry level role prior to accessing their apprenticeship. Case study 2 below (see page 27), demonstrates how one apprentice, who was previously a restaurant manager, took an entry level role working in a design department of a large packaging manufacturer and is progressing in this new sector by upskilling through an apprenticeship.

Case study 2 - Upskilling in a new sector³¹

Helen works for a large packaging manufacturer which employs approximately 2,000 staff in the UK. Her employer pays £300,000 in apprenticeship levy and employs over 100 apprentices, across levels 2 to 6 and in a range of areas. Helen is currently completing a level 3 apprenticeship in digital printing. She is aged 27 and was an existing employee prior to starting her apprenticeship.

Helen changed careers, moving from restaurant management to working in the design department of a large packaging manufacturer. The HR director at her current employer suggested that she undertake an apprenticeship and Helen had a meeting with her employer and a training consultancy to review different programme options. She chose a programme run by a specialist independent training provider. Prior to starting the apprenticeship, Helen discussed her prior education, qualifications and skills with the training provider. The provider had an in-depth discussion with Helen about her job role and how the apprenticeship could be tailored to suit her work.

The [provider] has been absolutely superb, I've been really, really impressed with them. They've come in and spoke with the learner and HR manager to understand what the learner needs to learn and advise us which course would achieve that best. That was more what I was hoping for, than the more blanket approach that we did for a larger cohort of learners. – *Employer*

Helen considers the majority of her apprenticeship content to be new and has found it to be beneficial in developing her skills.

I've learned a lot more about print [...] it's helping me learn the facts of what needs to be done beforehand so that we don't have to keep going back and forth and go through different people. – *Helen*

The key success factors of the apprenticeship were:

- An apprenticeship being used to upskill a career changer in a relatively new field.
- Bespoke assessment and provision from a specialist training provider.
- Choice of an appropriate apprenticeship that is beneficial to the job role.

³¹ This case study was developed from 'matched' interviews with an apprentice and their employer.

Views of typologies

Employers and providers recognised the three apprentice typologies, although they had varying degrees of experience with each type. Overall, employers and providers reported the ‘career starter’ typology as the most clearly definable, while upskillers had a more varied profile and were reportedly more difficult to ‘group’ by characteristics. Career changers were recognisable as a category, although they were the least common type of apprentice.

Most employers and providers considered these typologies to be a useful framework for the assessment of prior learning, as it helped frame the extent of knowledge, skills and behaviours each type was likely to have. However, most employers and providers also noted that apprentice characteristics are becoming increasingly diverse, with different ages, career stages and levels of prior learning within each type. This means as participation in apprenticeships grow, categories are becoming less discrete given characteristics between categories increasingly overlap.

Some providers suggested additional typologies to fit the different knowledge, skills and behaviours of potential apprentices, such as a categorisation for higher level and degree apprenticeship starters. These higher-level starters could have limited work experience, but a higher level of knowledge and potentially more mature behaviours than more ‘traditional’ younger career starters who start at lower levels. Another suggested categorisation was ‘career returners’, to include those returning to the labour market with existing prior learning from several years ago, some of which was no longer relevant or useable. This was particularly recognisable in sectors with a high degree of digital or technical skills such as engineering but was also noticeable in more theory-based apprenticeship programmes, such as leadership and management.

Other employers and providers argued that the most meaningful way to define apprentices was by sector, rather than career stage. Generalist training providers who delivered a range of apprenticeship programmes were most likely to report considerable variations in the profile of apprentices accessing different standards.

Some respondents also recognised a diversification of ages among all apprentice types and an increase in older apprentices (over the age of 40) since the introduction of the levy. Some of these respondents reported that older apprentices could face particular barriers to accessing and completing an apprenticeship such as:

- Unfamiliarity with learning due to time away from formal education, which can result in a need for academic support.
- A lack of confidence in functional skills, particularly if these have not been tested or regularly utilised since completing education.

- Likely additional time pressures outside of work, with implications for their ability to study outside of working hours.
- Increased financial responsibilities, with implications for their ability to live on an apprentice wage; and,
- A perception of insufficient return on investment due to their age.

We don't get a good uptake with older people, because a lot of them are thinking, 'well I'm going to retire in three years, why do I want to put myself through that?' I've got very few people that see it as an exciting challenge. – *Employer*

These findings highlighted that while the typologies of career starter, upskiller and career changer were recognisable to employers and providers, some responses reflected a more nuanced picture. This suggests that these typologies should be understood as provisional and dynamic, and likely to change in response to changes in employer behaviour, apprenticeship policy and perceptions of apprenticeships.

2.4 Implications of levy payers' decisions

Most employers and providers agreed that apprenticeships were equally suited to all typologies of apprentice, and that the employer-led development of standards has resulted in a wide-ranging offer for people at different stages of their careers. These interviewees expected this diversification of apprentices to continue with the rise in higher level and degree apprenticeships, and with changing perceptions of who can access apprenticeships. However, several respondents also believed that the programme may not be sufficiently flexible for all employers. One provider suggested that employers would find the co-funded level 2 provision funded through the Adult Education Budget³² more appealing as it does not require functional skills and 20% off-the-job training requirements. Below, explores the implications of levy paying employers' decisions for different types of apprentice, namely career starters, upskillers, and career changers.

³² The Adult Education Budget refers to the budget available for publicly funded adult education offers. From August 2019, adult education functions are devolved to specified combined authorities who will decide on spend. The main categories of funding include: Full funding for 19+ English and Maths who do not have A*-C GCSE; full funding for 19-23 for a first full Level 2 or first full Level 3 and co-funding up to and including level 2 for other learners.

Implications for career starters

Several employers and providers noted that apprenticeships provide a range of benefits to career starters because they offer training and support that foster the development of transferable as well as specific skills, and form a basis for further progression.

Most career starters believed that an apprenticeship was the right option for them, citing the associated level of support and feedback from managers and training providers as helping them to build their confidence.

I didn't know anything about banking before I started [...] but now that I've done all of this training and I've completed on the job training I have come quite a long way and now I'm looking more at becoming a mortgage advisor. Which is crazy, because if I looked at that two years ago, I never would have thought about it [...] it is just the confidence [...] I'm getting good feedback from my managers about the work I'm doing [...] it's really, really helped me. – *Apprentice*

Despite these potential benefits, some employers and providers identified a range of disincentives to working with career starters. Career starters were sometimes viewed as an 'untested' risk for employers, particularly those with smaller levy pots and/or pressure from their board to get the quickest return on investment. Some employers reported difficulties with retention of career starter apprentices, particularly if there were alternative entry routes to the labour market that provided higher rates of pay or reduced demands. Others reported that career starters did not match the employee profile that businesses sought to recruit, particularly in professional, scientific and technical industries where employers typically recruited individuals with degree level or postgraduate qualifications. For providers, barriers to working with career starters included the lack of level 2 standards available and insufficient funding to offer more intensive mentoring and support which some career starters required. Some providers also highlighted the potential disincentive to recruiting younger apprentices, following changes to funding policy that removed higher funding rates for apprentices aged 16-23.

We run agriculture [apprenticeships]. Some of the machinery they have to use at level three [...] is more than £100,000 worth of machinery. Would you let a sixteen-year-old on it [...] employers don't want that, but there's nothing at level 2 for them. – *Provider*

Those that are making their first career steps [...] require more input and support [...]. You used to get increased amounts of funding if you were working with sixteen to eighteen or a nineteen to twenty-three year olds [...]. Now that's gone [...] I would say training providers are being penalised if they engage with recruited learners. – *Provider*

Several training providers expressed concern about the limited opportunities for career starters to access apprenticeships, in comparison with the availability of opportunities for existing staff who were already highly qualified.

When you've potentially got people on wages of over £100,000 engaging in degree-level apprenticeships where the CPD budget could stretch to it, and it is being used as an alternative for funding, I'm not sure what that communicates. – *Provider*

If there's not a step change by the Institute [for] Apprenticeships and with trailblazers focusing on level 2 then I can only ever see a greater focus being on the use of apprenticeships for continuing professional development [...] and I can only see that being a barrier to recruited apprentices, young people into job roles. – *Provider*

Implications for upskillers

While employers were most likely to use their levy to upskill existing staff, tensions exist within the apprenticeship programme that limit accessibility for some employees. Several employers, providers and apprentices reported that fitting in 20% off-the-job training with an existing workload could be difficult both for the business and the apprentice themselves. This challenge is exacerbated in some time pressured sectors or roles and tended to increase with seniority. Some respondents reported dropouts as a result of an apprentice's inability to balance the demands of their apprenticeship with their day to day workloads.

What's left of the cohort has disengaged [...]. We just didn't have the time to commit to do this [...]. We didn't necessarily stick to the schedule because to some degrees it was unrealistic for us where we devoted three to five hours a week to it. It just wasn't feasible [...]. I was supposed to complete a weekly journal, but you work in a very busy, demanding role, you've not always got the time, you slip behind, that happened to a lot of people. – *Apprentice*

Ineligibility for an apprenticeship because of prior learning was another issue for employers seeking to upskill committed staff. In a small number of cases, mainly concerning low level apprenticeships, providers and employers reported that adjusting for prior learning would result in a training programme of less than 12 months, making staff ineligible to undertake the apprenticeship. For sectors with higher turnover, such as care, retail and hospitality, this highlighted a tension between ensuring individuals are committed members of staff and their eligibility for an apprenticeship.

Implications for career changers

Most employers and providers reported having limited experience of offering apprenticeships to career changers, noting a range of barriers to using the apprenticeship programme to change sector. The main barrier was the 12-month minimum length of an apprenticeship, which was viewed as undesirably lengthy for career changers, particularly where this involved a prolonged reduction in pay.

Some providers regarded career changers as a relatively 'untapped' pool of people who could move straight into an apprenticeship. However, such apprentices feature less in employers' existing business strategies which predominantly focus on upskilling or recruiting individuals with relevant experience, or as career starters.

2.5 Cross cutting drivers of behaviour for levy spend

Discussions with employers and providers sought to examine the drivers affecting the decision-making and behaviours of levy paying employers. These behavioural drivers can be categorised into capabilities, opportunities and motivations³³. These categories were used to explain why behaviour occurred: in order for someone to engage in a particular behaviour, they must be physically and psychologically able (capabilities), have the social and physical opportunity (opportunities) and desire to do the behaviour, either out of choice, or subconsciously (motivations). These factors do not operate in isolation and can positively or negatively reinforce one another. The strongest drivers of behaviour occur when capability, opportunity and motivation are mutually reinforcing.

Findings indicated that employers were largely driven by business related motivations, which were enabled or constrained by the apprenticeship programme itself, as well as by business capacity. A lack of knowledge about the levy and apprenticeship eligibility was evident among some employers and appeared to impact on their capability to spend their levy funds.

Capabilities

Capabilities refer to the knowledge and skills which shape decision making. In this context, an employer's capability includes their understanding of the levy and their level

³³ This approach (known as COM-B) is a recognised approach to understanding behaviours. The development of this model is explored here: Michie, S., Van Stralen, M., West, R. (2011). [The Behaviour Change Wheel: a new method for characterising and designing behaviour change interventions](#). Implementation Science.

of familiarity with apprenticeships. These factors impact on the extent to which employers consider the use of apprenticeships for recruitment and development of staff.

Several providers noted that employers with an established history of apprenticeships were more likely to view the levy as an 'opportunity' to build upon their offer. Those with less experience of apprenticeships were likely to view the levy as a 'cost' and were less capable, at least initially, of deciding how best to utilise the levy within their organisation. Knowledge gaps about how the levy can be used were particularly evident among employers who did not have an apprenticeship offer before the levy was introduced.

A lack of knowledge about apprenticeships and a desire to ensure a return on investment before making large scale investment were key factors behind employer cautiousness. This particularly impacted employers' plans to recruit new staff as apprentices, which was regarded as a higher risk than enrolling existing staff. Employers with longstanding apprenticeship programmes were more likely to recruit career starters, particularly at scale, than employers who had not previously offered apprenticeships.

