

Public sector apprenticeship targets

Response of the Association of School and College Leaders

- 1 The Association of School and College Leaders (ASCL) represents more than 18,500 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
- 2 ASCL is supportive of the government's intention to increase the number of apprentices. But there are a great many concerns about these proposals, which present as poorly thought-out and likely to have many unintended consequences.

Apprenticeship levy

- 3 This levy is unpopular with employers in the private sector and will be no less so in the public sector. Especially at a time when the funding of the public sector is under such severe pressure it does not seem reasonable to apply this levy, which will effectively recirculate public funds from one heading to another at the cost of a great deal of bureaucracy.
- 4 As the levy will apply to any body with a pay bill above £3M, it will catch the great majority of secondary schools and colleges of all kinds. As education is a labour-intensive service industry 0.5% of the pay bill will translate to a cut of approximately 0.4% of total funding. This may not seem like a large figure, but it comes on top of several other such cuts, and in the context of headline funding at best frozen. It is not clear that this further cut is expected by education leaders and factored into future projections of school and college finances, many of which are already fragile.
- 5 Transparency will be required to accurately determine which body is classed as the employer for both the £3M threshold and the £15k allowance. Who is the employer is not always clear in education.
- 6 If an employer has multiple payrolls the employer can still only claim the £15000 allowance once per annum. In the case of a local authority (LA) this will often be the case as many schools manage and run their own payroll. How will maintained schools access the allowance? A maintained school should be able to access the allowance if

it is obliged to pay the levy, even if the employer is nominally the LA. The same issue will arise in the context of some multi-academy trusts (MATs).

- 7 There needs to be more clarity on how the levy and allowance will work in practice. There will be a costly administrative burden if all employers have to account for the levy and the allowance in real time (as is required with other PAYE elements), or merely to demonstrate that their annual payroll costs fall below the £3m floor.

Apprenticeships targets

- 8 The bodies in scope to have apprenticeship targets set specifically include all publicly funded schools including council schools and academies (though not incorporated colleges, which are deemed not to be in the public sector). There is a threshold of 250 employees, but many secondary schools will exceed that, and MATs, academy chains and the like will certainly do so. Further, there is scope for smaller bodies to be included 'en bloc', though it very hard to see how that could work.
- 9 And as above there may be uncertainty over who is the employer in the case of community schools, if this is deemed to be the LA it will certainly be well above the threshold. Though a local authority may find it somewhat easier to meet such a target as it has employees of many different kinds, it will be severely hampered if its nominal headcount includes all employees in maintained schools.
- 10 The overall target for apprenticeship starts per year is apparently to be 2.3% of the employee headcount regardless of the type of public sector body. So a school with 250 employees would need to start 6 apprentices per year, and these are supposed to be proper jobs, so there must be 6 vacancies per year. That is hardly credible; many of the vacancies that occur in schools are for graduate teachers or more senior staff and are not suitable for apprenticeships. And in some areas and institutions staff turnover is in any case very low.
- 11 There is some appetite in schools and colleges for taking on apprentices, particularly in administrative functions where this meets operational need. But the target of 2.3% is not likely to be achieved in the educational context.
- 12 Further, 250 is a very low threshold implying a relatively small target per year (6), such a figure is likely – even in a context where it will sometimes be met, to vary wildly from year to year. At the very least the headcount floor should be raised to a level where staff turnover will make the target more realistic – this potential will be increased where the geographical spread of employee catchment is much wider than most schools and smaller MATs have access too.
- 13 The imposition of a levy that may in some small way be recouped by training grants available for employers who take on an apprentice is already a big enough stick to be beating schools and colleges with; they do not need the additional pressure of an unsustainable target for apprenticeships per workforce.
- 14 Safeguarding may be an issue if there is pressure to achieve the target in an environment where age appropriate apprenticeships are limited.
- 15 How has the figure of 2.3% been arrived at? It appears in this document as entirely arbitrary, though no doubt some thought has been given to arrive at it. The most

significant aspect of it though, which implies a very low level of planning, is that it is proposed as a single figure for all parts of the public sector. It will inevitably fail as an effective target as being very easy for some organisations to meet and impossible for others. This is not a sensible way to set targets.

- 16 The very short deadline allowed for this consultation is also unreasonable, betokening undue haste and poor planning, especially as the relevant bill has not yet passed through Parliament.

- 17 I hope that this is of value to your consultation, ASCL is willing to be further consulted and to assist in any way that it can.

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Association of School and College Leaders
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