Some employers reported that a lack of confidence in unknown processes, such as end point assessments, limited their promotion of the offer to staff. Similarly, several employers and providers noted that HR staff could feel less confident in using apprenticeships to recruit staff when the levy was not being widely used in an organisation. Employers with limited knowledge of apprenticeships could be influenced by the expertise of individuals. Indeed, some employers hired consultants or a specified employee to guide levy spend. These consultants reported educating HR staff who had misconceptions of apprenticeships being lower level qualifications, or for younger people only.

First thing is to get the plant managers and HR managers to think about recruiting apprentices. It's not necessarily been the norm for them in the past. It's been a bit of an education process. – *Employer*

They [employers] didn't know you can do an AAT level 4, or management level 5 or 6, HR level 5. We ran a big awareness programme on higher level apprenticeships, rather than spend thousands on a degree, they can do it via the apprenticeship, and it's funding as part of their levy. – *Provider*

Opportunities

Employers' decision making was predominantly shaped by the environment that they operate in, and to a lesser extent, by social norms. Environmental influences included the size of an employer's levy contribution, the rules of the apprenticeship programme, the availability of standards at appropriate levels, and business constraints.

Employers with a larger levy contribution were often keen to expand their apprenticeship offer as much as possible. Conversely, employers with a smaller levy pot often displayed higher levels of risk aversion, and their future plans were more likely to involve continuation with the same number of new starts, or replenishing apprentices as they completed.

The business context that the employer operated in was also significant in shaping how employers spent the levy, with business growth a key factor in choosing to use levy funds to recruit career starters. Most employers and some providers mentioned using the apprenticeship levy to upskill existing staff, and identified recruitment constraints, low staff turnover and limited growth as factors preventing them from focusing investment on new recruits.

The employer's internal capacity to support apprentices was also a consideration, particularly when recruiting new, inexperienced staff. In comparison, existing employees were felt to have lower support requirements.

It's the sites being able to support them and having the right environment [...]. I'd like to have hundreds more, but I don't want to put anybody in a situation where we set them up to fail. – *Employer*

Finally, the apprenticeship programme itself had an impact on employer decision making. The availability of standards influenced both the level of demand for apprenticeships from staff and employers' ability to utilise these in their core business. While some employers were looking into the possibility of developing new standards, others felt that this was too complex or time consuming. Other considerations related to the rules governing the use of apprenticeship standards: the minimum 12-month duration; inclusion of functional skills assessment, teaching and learning; and, 20% off-the-job training. These rules presented varying opportunities and challenges depending on the sector, roles and individual ability to meet these requirements. For instance, employers with high proportions of fixed-term vacancies could not enrol those staff on apprenticeships. Certain occupations, such as teaching, presented additional barriers for apprentices and their employers in accommodating 20% off-the-job training in a working day.

Motivations

Employers' decisions were also shaped by both reflective and automatic motivations. Reflective motivations include plans and evaluations, whereas automatic motivations refer to more reactive impulses.

The research findings indicated that employer behaviour was overwhelmingly driven by business interests, such as financial sustainability, workforce development and (to a lesser extent) corporate social responsibility. This was a reflective motivation that

influenced whether employers used the levy to upskill existing staff and/or recruit new staff. For example, employers who participated in this research often made decisions based on motivations to improve staff engagement and retention, fill skills gaps, prepare their workforce for sector changes, train early career talent and/or increase the diversity of their workforce.

Reflective motivations were demonstrated where employers learned from and made changes to their apprenticeship offer to better support their staff and business priorities.

Initially, we tried to apply a blanket and one case fits all by saying, 'Let's train all our team leaders and production operatives', but it didn't really work well because everybody has different levels of skills and experiences. So, we decided that we needed to look at it a bit closer and be more individual about it. – *Employer*

Employers' automatic motivations included a desire to spend the levy in the most straightforward way to recuperate their funds. Several employers and providers noted that it was 'easier' to spend the levy through mass enrolment of existing staff, or through the use of higher levels at more expensive rates, than it was to do so through recruitment and supporting career starters, unless the recruitment routes were well suited to the existing apprenticeship offer. Employers' haste to recover money intensified when there was a substantial levy pot and pressure from finance directors and company boards to use it.

A further automatic motivation was employers' level of support for the apprenticeship programme. Some employers, without a tradition of apprenticeships, held misconceptions about the suitability of the programme for their business and lacked motivation to challenge these. Employers with an established history of apprenticeships tended to be more highly invested in the programme, driving them to dedicate more time to develop their offer.

2.6 Anticipated future trends

Some employers and most training providers predicted that apprentice starts at higher levels would continue to rise, particularly at level 4 and above, with degree apprenticeships recognised as the 'pinnacle' of apprenticeships. Several employers reported plans to develop level 7 Senior Leader apprenticeships (often referred to as MBA qualifications) for executive leaders across a range of sectors including recruitment, third sector organisations, education, aerospace and engineering technology.

Most employers who utilised the levy only for existing staff were keen to continue to spend the levy on upskilling staff. Employers with small numbers of existing staff on apprenticeships also recognised the benefits of this approach and planned to expand

investment, for example into leadership and management apprenticeships. Some employers were keen to expand their offer to new recruits, and providers anticipated that this would become more common as employers' awareness of this option develops.

Overall, both employers and providers noted that apprenticeship decision making was relatively new and often not yet fully 'embedded' in workforce planning or development. As such, it was anticipated that strategies to spend the levy would change, as more standards become available and employers better understand how they can use the levy.

A small proportion of employers felt that they would be unable to embed apprenticeships within their business strategies without significant change to the apprenticeship programme. These employers were considering transferring their levy, developing new standards, or lobbying for more flexibility in the use of the levy.

Availability of standards

Employers expected a wider range of standards to become available, ensuring that the apprenticeship offer develops to meet business needs. However, some training providers expressed concern that several standards would become financially unviable to deliver unless funding bands were raised. For example, one provider was unable to deliver a bespoke course based on the management standard for the food industry due to reduced funding caps.

There's already been a drop in funding caps for some of the standards we chose to deliver. We aligned our own bespoke qualifications [...] and as of this September coming, we can no longer put a foundation degree in with the Level 5 because it's dropped from £9,000 to £7,000 [...] innovative [...] that the industry had agreed. But we've now had to take that away it's not possible to deliver a foundation degree for £7,000 within an apprenticeship structure. I have a level three programme in two years which is £18,000 cap, and I have a level five programme which is two and a half years, but it's £7,000 cap. – *Provider*

Some providers predicted that expensive higher level programmes currently in development (costing more than £20,000) will shape how employers spend their levy. They perceived that an increase in the availability of higher level and higher cost standards may force employers to become more selective in their use of apprenticeships and prioritise areas of importance within workforce development. There was concern from some providers that this may limit the diversity of people able to access apprenticeships. Providers anticipated that higher cost apprenticeships would be taken up by senior staff, while those in less senior roles could struggle to access apprenticeships unless there was a specific business need. Some training providers

noted that this reinforces other concerns about the lack of level 2 standards, which were previously used to provide a pathway to apprenticeships for young people.

2.7 Chapter summary

The research findings indicate that employers are largely using their levy to upskill existing staff, rather than recruiting younger career starters or those seeking to change career. The research also confirms a general preference towards apprenticeships at higher levels.

Employers tended to be motivated by financial decision making and recouping the full levy spend was a recognisable objective. Employers often regarded the levy as the 'first port of call' for training and there were several examples of the levy directly replacing training that employers had previously offered. Most employers felt that apprenticeships had a positive impact on access to, and quality of, training within their organisation. However, the apprenticeship offer was not always suitable to meet staff and business need. Key factors which impacted on the suitability of apprenticeships included their duration, requirements for 20% off-the-job training, and functional skills assessments.

Employer familiarity and understanding of apprenticeships impacted how they choose to utilise the levy. However, the main driver of employer behaviour related to business needs which varied depending on a range of contextual factors. Business constraints particularly impacted an employer's ability to recruit new starters as apprentices. In comparison, upskilling existing staff was perceived by most employers and providers as an 'easier' way to spend their levy.

While it was recognised by most respondents that apprenticeships offered a route for individuals seeking to retrain, there were far fewer examples of apprenticeships being used to support career changers. Concerns were raised by both employers and providers about the suitability of the apprenticeship offer for this group, particularly the length of the programme and the extent to which it could account for transferable skills.

3. Assessment of prior learning

Assessment of prior learning is vital to ensure apprenticeship quality, the development of new skills and value for money. Assessing and recognising the prior learning of an apprentice should extend beyond English, maths and existing qualifications encompassing all the knowledge, skills and behaviours set out in an apprenticeship standard. This chapter outlines the different approaches used by respondents to assess prior learning, summarising provider views around effectiveness, key challenges, elements of good practice and future plans. While the chapter is mainly informed by findings from provider interviews, employer and apprentice views have been incorporated where they provide valuable contrasting and/or additional perspectives. The findings draw out variations across career starters, upskillers and career changers.

3.1 Approaches to assessing prior learning

Providers took a diverse range of approaches to assessment, which were administered across one to three stages and involved different teams working in the provider organisation. Several providers developed skills scans which break down knowledge, skills and behaviours relevant to the specific standard the apprentice is being assessed against. Other methods administered by providers, which were often combined into a multistage process, included:

- An application form (often as part of the preparation for the initial assessment);
- A telephone or face-to-face assessment interview, sometimes with a specialist assessor;
- An English, maths and IT online test;
- A tripartite meeting with the apprentice, employer and provider; and,
- A business development meeting with the employer to discuss expectations and requirements.

The majority of assessments took place prior to recruitment of the apprentice; sometimes there was a more detailed second-stage assessment after induction. However, several respondents reported that the prior learning assessment took place after the apprentice had started their programme.

Table 1 below, provides a summary of the features of initial assessment with one, two or three stage approaches.

Table 1: Features of initial assessment process

Number	Characteristics	Examples
1	Rare, light-touch	<p>Provider completes a skills scan with an individual. The individual completes English, maths and IT skills assessments (online or paper-based).</p> <p>Provider assesses prior learning by looking at the apprentice's certificates and maps to the apprenticeship standard.</p>
2	Most common, general assessment sometimes involving the employer	<p>An apprentice applicant completes a generic assessment or an application form, followed by a detailed skills assessment administered by a specialist assessor.</p> <p>Provider and employer have a business development meeting to discuss apprenticeship requirements, followed by a face-to-face tripartite meeting to assess an individual's prior learning against the job description.</p>
3	Rare, comparatively most comprehensive	<p>Initial information gathering: provider conducts a generic information, advice and guidance (IAG) appointment with an individual <i>or</i> an employer provides the apprentice job description to the provider.</p> <p>In-depth assessment stage: provider conducts a detailed individual skills assessment, which subsequently feeds into employer discussions about cost.</p> <p>Tripartite meeting: provider meets with the employer and individual to reach agreement about the extent of prior learning.</p>

As Table 1 above illustrates, there was substantial variation in the quality and robustness of the approaches to initial assessment described by respondents. Some described light-touch processes, which focused heavily on assessing qualifications or functional skills, with minimal emphasis on vocational behaviours and competencies. Other more comprehensive assessments of prior learning comprised in-depth and multistage processes with employer involvement, which focused on behaviours and workplace competencies in addition to qualifications and English, maths and IT skills.

While providers described different approaches to the assessment of prior learning, robust examples of practice, as well as more light-touch examples, were described by

providers of all types³⁴. Although based on small numbers, a slightly higher proportion of light-touch approaches were described by ITPs in comparison to general further education providers or specialist colleges. The evidence collected indicates that ITPs may be more likely to administer the assessment of prior learning after the apprentice has already started their programme, often during their induction, and to focus narrowly on qualifications, English and maths in their assessment.

Learner-facing staff, such as those working in providers' curriculum teams, were often responsible for administering and reviewing apprentices' skills scans and other assessments. Providers' business development teams, or directors of smaller independent providers, tended to be involved in discussions about employers' business interests and requirements. The involvement of several teams in the different process elements can result in the discussions about individual prior learning being separate from employer led discussions about cost and practicalities. The implications of this can be that adaptations to apprenticeships are not reflected in the cost.

Employer involvement in the assessment of prior learning also varied. Employers involved in the process generally participated by ratifying a provider's assessment of an existing staff member and/or informing the provider of their training or workforce development requirements. In some cases, however, the employer did not play a role in the process; rather, assessment relied heavily on the individual apprentice's input. These issues could be barriers to achieving a joined-up approach whereby cost is appropriately reduced to account for prior learning.

Case study 3 below (see page 41) exemplifies a light-touch approach to assessing prior learning conducted by the provider. It largely involved a short telephone call and a focus on certification, which the employer viewed as being too narrowly focused on qualifications, rather than the application of skills in the role. However, the case study also describes the employer operating a pre-screening mechanism to ensure that the apprentice gained appropriate skills from the apprenticeship.

³⁴ Two main types of training organisations were included in this research – further education colleges and ITPs, which can be in the private or voluntary sector. The sample frame for this research can be found in Appendix 1.

Case study 3 – Assessment focused on qualifications³⁵

Claire works for a large third sector organisation, which employs around 2,000 staff and pays £250,000 apprenticeship levy per year. Claire's employer currently offers a range of apprenticeships, including management apprenticeships at levels 3, 5 and 7, which are being rolled out to all managers across England. Claire recently completed a level 3 team leader/supervisor apprenticeship. She is 58 years old and has worked for her current employer for 14 years, with several years' experience as a line manager.

Claire completed a level 3 Ordinary National Certificate³⁶ in Business Studies 25 years ago and her motivation for doing the apprenticeship was to update this knowledge. She submitted a business case outlining the individual and organisational benefit of the apprenticeship. Once this was approved, Claire's prior learning was assessed via a high-level telephone discussion with the training provider, which mainly focused on her formal education. Claire also completed functional skills tests because she did not have copies of her English and maths certificates.

Claire was satisfied with the assessment process but felt that the business case process and employer understanding of her skills was the main reason the apprenticeship met her needs. Claire's employer views the prior learning assessment process as being too focused on qualifications and would prefer the assessment to include the extent of application of knowledge and skills in the role.

The content of Claire's apprenticeship programme was adapted through regular meetings with a coach to ensure the learning was contextualised. This coaching offer was the key reason for the employer's choice of provider. Claire believes the apprenticeship was the right level for her current role and responsibilities and found the learning valuable to update her outdated management training. She described several wider benefits such as increased self-confidence, job security and improved work performance.

I've been managing staff for a number of years [...] but any management training I had was 25 years ago [...] the terminology and vocabulary of current management thinking [...] was really new and helpful. – *Claire*

The key success factors of the apprenticeship were:

- The apprentice's prior learning was outdated, so all learning was new.
- Employer understanding of capability and pre-screening.

Variations by type of apprentice

Most providers reported that the initial assessment process was the same regardless of apprentice type, and most apprentice interviews confirmed that a similar assessment process was undertaken. However, some aspects of difference that emerged in apprentice and provider accounts of prior learning assessments included:

- There appeared to be a higher level of employer involvement in the assessment process for upskillers, than with other types of apprentices. Most providers stated that it was important for employers to confirm (and have recognised) the extent of an apprentice's self-reported prior learning, particularly non-accredited knowledge, skills and behaviours learned through work.
- Providers placed a greater emphasis on the assessment of transferable skills for career changers than they did with upskillers and career starters. This was necessary to ensure that transferable skills were accounted for, as this group were likely to have less directly relevant qualifications or non-accredited learning.
- In comparison to other apprentice types, providers reported that there was less value in conducting an initial assessment with career starters because they had less prior learning to assess. Some providers did not ask career starters to complete a skills scan, whilst others relied more heavily on an apprentice's qualifications as they often had limited or no work experience. The assessment process for new starters was also likely to be more trainer-led than employer-led and included a more detailed explanation of the content of the standards. This helped to inform the apprentice as to the content, skills and behaviours of the apprenticeship being undertaken.

3.2 Views of effectiveness of prior learning assessment

Generally, employers considered that assessment of prior learning was effective and was working well on the basis that they had not experienced any issues. For example, no employers reported having apprentices who were overqualified for the apprenticeship programme.

³⁵ This case study was developed from 'matched' interviews with an apprentice and their employer.

³⁶ An Ordinary National Certificate (ONC) is a further education qualification in the United Kingdom, awarded by BTEC. It is at Level 3, equivalent to A Levels.

A small proportion of employers reported that the effectiveness of assessment varied depending on the provider. Two employers described the assessment as poor, and one of these believed that their providers were not conducting prior learning assessments.

I think the answer is 'very badly, very poorly'. I actually asked [one provider] [...] 'Is there any example out of 200-plus apprentices where you've actually said, 'There's prior learning here that we need to take into account?' And there wasn't one single example. So, I personally don't believe the training providers are doing it. – *Employer*

A minority of providers believed that the initial assessment process was highly effective because they took a rounded approach that assessed apprentices' real-life competency through functional English and maths skills testing. However, most providers viewed the initial assessment as an effective *guide*, rather than a precise measure of knowledge and skills. The assessment gave the provider sufficient information to shape the programme around the apprentice; however, it did not provide a comprehensive picture of an apprentice's prior learning before they started the apprenticeship.

When a learner is on their learning programme [...] a big part of [assessment of prior learning] is observation and actually seeing them in action so whilst you might ask a question: 'How good do you feel or what's your level of knowledge in this area?' [...] until you see it in practice, you can't take that as the only guide - *Provider*

Apprentices' opinions on the effectiveness of the initial assessment were split. Generally, apprentices were more likely to have confidence that their employer understood their prior learning, but were less confident in the provider's understanding. These apprentices' confidence in their employers' understanding was on the basis that their employer had robust recruitment or selection processes in place or already knew their skillset and experience because they were an existing employee.

I've been working here two and half years [...] I have had plenty of conversations about [my prior learning] [...] when you're an electrician [...] you rely on your experience a lot and it becomes quite evident quite quickly if you don't have any. – *Apprentice*

Other apprentices believed that both their employer and provider had a good level of understanding of their prior learning, although confidence in the provider's understanding was underpinned by the assumption that their employer had passed on information. It was less common for apprentices to express confidence in the provider's understanding of their prior learning based solely on the initial assessment led by the provider. A small minority of apprentices had little to no confidence in the assessment process and

believed that neither the employer nor the provider had a sound understanding of their prior learning. For these apprentices, their lack of confidence was often because they were not asked about skills gained through previous work experience during the initial assessment, or that the assessment itself was vague:

It was never really discussed, it wasn't like a 'what do you know, what don't you know', it was just a 'what grades have you got and then let's go, let's get you learning'. – *Apprentice*

Factors underlying differences in assessment effectiveness

Timing, depth, the level of assessor knowledge and skill, and the extent of employer engagement were all factors that varied substantially across different assessment processes, and directly impacted on their overall effectiveness.

Timing of assessment

Most providers believed that an early initial assessment was beneficial as it provides an opportunity for them to meet potential apprentices before they are recruited and to share expectations. It also helps to ensure that the apprentice is enrolling on to the most appropriate standard, at the right level, in line with their previous experiences and career aspirations. This is important given recently published (small-scale qualitative) research commissioned by the DfE suggesting a gap between an applicant's expectations and the reality of an apprenticeship can be a potential contributing factor in apprenticeship non-completion³⁷.

Specialist assessors

Some providers and apprentices, as well as a small minority of employers, emphasised the importance of provider staff who conduct the initial assessment having specialist subject knowledge of the relevant standard and sector. Providers and employers believed that specialist assessors were more likely to fully understand whether an apprentice has prior learning in the subject area than assessors with generalist knowledge only. Apprentices reported increased confidence in the assessment process when the person who assessed them understood their job role and their sector. For example, one employer from the manufacturing sector gave an example of good practice in relation to a team leader standard that some of their employees were enrolled on. The provider they worked with employed industry specialists to conduct the assessment of prior learning and deliver the content, rather than generalist trainers:

³⁷ Kantar Public (2019) [DfE Learners and Apprentices Study: Reasons for noncompletion](#) Qualitative research report. Department for Education

I think it was because they are from industry [...] so they had a good overall knowledge, they could ask, 'Do you know about X, Y, Z, because if you don't, I'll teach you on this course?'. – *Employer*

Some respondents believed that industry specialists were best placed to assess apprentices' prior learning, as they were more likely to understand what their job roles look like in practice within that sector, and could ask apprentices the right questions during assessment and tailor the content of the apprenticeship accordingly. Conversely, a small number of employers felt that providers with generic offers may not understand the sector or industry sufficiently to probe in depth about prior learning.

Depth of assessment

The extent to which providers could gather an accurate profile of an apprentice depended on the depth of the assessment, and the ability of the assessor to skilfully facilitate the process. An assessment such as a skills scan, focused on competencies and behaviours (not just on qualifications and certifications) helped to produce a more in-depth account of an apprentice's prior learning, particularly when the outcomes of this assessment were checked by an employer. Skills scans could inform trainers' decision-making, enabling them to make decisions about borderline cases, for example when they were unsure whether the standard is at the right level for the individual apprentice.

Additionally, some providers reported that helping apprentices through the process rather than asking them to complete the assessment by themselves increased effectiveness. A great deal of discretion, skill and professional judgement is required to conduct the assessment of prior learning effectively. Assessors needed to ask the right questions in the right way to enable apprentices to feel comfortable to openly discuss their prior learning. Facilitation skills were seen as especially important for assessors working with particular apprentice groups, including those with low confidence or higher anxiety, as well as those with more experience who did not realise the extent of their prior learning:

It's more about the person that's asking the questions [...] asking the correct type of questions [...] you can have two different people ask the same question but I think it depends on how you're asking these things and what [...] extra bits that you need to ask [...] to be able to weed this information from the learners. – *Provider*

Case study 4 below (see page 46), describes an employer-provider's in-depth approach to a prior learning assessment for an apprentice with a high degree of prior learning and several years' experience in the role. This robust three-stage approach enabled effective adaption of the apprenticeship to both reflect prior learning and suit apprentice need.

Case study 4: In-depth prior learning assessment³⁸

Sofia works for a large public sector employer-provider in the healthcare sector. This organisation employs and trains up to 100 apprentices, predominantly in health and social care and support roles such as finance and business admin. Most apprenticeships are at level 3, but it has also started offering levels 4 and 5. Sofia has recently completed her level 3 health and social care apprenticeship and is now completing a level 4 apprenticeship. She is 27 years old and was employed by the organisation for five years prior to starting her apprenticeship. Sofia had previously completed a degree in an unrelated field.

Sofia applied for her apprenticeship by submitting her CV, details of her qualifications, and a personal statement outlining her current role, reasons for applying and relevant experience and training to her employer. Prior to enrolment, she participated in a skills assessment day (including English and maths tests), followed by a one-to-one interview with the provider which included a discussion about prior learning. After being accepted onto the programme, but prior to starting, Sofia also completed an in-depth skill scan survey.

Sofia believes that the assessment process was effective, and the training team at the employer-provider have a good understanding of her prior learning. The employer-provider considers their assessment process to be fairly effective, although recognises that it is limited to a snapshot in time and is reliant on candidates' self-awareness.

Sofia is happy with the adaptations that have occurred to account for her prior learning, which were agreed in discussion with her assessor at the start of the course and during regular catch-ups. In addition to skipping a module that she had previously covered, Sofia is undertaking several modules at a higher level. Her assessments are also being marked to a higher language level than required to maintain her existing literacy skills.

[...] because some of that training was at a level I already could do, I was then allowed to go on training at the higher level [...] so I still developed my skills in that area. – *Sofia*

The key success factors of the apprenticeship were:

- A comprehensive three-stage approach to assessing prior learning.
- Suitable adaptations to programme content agreed between Sofia and her assessor, including skipping one module and undertaking others at a higher level.

The level of employer involvement

Some providers suggested that the assessment of prior learning was far more effective when responsibility was owned by both the provider and employer, and when there was good quality employer involvement in the process. The participation of an apprentice's line manager was considered particularly important for existing employees as they know where an apprentice might need development. An employer could also ratify or contest apprentices' self-assessment of their skills, knowledge and behaviours.

Ideally, a three-way conversation so that we can see [...] whether the learner's idea of their capability is slightly different to the employer's [...] especially if it's an existing member of staff. – *Provider*

One provider described a tripartite meeting between an apprentice, their line manager and their mentor as an essential part of their assessment process. This meeting acted as a 'backstop', increasing the assessment's overall robustness. The three parties could check that all prior learning was considered, and ensure shared expectations going forward.

While most providers considered employer collaboration useful in ensuring effective prior learning assessment, some providers highlighted a mismatch between the actual prior learning of upskillers and what was reported by their employer. These providers reported cases of employers both underestimating and overestimating the prior learning of potential apprentices. Some providers said that employers had purposefully overstated or understated prior learning to meet business need, for example understating an individual's prior learning to recruit an apprentice rather than a normal employee, or to consistently offer a certain level of apprenticeship to a cohort of staff. Other providers inferred that employers may not have a full understanding of individual apprentice's knowledge, skills and behaviours in relation to an apprenticeship standard.

Individual apprentice factors

Providers and employers also reported that effectiveness was highly dependent on individual apprentices, particularly with regards to the factors listed below which further highlight the important (skilled) role played by an assessor in probing apprentices to achieve as complete and balanced an assessment as possible of prior learning:

- Apprentice confidence: levels of confidence impacted on how apprentices describe their skills, knowledge and behaviours and could result in overstating or underplaying the extent of prior learning.

I don't think you'd ever get it perfect, because you're dealing with people, an individual. Some people end up putting on a show, some people are quieter and more factual. – *Provider*

- Desire to impress employers or providers: some providers observed that a desire to impress was particularly common among young people and new recruits, and could lead them to overstate their prior learning.
- Performance on the day: some providers and employers noted that the assessment is merely a snapshot in time, with outcomes determined by how an apprentice performs on the day of the assessment.
- Impact of learning needs: people with English language or additional learning needs may experience issues around accessibility and confidence when completing the assessment. Apprentices with low levels of digital skills can struggle if the provider uses technology to facilitate assessment.

Where English is a second language that can cause some challenges in terms of really understanding where a learner needs support. Where there are additional learning needs, whether that be anxiety, that can make the initial assessment process a bit more challenging. [...] The other thing we find, which is why we have an alternative solution [for assessment], is obviously technology. [...] Some learners are not used to doing things digitally. – *Provider*

- Purposeful misrepresentation to access an apprenticeship: a small minority of respondents described that some apprentices purposefully misrepresent their prior learning to access an apprenticeship they would not otherwise be eligible for. One provider that delivers broadcasting and content creation standards reflected that some apprentices have media studies degrees but did not disclose this until they were employed, because they wanted to get into the sector and knew that they could not use the apprenticeship route with this prior learning.

Case study 5, below (see page 49), includes the perspectives of an apprentice and their training provider and describes an instance of an apprentice potentially overstating their prior learning to access an apprenticeship opportunity. This case study shows the impact of individual apprentice decision making, despite the provider's specifically designed skills scan and prior learning assessment process and employer involvement.

Case study 5 – Overstating prior learning to access an apprenticeship³⁹

Amina is completing a level 4 associate project manager apprenticeship standard with NewLearn, a training provider that specialises in IT and leadership and management apprenticeships. Amina is 26 years old and qualified to degree level in an unrelated subject. She worked at her company for three years before starting the apprenticeship and is their only apprentice. Amina works in an IT-based role and was not applying project management principles in her work before the apprenticeship.

Amina wanted to access an IT related apprenticeship to further her digital skills. However, NewLearn and her employer agreed a project management apprenticeship would be more beneficial to the company. After NewLearn and her employer met, Amina and her manager scored her current level of ability and exposure to competencies on a scale of 1-10 on the provider's skills scan document. The skills scan included practical examples of behaviours and competencies within the standard and sections for Amina, her employer and NewLearn to complete. Amina and her manager found the project management terminology in the skills scan unfamiliar and difficult to understand. However, Amina also felt she needed to overstate her experience and exposure to skills in her role to access the apprenticeship.

It felt a bit like, if I said, 'No,' to the questions, I wouldn't be able to go on the apprenticeship. [...] I might have over-represented what kind of access I was getting, because I wanted to go on the apprenticeship. – *Amina*

Amina has found the apprenticeship challenging and all learning has been new. NewLearn's coach has been adaptable to Amina's needs by authorising a break in learning and arranging external shadowing opportunities which weren't accessible in her own organisation. Amina feels that re-learning some content would be beneficial after her learning break, but has improved project management and communication skills since the apprenticeship started. However, she would have preferred her original choice of apprenticeship.

Key issues arising from the apprenticeship were:

- Potential for apprentices (and their employers) to try to answer assessments 'correctly', rather than truthfully.
- Need for providers to contextualise specialist language from the standards.

³⁹ This case study was developed from interviews with an apprentice and their training provider.

Effectiveness of prior learning assessment for different types of apprentice

A minority of providers reported that the effectiveness of the prior learning assessment did not differ depending on apprentice type. However, the majority described that they find it more difficult to effectively assess certain types of apprentice. Levels of confidence, maturity and self-awareness could vary greatly between individuals and apprentice type. Younger apprentices (typically career starters) tended to interpret the assessment as a test they must pass and were unwilling to admit to skills gaps. Other apprentices (typically upskillers and career changers) struggled to accurately recall their experiences or to identify transferable skills, particularly older apprentices with an extensive work history. This relationship is illustrated in Table 2 below:

Table 2: Impact of age and length of service on effectiveness of assessment

Status	Younger apprentices	Older apprentices
New recruits	<ul style="list-style-type: none"> • Less prior learning – more straightforward to assess. • May overstate abilities. • Employer cannot corroborate - potentially less accurate assessment. • Difficulties assessing work-based behaviours. 	<ul style="list-style-type: none"> • More prior learning – more complex to assess. • Employer cannot corroborate – potentially less accurate assessment. • May find assessment process daunting and understate abilities. • Transferable skills may not be accounted for.
Existing employees	<ul style="list-style-type: none"> • Less prior learning – more straightforward to assess. • Employer corroboration – potentially more accurate assessment. 	<ul style="list-style-type: none"> • More prior learning – more complex to assess. • Difficulties recalling relevant prior learning. • May find assessment process daunting and understate abilities. • Employer corroboration – potentially more accurate assessment.

Most providers reported that it was more straightforward to assess the prior learning of career starters, compared to career changers or upskillers. Career starters were typically younger and new to the role, with little to no work experience. As a result, it was easier to evidence that they required new learning.

Our skills scans with sixteen to eighteen-year olds [...] they've never done certain aspects of a role before, so it's very easy for us to provide evidence that they need that new learning. – *Provider*

However, while it was straightforward to assess career starters' limited prior learning, there was a higher risk of inaccuracy, or misrepresentation. The assessment process could also be less effective for career starters who wanted to impress their employer and could view the assessment as a 'test' of ability which could lead to an inaccurate result. Generally, providers believed that the assessment of prior learning yielded more accurate results for current employees, as the employer could corroborate the skills scan.

With the new hires, the behaviour skills bit is frankly a judgement call. That's quite difficult to determine, in contrast with an existing member of staff when they should know that they're [the existing employee] an appropriate person. – *Employer*

Upskillers and career changers generally had more work experience than career starters, and therefore had more prior learning to be assessed, making the process longer and more complicated. Career changers or upskillers did not always recall or realise the extent of their transferable skills and knowledge. Some providers noted that their prior learning was not always immediately obvious and could need to be distilled through multiple interactions.

Apprentices who were upskilling or changing career were likely to be older, with longer periods out of formal education. They could struggle with the initial assessment as they were generally less able to reflect on and communicate their skills, knowledge and behaviours. In cases where qualifications were achieved a considerable time ago there could also be skills deterioration. Older learners could also find the English and maths assessment daunting due to the time lapse since their last experience of education, and therefore require more support than younger learners.

They may have not engaged in this reflective piece of learning before, they might not really consider themselves as a learner and see themselves as way past being a learner. And it's about re-engagement in that, in a learner. And that's why [...] it doesn't come out straight away at the beginning, it's something that needs to be distilled over a number of different engagements. – *Provider*

It was particularly difficult to assess prior learning for career changers with significant experience in a related sector, as lines between sectors could become blurred, leading to a more opaque assessment. Providers needed to exercise discretion about how far certain skills, such as team management or customer service could be transferred into a new sector and context. More judgement was required in order to administer the assessment effectively, and then interpret it to make recommendations on whether the apprentice is fit for the programme, as well as to make decisions about the content, duration and price of the apprenticeship.

Good practice and underpinning enabling factors

Assessment of prior learning is complex, based on a high degree of provider discretion, and dependent upon a wide range of factors. The research identified the following indicators of good practice, which reportedly increased respondents' confidence in the effectiveness of the process:

- A detailed and robust assessment process that focuses on knowledge, skills, behaviours, including a skills scan;
- An assessment process that is tailored to meet the needs of individual apprentices, e.g. having a paper assessment instead of a digital assessment for those with low level digital skills;
- Specialist and skilled assessors able to communicate effectively with apprentices and employers and make informed and balanced assessments of prior learning; and,
- High-quality employer input.

These examples of good practice were underpinned by:

- Provider investment in high-quality training opportunities for assessors, to ensure that their coaching skills and knowledge of their sector were up to date; and,
- Strong partnership working between the provider and employer and joint ownership of the assessment process.

3.3 Key challenges in assessing prior learning

This section outlines challenges in assessing prior learning by examining the drivers affecting the decision making and behaviours of providers. These behavioural drivers are categorised into capabilities, opportunities and motivations. These drivers do not operate in isolation and could reinforce one another positively or negatively, to influence overall behaviour. Therefore, less robust assessment approaches tended to be used when those

involved in assessment lacked capability, opportunity, and/or motivation to assess an individual's prior learning.

The findings indicated that providers experienced several challenges in conducting effective prior learning assessments, therefore their behaviour must be understood in relation to a lack of capability. However, there was also evidence that providers may not be sufficiently motivated to conduct a robust prior learning assessment due to the financial risk of incorrectly assessing an individual's prior learning.

Capabilities

Capabilities refers to the knowledge and skills which shape decision making. In this context, a provider's capability includes their understanding of the prior learning process and how to adapt this to suit different types of apprentice, as well as the cost and time involved and their capacity to engage in the process.

Difficulty assessing apprentices

As this chapter previously reported, the outcome of the assessment depends on apprentices' articulation of their skills, knowledge and behaviour. A variety of individual characteristics such as levels of confidence, maturity, self-awareness, age and employment status influence the extent to which this representation is accurate, making it difficult to ascertain an apprentice's genuine starting point.

The biggest challenge reported by most providers was that it is hard to robustly assess apprentices' skills, knowledge *and* behaviours. Initial assessments were better at detecting apprentices' prior knowledge and qualifications, but were not as effective in assessing behaviours. A paper skills scan was not an accurate representation of how well an apprentice would do 'on the job'. Some providers stated that conducting observations once the apprentice starts their role was the only way to ensure behaviours and skills were accurately assessed. This conflicted with the requirement to assess an individual's prior learning before enrolment.

Issues with qualifications

Although qualifications were easier to assess than skills and behaviours, in some circumstances it could be challenging to capture and evidence these. Issues of note reported by some respondents included:

- Loss of certificates: apprentices could lose their certificates from previous courses and qualifications. This was particularly likely for older apprentices with qualifications from several years ago. In these cases, content needed to be repeated if providers were not able to evidence the apprentice's prior learning.

- Difficulties mapping qualifications against the standards: some employers and providers suggested that mapping existing qualifications to standards was more complicated than mapping them to frameworks. One provider explained there is no hard and fast way to cross-reference qualifications against the new standards because standards are less prescriptive than frameworks:

You've got elements that need to be there, but that's a world away from going, 'Oh, yes, I've already got that unit. I don't need to do that again.' So, because it's less prescriptive, it's harder to hang your hat on something [...] It's harder to be precise. – *Provider*

- Contested qualifications: in some cases, professional bodies disagreed about how their respective qualifications compared, leading to confusion. Some respondents also reported that apprentices come from diverse backgrounds and can therefore hold a wide range of qualifications, including international qualifications and older adult literacy qualifications. This diversity could complicate the mapping process further, increasing the number of steps required and the overall time taken to complete an assessment of prior learning.
- Outdated databases: one provider explained that they view an apprentice's personal learning record (PLR) to capture prior learning, but that this system does not always hold the most up to date information. Furthermore, the PLR record is not useable for apprentices over the age of 30.

Cost and time

Managing the assessment process required considerable time and financial investment, which can limit the scope and depth of providers' assessment processes. The initial assessment required an up-front investment of time and money in a candidate, who then may not subsequently enrol on an apprenticeship. Providers reported assessments commonly taking several hours per candidate. This was a financial loss for the provider if they were subsequently found to be ineligible:

We will do this skills scan [...] it takes about four, four and half hours [...] at the moment, we get between 25-30% of applicants are not being eligible [...] that's a lot of investment from us. We have to spend all that money and time in doing all that initial assessment, and we don't get anything for that. That really hurts. – *Provider*

Providers also faced additional practical challenges relating to the time and cost required to train their assessors to a high standard:

It's about time, it's about CPD for our trainers, it's about creating an opportunity for them to gain work experience as practitioners so they remain current within that role that they're often training. And that's all of course money. So, I think the big challenge actually, truth be told, at its core, is financial. We would look to do more, but often the everyday pressures mean now that it's a balancing act. – *Provider*

Most employers reflected that lack of time and money were two of the main factors that limited the extent of their involvement in initial assessment. Employers cannot use levy funds for the administration of apprenticeships; some therefore did not have the internal resources to invest in the process, so were not sufficiently motivated to engage.

Lack of employer expertise

Employers' lack of expertise about the prior learning assessment and contents of standards was a further factor which limited the extent to which they could engage with the assessment process. Employers that offered a range of standards in both 'core' and 'non-core' roles were less likely than employers offering one or two standards to have the specific expertise to assess apprentices against standards. Employers were not always able to challenge the provider's assessment of prior learning because they did not understand how prior learning is mapped against standards. In these circumstances, employers needed to rely on training providers to administer and manage the assessment of prior learning on their behalf:

I would have to literally sit down with every person, go through the modules with them, and then take my best guess as to whether I think it's relevant [to the standard] or not. I haven't got the time to do it or the expertise to do it. I need the training provider's expertise to be able to understand what's delivered and then understand what the person has done. – *Employer*

Motivations

Spending the levy pot

Some employers and providers noted that it was against business interests to robustly assess prior learning as it risked reducing levy spend. These employers were keen for the assessment of prior learning to be relaxed and displayed a preference for apprentices to repeat learning, rather than be ruled ineligible.

I'd much rather pay through this massive pot of money we can't spend for someone to redo something at a higher level than say to someone, 'You just can't do it' - *Employer*

Avoiding financial risk

Some providers reported that there were financial risks associated with the assessment of prior learning. If the assessment outcome suggested that an apprentice had relevant knowledge and skills, and then it transpired once the apprentice started the apprenticeship that he/she did not possess this prior learning, the provider has already spent administrative resource reducing the content and duration of the programme. Once the apprentice has started, it could be too late to adjust the cost and duration; in this case, providers needed to intensify the training for the apprentice even though they had received less funding.

Sometimes we're taking into account prior learning based on what we've been told by the employer, by the student, by our skills scan, and we're reducing our price, and we're reducing our length of programme. Then three or four months into the programme we're realising that, actually, 'there are more gaps here than we originally thought,' but by that stage it's too late to do anything about the length of programme and the price we've charged, and [...] the skills tutor really has to adapt and intensify the training. – *Provider*

Providers could also be risk averse due to a lack of clarity in the government funding and assessment guidelines, which meant that prior learning could not be accounted for in some cases⁴⁰. Some employers reported that training providers were worried about getting it wrong, so would err on the side of caution and claim that they could not prove prior learning:

[We need] that guidance, almost, from the government, essentially, of what would satisfy them as having had prior learning [...] a lot of the training providers are so worried about getting it wrong, they'll err on the side of caution and say, 'actually, we can't prove that person has got that prior knowledge.' What is seen as acceptable in the eyes of the IfATE and the DFE and ESFA? We don't know. – *Employer*

3.4 Future plans and approaches

Some providers described future plans that they anticipated would improve the effectiveness of their prior learning assessment. Plans included:

⁴⁰ The ESFA has issued [apprenticeship funding rules](#) and [guidance on initial assessment to recognise prior learning](#), although these do not provide guidance on how much providers should reduce costs by when accounting for prior learning.

- Provider-led discussions with e-platform providers to see whether there was any software available that would enable them to streamline the skills scan processes and reduce the time taken to complete a robust assessment;
- Continuing professional development (CPD) training courses for assessors and employers on standards, funding rules and quality;
- Developing the skills scan further by including a commitment statement, which would better capture apprentices' expectations and goals for the apprenticeship;
- Exploring new ways to engage employers in the skills scan, as some providers currently only involved apprentices in this process; and,
- Creating a live learner journal to complement current assessment processes, which would help to capture a truer reflection of the knowledge, skills and behaviour of an individual at an earlier stage, and more regularly throughout their time learning.

3.5 Chapter summary

Most respondents were able to identify where assessment of an apprentice's prior learning had taken place. Some apprentices and a small number of employers were not convinced that this always happened, particularly in light of limited adaptations being made to apprenticeship programmes.

There were substantial variations in the approaches taken to assessing prior learning, and the quality and robustness of these assessment processes. Some respondents described light-touch processes, which focused heavily on assessing qualifications and mapping these to the standards, with minimal emphasis on vocational behaviours and competencies. The most comprehensive approaches involved an in-depth assessment focusing on knowledge, skills and behaviours (in addition to qualifications) administered prior to selection by a specialist and skilled assessor.

Examples of good practice included the use of comprehensive assessment tools, delivery of high-quality assessor training and strong partnership working between employers and providers. Tripartite meetings between employers, providers and apprentices increased the robustness of the assessment process and ensured a shared understanding of the apprentice's knowledge, skills and behaviours relevant to the apprenticeship standard. However, respondents reported various challenges that prevented them from delivering this high-quality model of assessment. These included: assessing skills and behaviours; apprentice self-awareness, confidence and maturity in evidencing qualifications; mapping qualifications against standards; and, the time and financial investment required to undertake assessments. The extent of the employer's knowledge and understanding of the prior learning process and the content of standards could also limit the extent they were able to engage with the assessment process.

A generic process per provider for all apprentice types was the most common approach to assessing prior learning, with limited examples of adaptations for apprentice types. Career starters were generally regarded as easiest to assess due to their lack of prior learning. Career changers and upskillers could be harder to assess as they tended to have more prior learning and may not be able to reflect on or recognise their transferable skills and knowledge. These groups also tended to be older and have more prior learning. Employer collaboration was useful in checking the results of the prior learning assessment and several providers felt that employers had an important role to play in developing a more accurate assessment of existing staff.

Career changers were regarded by most providers as most difficult to assess due to the potentially extensive learning to be assessed, and an inability to corroborate this with employers.

4. Adapting apprenticeships to prior learning

This chapter focuses on the adaption of apprenticeship programmes to take account of apprentices' prior learning. It begins by exploring the extent to which apprentices and employers recognised that adaptations were made, and the impact of adaptations (or a lack thereof) on apprentice satisfaction. It then outlines the process by which apprenticeships were adapted, including negotiations between providers and employers on content, duration and cost, and the implications of adapting apprenticeships. The chapter identifies the key challenges in adapting apprenticeships to account for prior learning, relating to capabilities, opportunities and motivations. Finally, it examines how prior learning could be better recognised within the apprenticeship programme, and considers how this could benefit different groups of apprentices.

4.1 Extent that respondents recognised adaption of apprenticeships

Apprentice and employer awareness of programmes being tailored to account for prior learning

Most apprentices and employers interviewed were not aware of any adaption to their apprenticeship programmes to account for prior learning. This was particularly the case for apprentices, where, other than adaptations to English and maths⁴¹, only a small proportion of those interviewed could identify some form of adaption. Employers were more likely to be aware of adaptations, although this was only mentioned by a few employers. Most employers interviewed specifically stated that no adaptations occurred for their apprenticeship programmes. The interviews measured awareness of adaptations, and therefore it was possible that adaptations had been made without these employers or apprentices being aware of this.

Adaptions to the programme

Some providers and employers highlighted that programme adaptations were more likely in higher level apprenticeships. Where adaptations did occur, they often involved the removal of modules or units that were covered by apprentices' prior learning. Examples of reductions to the programme ranged from skipping a single unit or module to the halving of the length of an apprenticeship programme. In these instances, modules were removed either for individuals, or for a staff cohort as a whole. However, some of the apprentices who cited adaptations noted that, despite these adaptations, fairly substantial proportions of their programmes were not new to them. One apprentice explained that

⁴¹ For example, where apprentices already held English and maths qualifications at the requisite level.

this was due to her good general knowledge of many of the modules from past learning, but with the need to still learn a few 'specifics'.

Although adaptations predominantly focused on the removal of course content, one employer gave an example of additional modules being added to a programme to tailor it to the individual's needs. Several respondents also mentioned that apprentices were given the option of doing specific modules at a higher level, if they had covered them previously.

A small number of employers discussed variations in the extent to which apprenticeships were adapted. While some said that adaptation was more likely to occur at higher apprenticeship levels, others suggested that it varied by training provider.

Some providers just aren't that thorough, or they don't seem to care as much. – *Employer*

Lack of adaptations or tailoring

Most apprentices and employers interviewed explicitly indicated that they were not aware of any adaptations to their apprenticeship programmes. With the exception of English and maths, apprentices generally believed that they were following an identical programme to their peers. For many apprentices, this may have been the appropriate option. Some apprentices said that their course consisted entirely or predominantly of new material, and that with some small exceptions they had not repeated material covered within their prior learning. In some instances, their apprenticeship was clearly in a completely new topic or sector, unrelated to their prior experience or learning. In one such instance the apprentice noted that, whilst all of the sector-specific content of their apprenticeship was new material, they did have prior learning for a small proportion of the wider content; however, they felt that this was at a higher level and so was useful to cover.

In contrast, some other apprentices reported that large proportions of their apprenticeship programme repeated material for which they had prior learning. In some cases, this was simply repeating modules or content which they had covered in previous courses or programmes, or for which they had prior work experience. For other apprentices, the content of some of their programme was pitched at what they considered too basic a level.

I felt like that I was the same with a lot of things when you first start something they have [...] little introductions of learning about sort of basic things like equality and not discriminating [...] I felt a bit like, 'oh, I'm back at school.' - *Apprentice*

There were some courses where I could practically twiddle my thumbs. – *Apprentice*

At the extreme end, one apprentice stated that although they had been assessed as suitable for a level 6 programme, due to a lack of previous qualifications they were placed on a level 3 programme; hence, the entire content of the programme was at too basic a level.

To be honest, I could have skipped through the whole thing. The whole thing was so very basic. Even the writing style and things like that, it was writing 2,000 words. I write reports that can be five to ten thousand words, as part of my day to day job. So, level wise it was just unengaging. – *Apprentice*

Most apprentices who were not aware of adaptations still felt that their apprenticeship was at the right level. However, this was less likely to be the case for those who felt that they had repeated a large amount of new material, with some believing that their apprenticeship was too basic.

Perceived role of tutors in adaptation of apprenticeship programmes

Most apprentices reported that, to the best of their knowledge, their tutor did not have a role in adapting the programme to their prior learning. Despite most citing regular meetings with their tutors, this was not considered to influence the content of the programme, with the exception of arranging additional support in a small number of cases. Only a small number of the apprentices who were aware of adaptations stated that this was influenced by their tutor.

Impact on apprentice satisfaction

Although most apprentices were not aware of any adaptation, this generally did not affect their level of satisfaction with their apprenticeship. As described previously, most considered their apprenticeship to be at the right level, particularly those who were covering mostly new material.

Yes, I think it is at the right level because even when you've learnt things [previously] you still need to remember. – *Apprentice*

Where material was repeated, apprentices often felt that it was useful as a refresher or that it allowed them to cover the content from a different perspective. In contrast, for some apprentices, covering content for which they had prior learning made the apprenticeship less enjoyable. However, mostly this was considered to be slightly 'tedious' or to have had only a minor impact on their satisfaction.

[It enhanced the experience] by way of reflecting and refreshing your skills and knowledge [...] you can forget things over time if you've not done it for a while. It doesn't stay as fresh in your mind as maybe it should be when you're managing people. – *Apprentice*

The main exceptions to this were in instances where a substantial amount of the apprenticeship involved evidencing what apprentices did at work on a day-to-day basis. In these instances, apprentices perceived their apprenticeship as validating existing skills rather than building new ones, affecting their view of its quality.

It was good to be able to relate it to my job, but there was a lot of stuff that I had to do that felt a bit pointless, because it was clear that I could do it, I didn't really need to write it down that I could [...] I'm glad I didn't pay for it, let's put it that way, otherwise I'd be demanding my money back. - *Apprentice*

4.2 Process of adapting apprenticeships

The lack of awareness among both apprentices and employers of adaptations being made suggests that these occurred relatively infrequently. Most employers were not aware of any adaptations to their apprenticeship programmes. Of those who were, a small number suggested that they were always charged the maximum cost, regardless of any tailoring to content or duration. One provider highlighted that some levy paying employers wanted to pay the full cost of the course regardless of any reductions in content, in order to fully utilise their levy funds.

Where adaptations did occur, many providers described that, if candidates had prior learning which covered a specific unit or module, then this would be removed from the content of their programme.

I've got someone here that's done a plumbing apprenticeship, he's now come onto an electrical apprenticeship and some of the bits in the standard are the same, certainly the health and safety units, and some of the safe working at height practices and scaffolding. So, he's done that, and in the hour interview, that's noted and they'll APL [account for prior learning] it over into his new qualification so he won't have to do it again. – *Provider*

While the duration of some apprenticeships were shortened with the removal of modules, several providers and one employer explained that alternative modules could then be included to replace this content, or the apprentice may complete the module at a higher level.

The providers have been very good with that [adapting for prior learning] because they've actually sat with the person, talked to them, found out what their learning is, what they know, knowing full well what the core requirements of the apprenticeship is but also what the additional modules, areas they can look at, they can still tailor that to a degree to make sure that they still provide certain challenge to someone who does have a certain amount of experience - *Employer*

One provider highlighted the importance of using their first workplace visit to check that the removal of content was appropriate. Others talked about tailoring all programmes to individual apprentices through a generic delivery model, adapted for each learner. This might involve taking account of an apprentice's individual learning style and areas for development; creating a bespoke learner plan based on the assessment of prior learning and programme content, or a combination of skipping some modules whilst incorporating a mixture of alternative and higher level modules, as in case study 4 (see page 46). One provider emphasised that all of their learners had personalised, tailored learning plans.

I think the individual learning plan is very much personalised to the learner and I'd say all of our programmes are tailored to suit that learner and focus more heavily on areas that they have skill gaps and less so on areas where they have prior experience on. I would say all of our learners have a personalised programme. – *Provider*

Another provider mentioned six weekly learning reviews between the provider, employer and apprentice to establish if any changes or adaptations to content were needed. Distinct from this more structured approach, a small number of providers described more informal adaptations, such as enhancing the content to ensure it stretched all apprentices or discussing with the employer and apprentice how it should be tailored.

Provider and employer negotiation process

Responses from providers highlight some variation in how adaptations to apprenticeship programmes were negotiated. Often, different teams were involved in the process, with the curriculum team covering the assessment of prior learning and identifying adaptations, and the business development or sales team assessing costs and leading the negotiation with employers. This separation of functions into different teams may have hindered the ability for cost and adaptations to be considered together during the negotiation process, particularly where business development meetings occurred before the assessment of prior learning.

Several providers stated that final decisions were taken in negotiation with employers, with discussions covering the evidence of prior learning, course content and cost.

This tailoring/differentiation was and always is negotiated with the employer - the elements of training that they have to deliver as part of the standard are always delivered, but the rest of the content is planned with the employer in advance based on their needs and what apprentices will need to know in [the] workplace. – *Provider*

However, other providers described the process as less of a negotiation, and more of a proposal that the employer then agreed to.

It's normally a proposal. We would take into account what prior learning the learner has and then we would go back with the proposal to the employer to say, 'We recognise this learner has completed X prior to that and therefore our proposal is this', but I can't think of any times where it's got into what I would call a formal negotiation of, 'No I'm not happy with that, we need to adjust'. – *Provider*

Case study 6 below (see page 65), describes an employer working closely with an ITP to reduce the cost of an apprenticeship where prior learning was identified. In this instance, the assessment of prior learning process clearly linked to the units and modules undertaken, and the agreed cost and duration of the apprenticeship. The key reasons for this were the robust assessment of prior learning undertaken by the training provider and the proactive employer involvement in the process, which was driven by their commitment to ensuring apprenticeship programmes were meaningful development opportunities for their existing employees.

Case study 6: Adaptions for prior learning⁴²

Good Biz is a large charity trust with over 850 employees, including approximately 100 apprentices. The company offers apprenticeships in a range of areas, such as health and social care, accounting and project management. It currently offers level 3 to level 5 apprenticeships but plans to offer degree apprenticeships in the future. Good Biz pays just under £100,000 into the levy and used this to upskill their staff, with no plans to recruit new staff as apprentices. They have rapidly expanded the range of apprenticeships on offer, but are not able to offer apprenticeships for some roles where standards do not yet exist.

Good Biz works with a range of providers, including Training Fix. Training Fix is a large independent training provider, which offers apprenticeships from level 2 to level 5 in several sectors. Assessment of prior learning starts when candidates book their enrolment date with Training Fix, who ask them about their existing skills and experience. Good Biz provide a log of all training completed by each candidate, sometimes including training completed prior to joining Good Biz. At enrolment, candidates complete a 'distance travelled' questionnaire which contains several statements mapped to the apprenticeship standard. Candidates score themselves from 1 to 10 in the corresponding knowledge, behaviour and skills; this may be followed by an in-depth discussion with the tutor, to ensure accurate self-assessment. Candidates also provide qualification certificates and sit an English and maths assessment.

When first speaking to providers, Good Biz communicates that they are interested in reducing cost where prior learning can be accounted for. Therefore, if prior learning is identified, apprentices will skip the corresponding units or modules. This adaption can reduce the cost and duration of an apprenticeship and also improve apprentices' motivation by showing that their prior learning is valued. Such adaptions for prior learning happen 'more often than not' for Good Biz's apprentices.

[Accounting for prior learning] tended to have a good impact against the teaching assistant cohort [...] it certainly motivated the group to know that the employer was open to learning that had happened before. – *Good Biz*

The key success factors of the apprenticeship were:

- Flexibility of the relevant apprenticeship standards, enabling adaption where appropriate.
- Pro-active approach of the employer in seeking cost and time reductions where prior learning exists.

Implications of adapting apprenticeships

Identification of prior learning leading to adaptations to apprenticeship programmes typically result in an overall reduction in programme content, often with a corresponding reduction in course duration. The most common implication of this, identified by employers and providers, was the associated reduction in the cost of the programme.

I think the funding would go down [...] if an apprenticeship funding cap is £9,000 but they've done 20 per cent of it or whatever, that would be reduced in the funding. – *Provider*

However, accounting for prior learning did not always reduce overall content, as additional material was sometimes included as a replacement; therefore, there was not always a reduction in cost. Examples of additional material added by providers included Continuing Professional Development (CPD) learning activities, one-to-one learning support, or different practical activities at higher or lower levels for individual apprentices.

A small number of providers stated that the 12-month minimum duration meant that, once adaptations for prior learning were taken into account, some individuals were ineligible for apprenticeships⁴³. This was particularly a problem for level two apprenticeships. It was noted this may have reduced employers' ability to spend all of their levy, as they may not have been able to identify sufficient eligible candidates for apprenticeships.

One employer explicitly linked 20% off-the-job training to adaptations for prior learning, stating that reducing the duration and price of apprenticeship programmes could be beneficial for employers by reducing both the cost of training an apprentice and by reducing the overall time they are required to spend off-the-job.

It would help me [if duration was reduced], because they would get through the apprenticeship training more quickly and therefore the 20 per cent wouldn't last as long as it does. – *Employer*

⁴² This case study was developed from 'matched' interviews with a levy paying employer and one of the training providers they work with.

⁴³ The providers did not state what happened once individuals prior learning meant they were ineligible for an apprenticeship, for example whether the individual did not do an apprenticeship, were put onto another apprenticeship, or if more content was added to an apprenticeship programme to meet the 12-month requirements.

4.3 Key barriers to adapting apprenticeships to account for prior learning

Providers and employers cited a range of challenges in adapting apprenticeship programmes to take account of prior learning. As in previous chapters, these are explored below in relation to capabilities, opportunities and motivations.

Motivations

Some employers and most providers recognised the financial implications of adapting apprenticeships as a key challenge for providers, citing several different aspects to this, including the cost of the assessment and adaption process, the staffing and time cost of individually tailoring courses and the lowering in price from reducing the apprenticeship content.

Firstly, some employers and providers noted that the assessment period did not generate revenue for providers, and so there was an incentive for providers to start individuals on their apprenticeships as soon as possible. The risk of finding a candidate ineligible for an apprenticeship due to prior learning was also reported by some providers and employers as a disincentive for providers to conduct a robust prior learning assessment.

Secondly, several providers highlighted the resource intensive and expensive nature of providing individually-tailored courses. Some providers noted that minimum numbers of students were required for any classroom learning for it to be cost-effective; if too many apprentices skipped a classroom-based module, there may not be enough income to cover the cost of the tutor. These factors could impact on the financial viability of an apprenticeship programme for providers.

What it's done [accounting for prior learning] is mak[ing] cohort delivery impossible. The way [we] delivered groups, before, you can't do that, because I can guarantee you, if you've got a group of ten people [...] each one will go through that skills scan [and] come out with different sessions required [...]. It's massively driven up the cost for us, and in some cases the employer, because they're used to having groups of people together [...] and we're now having to explain to [an] employer that cohort delivery will not work, because student A needs this, student B needs that. – *Provider*

Thirdly, some providers and employers highlighted that a lowering of the price of the programme following reductions in course content was a disincentive for adapting apprenticeships. A small number of employers believed that adaption may have affected the financial sustainability of training providers, with one noting that two providers they worked with had gone into administration. One employer reported that providers were

risk averse and may have erred on the side of caution when reducing programme cost, in case they had wrongly assessed prior learning and hence underestimated costs. The reduction in cost was also highlighted as a possible disincentive for levy paying employers, who may have wanted better value for money but not necessarily at reduced cost because they wanted to spend their levy.

It's a double edged sword [...] because my HR director [...] has been saying to me, 'They're all going in at the top end [...]. How can we negotiate? Can we get things built into the programme in addition if we're paying the full whack for it?' But, then conversely, we've got this huge pot of money that we're not spending. So, we come full circle to, actually if the pot's there to be spent [...] anything we don't spend we lose anyway. Perhaps training providers are thinking that's what employers will think and they'd be absolutely right, that is how employers are thinking. – *Employer*

Aside from financial implications, employers may not have wished for apprentices to skip parts of the programme to ensure consistency across the cohort. For example, one employer stated that although individuals may have learnt something previously, they may not have learnt it 'the company way'. In addition, some employers wished for all their apprentices to undertake the programme as a cohort. One provider gave a similar view, considering themselves likely to lose employers if they insisted on apprentices undertaking a higher level apprenticeship due to prior learning than the level desired by the employer. This suggests that employer and provider behaviour may have limited the level of apprenticeship individuals accessed.

A lot of employers have been requesting level three but now that we're starting to look more in depth at their prior learning we can justify turning around and saying to them, 'Well actually this person has been in this role for X amount of time. They have this experience, so we've got a skill scan that shows that. We think they should be doing a higher level than what you've requested.' So, I think we'll see more higher levels within property. This process may work in our favour [...] but potentially we could also lose customers from us saying this is not the right level and the employer not wanting to go to the higher level. It's still early days. – *Provider*

Capabilities

Some respondents reported specific challenges related to apprenticeship programme requirements. For example, several providers and employers believed that the 12-month minimum length of an apprenticeship impacts on the extent to which adaptations can take

place for individuals enrolled on shorter programmes (i.e. those where the original duration was close to 12 months). Where a substantial amount of prior learning exists, it may not be possible to adequately reduce the content without falling below the minimum duration. Similarly, several employers reported concerns that individuals with substantial levels of prior learning may not have been accepted onto an apprenticeship, as they would not have met the eligibility criteria if too many modules were removed. One provider highlighted that the 20 per cent off-the-job training requirement prevented programme adaptation where apprentices mainly needed workplace training; for example, if candidates had completed relevant formal training courses but still required on-the-job training.

...[it's a] disadvantage to young people who've come to college full-time and have learnt an element of that job and then, when they go into the workplace, there's a problem with getting the 20% off-the-job training, in terms of the formal college stuff because they've already had it. And, in some cases, we've actually had to turn down young people who are elementally suitable for that apprenticeship on the basis that, 'Sorry, we can no longer do significant training external to the workplace because of what you've already learnt. You cannot be an apprentice with that prior knowledge.' And I think that's really, really unfair on those young people. – *Provider*

There were mixed views on the flexibility of apprenticeships in adapting to prior learning. Although many employers believed that apprenticeships were highly flexible, they often related this to the tailoring of course content to business needs, rather than prior learning. Several employers said that programme content was not flexible enough to do this. For example, one employer was told by the training provider that repeating material related to Prevent and safeguarding was a requirement.

When I said to my account manager [...] 'People don't think this is relevant to them, they've done it or they know it', and [the provider] said, 'Oh sorry, we've got to do that [i.e. Prevent or safeguarding], because it's a government requirement that is included in all apprenticeships.' – *Employer*

Providers and employers highlighted several challenges related to the practicalities of adapting or tailoring programmes. For example, several respondents reported that it could be difficult to tailor the content of classroom-based learning to individual apprentices' prior learning. One provider felt that adapting for prior learning prevented them from delivering apprenticeships in cohorts, as content was too bespoke; this required them to include more one-to-one and distance learning, as they were less able to deliver content to a group. There may also have been difficulty in adapting

apprenticeships whilst accommodating employers' requirements for day release or block release programmes, as some individuals in a cohort may have had prior learning for material covered in the block.

There were mixed views amongst providers as to whether the introduction of standards had made the adaption of apprenticeships easier. Several providers felt that standards were more flexible than frameworks, and hence easier to adapt to account for prior learning. However, one provider strongly disagreed and stated that tailoring a programme had been easier on frameworks due to the large number of optional units available which made it easier to pick and choose suitable units when accounting for prior learning.

There were literally 100's of 100's of optional units [under frameworks] [...]. There's no way anyone could be competent at all of those units. From an initial assessment point of view, what you would do is quite easy. You would just be choosing units that the student didn't know about, [...] but the standard bit is a lot more streamlined in its approach, in that everybody is working to the same end-point assessment. – *Provider*

Opportunities

A small number of employers reported that the extent of providers' adaption varied both between providers and at different levels. Specifically, they reported that providers were not as thorough in adapting apprenticeships at lower levels than they were at higher levels. Employers explained that this limited their opportunity to influence adaptations and negotiate on price. One employer who was keen to ensure their apprenticeships accounted for prior learning recalled that their training provider was unwilling to either negotiate on price or map prior learning to the programme content.

Supposedly you get to work with one training provider [...] the price that they pay is the top price but you can negotiate down, all that's been rubbish. We've not been able to negotiate anything [...] I said 'many of them may have done their level 2 six or seven years ago [...] plus their additional days of training, other food hygiene training [...] we need to get those mapped across'. I've told managers [...] 'make sure you speak to the training provider and say to them that you want to see what's been mapped over first. So, then you can reduce the price because they won't have to do those units anymore'. They're [providers] not having any of it. – *Employer*

Although no respondents cited the separation of content and price negotiation as a challenge in the adaption of apprenticeships, several providers mentioned that this separation occurs. In these instances, employers did not have much input into decisions

about adaptations of content and price. This implies that some employers may not have the opportunity to insist on adaptation for prior learning.

4.4 How prior learning could be better recognised

Respondents have a range of suggestions as to how prior learning could be better recognised within the apprenticeship programme. In the main these related to guidance, with many providers and some employers suggesting that further information is required as to how prior learning should be assessed and programmes adapted. There was a sense amongst some respondents that assessing prior learning is currently a subjective process, and that guidance is needed for it to be completed correctly and consistently⁴⁴. One provider highlighted that designing an individual assessment process could be resource-intensive, particularly for ITPs due to a lack of subject specialist staff, and asserted that guidance could reduce this burden.

I think there could be more advice and guidance. You have to be a master of many different areas in this field [...] because we are often creating things from scratch. And really deeply thinking about 'how do we capture [prior learning]' [...] really profiling the learner [...] that's quite costly. – *Provider*

One provider felt that the government should provide this guidance rather than leave providers to decide for themselves⁴⁵.

When you go through the guidance documents, off-the-job training, the government says, 'we're not going to tell you how to record off-the-job training, we're going to let you use your skills to decide that'. Basically, they [Government] haven't got a clue because they can't give prescribed guidance. And it's the same for this prior learning. 'We're not going to tell you how to assess it [...] we're going to leave that to you to sort out'. [...] they know it's a mess and they're leaving it to us to try and fix that mess for them. – *Provider*

⁴⁴ [Guidance on initial assessment to recognise prior learning](#) was published in March 2019.

⁴⁵ The ESFA has issued [apprenticeship funding rules](#) and [guidance on initial assessment to recognise prior learning](#), detailing the initial assessment process, the responsibilities of the provider and what constitutes prior learning. The DfE believes that providers are best placed to work with employers to decide what training should be delivered, how much that costs, how delivery should be recorded, and how costs can be reduced if it is not necessary to deliver the full programme, while also considering wider business factors, such as fixed and variable costs.

Specific areas where respondents noted that guidance would be useful included:

- Robust guidelines or standardised templates to help training providers assess prior learning;
- Information on how to link prior learning to the duration of the programme;
- Guidance on reducing the cost of programmes based on adaptations for prior learning and on how to negotiate this with employers – including the extent to which employers' business interests could overrule judgements about eligibility and content; and,
- Specific guidance on how to assess behaviours.

A small number of providers mentioned specific issues relating to the assessment of English and maths. One provider argued that there should be less of a focus on English and maths assessment when assessing prior learning; focusing predominantly on technical skills and knowledge instead would indicate to apprentices that their prior experience is valued. A second provider suggested that English and maths assessments made the programme less accessible for older learners, who may struggle to prove English and maths proficiency.

A small number of respondents suggested changes related to funding of apprenticeships. For example, an increase in apprenticeship funding overall (such as increasing the maximum rate for standards) could prevent reductions in cost as a consequence of adapting for prior learning, from affecting the financial viability of apprenticeship programmes. Specific funding for the assessment of prior learning process was also suggested, with an employer noting that currently providers do not generate revenue during this period.

The way the funding is currently working is this piece for apprenticeship delivery, there is a piece of funding for end point assessment, perhaps there could be a piece of funding assigned to prior learning. – *Employer*

Providers and employers suggested that these changes to improve the assessment of prior learning would impact apprentices differently depending on the extent of their prior learning.

Overall, career starters were regarded as easiest to assess as they tended to have the least amount of prior learning, and the least need for adaptations to apprenticeship cost, content and/or duration. Therefore, most respondents, including career starter apprentices, reported that the existing prior learning processes were sufficient for this group. Some providers suggested removing the need for a full assessment of knowledge, skills and behaviours for this group as there was a risk that some career starters could be

ruled ineligible from desk-based prior learning, and less stringent processes would ensure that career starters could access apprenticeships to learn skills in a work-based context.

There were several reported benefits for improved guidance to the prior learning assessment process for apprentices categorised as upskillers. Some respondents noted that upskillers were disadvantaged by the current implementation of the prior learning assessment process; either because it was not robustly undertaken and therefore the apprenticeship repeated elements they already knew, or because they risked being ruled ineligible due to an over-reliance on qualifications in the prior learning assessment, rather than what they were able to do day-to-day. Some respondents believed that suggested changes to clarify the assessment process would reduce these risks, which arose mainly from a lack of provider understanding and inconsistent assessment.

Some respondents reported that clearer information about how to assess prior learning and amend the duration of the programme could enable upskillers to access shorter apprenticeship programmes, while still meeting the minimum 12 month duration. The key benefit of a reduced apprenticeship duration was the reduction in the time required to undertake 20% off-the-job training, which was a significant challenge for some employers and apprentices with existing workloads to undertake.

Respondents also highlighted some benefits of improving the robustness of prior learning processes and the subsequent adaptations to apprenticeships for career changers. Most providers reported difficulties with the assessment of transferable skills, and subsequent adaptation of apprenticeships for career starters. Improved assessment guidance could support providers to understand the transferable skillset of career changers. However, respondents had mixed feelings about the extent to which apprenticeship programmes could be tailored to account for transferable skills. Some providers suggested that the apprenticeship standards required subject specific knowledge and skills requirements, therefore those without relevant knowledge and skills would have to access the full apprenticeship, usually at entry level, to achieve the set standard.

4.5 Chapter summary

Most apprentices and employers were not aware of any adaptations to their apprenticeship programmes. Where adaptations were reported, they often involved the removal of modules or units, although some apprentices reported the opportunity to choose their modules or cover specific modules at a higher level. Where adaptations did not occur, apprentices were split between those for whom their course is predominantly or wholly new material and those who repeated large proportions of the content. Although most apprentices were not aware of any adaptation to their apprenticeship, this did not in general affect their level of satisfaction with their apprenticeship. Most apprentices who

repeated material found it either a useful refresher or just slightly tedious, unless the apprenticeship exactly replicated their usual work in a more basic form.

There was often a split between the assessment of prior learning and identification of adaptations, conducted by curriculum teams, and the subsequent negotiation with employers about cost, which was usually covered by the business development or sales team. This separation could make the processes unrelated in practice, which limited the usefulness of prior learning assessments.

Several challenges in the adaptation of apprenticeships centred on programme requirements, such as the 12-month minimum duration or requirement for at least 20 per cent off-the-job training. Others related to practicalities, such as issues with classroom-based learning or apprentice cohorts. The most common challenge was the financial disincentive for reducing programme content, both for providers and for employers who wished to spend as much of their levy as possible. Some employers also wanted their apprentices to undergo consistent training or learn material in 'the company way'. This highlights a tension between a more individualised and person-centred approach to adapting apprenticeship programmes around individual prior learning, and the organisational needs of providers and employers.

Respondents gave a range of suggestions as to how prior learning could be better recognised. These suggestions mainly related to the provision of guidance, as many providers and some employers suggested that further information is required as to how prior learning should be assessed and programmes adapted. A small number of providers also mentioned funding-related changes, such as specific funding for the assessment process. These changes could provide most benefits for upskillers as the lack of clarity around the assessment and adaptation process was a key factor behind inconsistent adaptations to apprenticeships in relation to individual's relevant prior learning. In contrast, career starters often did not require adaptations to apprenticeship provision, and career changers without relevant prior learning were likely to have to undertake the full apprenticeship programme to pass the standard.

5. Conclusion

This research provides an evidence base on the behaviour of levy paying employers in the context of substantial recent reforms to the apprenticeship system. These reforms, including the introduction of the apprenticeship levy and the transition from frameworks to standards, were introduced to make the apprenticeship system more employer-led and increase the quality and employment outcomes from undertaking an apprenticeship. The findings suggest these changes have led to significant shifts in employer behaviour regarding apprenticeship use, and to the profile of apprentices.

The research aimed to understand levy paying employer behaviour in spending their levy, and the drivers of this behaviour, as well as how prior learning is assessed and accounted for and whether prior learning could be better recognised. Also, this research explored the implications of employer decision making on different apprentice typologies: career starters, upskillers, and career changers.

In combination with other evidence⁴⁶, the research findings indicate that employers were largely focusing their levy to upskill existing staff, rather than recruiting younger career starters or focusing on people seeking to change their career. The research also confirmed a general preference amongst employers towards apprenticeships at higher levels, which was largely driven by their decision to utilise the apprenticeship levy to upskill their staff. Employers with established histories of apprenticeship provision tended to have a more diverse apprenticeship offer than employers who developed their offer primarily in response to the introduction of the levy.

Employers' decision making was highly influenced by financial considerations. The apprenticeship levy was often regarded as the 'first port of call' for training and recouping the full levy spend was a recognisable objective among employers, achieved through means such as high cost apprenticeships or mass enrolment. The research found several examples of the levy directly replacing training that employers previously offered.

The suitability of apprenticeship programmes for each organisation varied and there were several examples where the apprenticeship offer was not suitable to meet staff and business need. Key factors that had an impact on suitability included the length of the programme, the requirement for at least 20% off-the-job training and the inclusion of functional skills assessments. In some cases, employers felt unable to use their levy to

⁴⁶ This evidence chiefly refers to the DfE apprenticeship start data, as well as the research studies and evaluations cited in the report.

[Monthly apprenticeship starts by sector subject area, framework or standard, age, level, funding type and degree apprenticeship](#): April 2019.

invest in staff development, or support recruitment due to the constraints of the programme.

Employer knowledge and understanding of apprenticeships was reportedly increasing and most employers interviewed expected to continue to use the levy to upskill existing staff and offer more apprenticeships at higher levels as standards become available. While some employers planned to use the levy to support recruitment of career starters in the future, this was occurring at a slower rate due to financial constraints and organisational capacity.

The research found substantial variation in the approaches used for assessment of prior learning, and in the quality and robustness of these approaches. Some respondents described light-touch processes, which focus heavily on assessing qualifications and mapping these to the standards, with minimal emphasis on vocational behaviours and competencies.

The most comprehensive approaches involved an in-depth assessment that focused on skills and behaviours (in addition to qualifications) and high-quality employer involvement, administered prior to selection by a specialist and skilled assessor. Examples of good practice were underpinned by several enablers such as a comprehensive assessment tool, high quality assessor training and strong partnership working between employers and providers. However, respondents reported various challenges that prevented them from delivering this high-quality model of assessment as standard practice including: accurately assessing skills and behaviours; apprentice self-awareness, confidence and maturity; evidencing qualifications; mapping qualifications against standards; time and financial investment required to undertake assessments; and, employers' knowledge and understanding of the assessment process and the capabilities of apprentices. Overall, most providers stated that a prior learning assessment could not provide a wholly accurate representation of behaviours and skills. They reported that a full assessment of behaviours and skills required an observation once an apprentice had started their role, which conflicted with the rule that a potential apprentice's prior learning must be assessed before enrolment.

Some types of apprentice, such as career starters, were regarded as easier to assess, whilst career changers and upskillers could be more challenging. Although there were some limited examples of amendments to the assessment process being made for certain apprentice types, this was not standard practice. A generic process for all apprentice types was most common.

The majority of apprentices and employers interviewed as part of this study were not aware of any adaptations to their apprenticeship programmes. Where adaptations were reported, they often involved the removal of modules or units, although some apprentices reported the opportunity to choose their modules or cover specific modules at a higher

level. Where adaptations did not occur, apprentices were evenly split between those for whom their course was predominantly or wholly new material and those who repeated moderate to substantial proportions of the content. Although most apprentices were not aware of any adaptation to their apprenticeship, this did not in general affect their level of satisfaction with their apprenticeship, unless the programme was heavily focused on the validation of day to day skills used in their role at a very basic level.

Within providers there was often a split between the assessment of prior learning and identification of adaptations, covered by the curriculum team, and the negotiation with employers, covered by the business development or sales team. Although some providers stated that final decisions on content and cost were taken in negotiation with employers, others considered it as a proposal to be accepted by employers.

A wide range of challenges in the adaptation of apprenticeships for prior learning were identified. Several of these centred on programme requirements, such as the 12-month minimum duration or requirement for at least 20 per cent off-the-job training. Others related to practicalities, such as issues with classroom-based learning or ensuring viable apprentice cohorts. Providers also reported that there was a lack of guidance about how much the apprenticeship cost should be reduced in relation to an apprentice's identified prior learning. The most common challenge was the financial disincentive for reducing programme content. This disincentive was recognisable both for providers and for employers who wished to spend as much of their levy as possible, particularly if employers perceived that their levy exceeded the amount required for their training or recruitment needs. Some employers also wanted all of their apprentices to undergo consistent training, or to learn material in 'the company way', so were resistant to individual apprenticeship adaptations. This raises a tension between a more learner-centred approach to apprenticeship provision (adapting the programme of learning around the needs of the individual apprentice) being advocated by Government, and the wants and/or perceived needs of providers and employers.

Respondents gave a range of suggestions as to how prior learning could be better recognised within the apprenticeship programme. In the main these related to guidance, with a large number of providers and some employers suggesting that further information was required as to how prior learning should be assessed and programmes adapted. A small number of providers also mentioned funding-related changes, such as specific funding for the assessment process.

There were several benefits identified for improving the assessment of prior learning for apprentices, employers and providers. One key benefit to employers was the potential for a reduced duration and price of apprenticeship programmes, which subsequently would lower the cost of training an apprentice and the overall time they were required to spend off-the-job. Respondents highlighted that suggested changes to improve the consistency of the prior learning assessment and adaptation processes would be likely to benefit

upskillers with relevant prior learning who may be incorrectly ruled ineligible or not be accessing the right level of apprenticeship for their needs. In contrast, some respondents reported that career starters often did not require adaptations to apprenticeship provision so may not benefit as much as upskillers from improved prior learning assessment processes. The implications of more robust prior learning assessment and adaptations for career changers were mixed. Some providers felt that it would be beneficial to have guidance about how transferable skills should be assessed. However, some providers and employers reported that limited adaptations could be made as career changers without relevant prior learning were often required to undertake the full apprenticeship programme to gain the relevant technical knowledge and skills to pass the standard, regardless of their transferable skillset.

5.1 Areas for further consideration

The evidence gathered for this research and data on apprenticeship starts⁴⁷ indicate distinct trends in the ways in which employers are using their levy, including: high proportions of apprentices aged 25 and above, who were predominantly existing staff seeking to upskill; and, growth in apprenticeships at level 4 and above. In formulating an appropriate policy response, the DfE might first consider the extent to which these outcomes align with government's aims for the apprenticeship programme and intentions behind the apprenticeship levy. The findings suggest that the programme is currently more successful at upskilling the existing workforce than supporting young people's transition to the labour market, for example. Greater clarity on what and who apprenticeships are for will enable assessment of what action should be taken, in light of the evidence presented in this report on employer decision making.

The research findings highlighted two key issues that affect the extent to which prior learning is assessed consistently and robustly: the financial viability for providers to carry out pre-programme assessments for which they receive no funding – and no financial benefit if an individual is found to be ineligible; and, that it may not be in providers' and employers' interests to make adaptations that could lower the price because employers are motivated to use up their levy pot and providers want to maximise income. The DfE could consider how it can incentivise providers and employers to ensure that assessment of prior learning is carried out properly, for example by making funding available for this. In addition, or alternatively, the department could consider how to improve compliance with funding rules, for example through more visible audit of proof of assessment and adjustments from the ESFA.

⁴⁷ [Monthly apprenticeship starts by sector subject area, framework or standard, age, level, funding type and degree apprenticeship](#): April 2019.

Feedback from employers and providers suggested that some requirements of an apprenticeship make it an inappropriate or unattractive programme for some individuals or sectors. For example, some respondents said that 20% off-the-job training is difficult to manage with particular occupations, such as teaching, and employers in the care sector reported that the English and maths elements of an apprenticeship are off-putting to their staff. Several providers explained that they had found some potential apprentices ineligible for a 12-month programme, or that off-the-job training was not needed, following assessment of prior learning. The concern raised in relation to these issues indicated a potential lack of consideration of alternative provision by training providers, which was likely to be driven by financial incentives (for both employers and providers) to make training match the apprenticeship model if at all possible. In developing future policy, the DfE might consider ways in which providers and employers could be incentivised to offer alternative learning and development, where an apprenticeship is not the most suitable option, including how this could be financed. In particular, this could support training for upskillers and career changers, who are most likely to have prior learning.

Suggestions from employers and providers for the improvement of assessment itself mainly related to the provision of clear and accessible guidance from government:

- Robust guidelines or standardised templates to help training providers assess prior learning, including materials to assess behaviours.
- Information on how to link prior learning to the duration of the programme.
- Guidance on reducing the cost of programmes based on adaptations for prior learning and on how to negotiate this with employers – including the extent to which employers' business interests could overrule judgements about content.
- Training for practitioners conducting assessments.

Appendix 1: Research sample

This research used purposeful sampling to identify and engage with a range of employers, providers and apprentices. This involved using the Individualised Learner Record (ILR). ILR data was taken from September 2017 onwards to provide a focus on activity following the introduction of the apprenticeship levy and ensure research participants have accurate recall of recent decision making and practice. The sample quota achieved is set out below:

Employer interviews

Total	Technical education routes	English regions	Levels available			Apprenticeships offered	
			Level 2	Level 3	Level 4+	Standards only	Standards and frameworks
30	13/15	8/9	11	20	18	17	13

Provider interviews

Total	Technical education routes	English regions	Levels available			Provider type		
			Level 2	Level 3	Level 4+	Further Education	Independent Training Provider	Higher Education Institution
30	12/15	9/9	21	25	16	12	10	3

Apprentice interviews

Total	Technical education routes	Levels			Employment status		Age	
		Level 2	Level 3	Level 4+	New recruit	Existing staff	Under 25	25 and over
25	12/15	6	13	6	9	16	11	14

Matched interviews

Case study	Matched interviews achieved
1	Employer and provider
2	Apprentice and employer
3	Apprentice and employer
4	Apprentice and employer-provider
5	Apprentice and provider
6	Employer and provider

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Department
for Education

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Reference: DFE-RR1005

ISBN: 978-1-83870-192-5

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