



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Apprenticeships Levy Consultation
BIS
Spur 2, Level 2
1 Victoria Street
London
SW1H 0ET

By e-mail

2 October 2015

James Caird
Consultant Consultations Co-ordinator
IHBC Business Office
Jubilee House
High Street
Tisbury
Wiltshire
SP3 6HA

Tel (01584) 876141

Web site www.ihbc.org.uk

E-mail consultations@ihbc.org.uk

Dear Sirs

APPRENTICESHIP LEVY

The Institute of Historic Building Conservation (IHBC) is the professional body for building conservation practitioners and historic environment experts working in England, Northern Ireland, Scotland and Wales, with connections to the Republic of Ireland. The Institute exists to establish, develop and maintain the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation. We are sorry that we were unable to make the consultation form operate correctly. We have copied the content and answer the questions below:

What is your name?

James Caird

What is your e-mail address?

consultations@ihbc.org.uk

What is your job title?

Consultations co-ordinator.

I am responding on behalf of an organisation.

What is the name of your organisation?

The Institute of Historic Building Conservation which is a professional body.

Where are you based?

UK wide.

Paying the levy

1. Should a proportion of the apprenticeship funding raised from larger companies be used to support apprenticeship training by smaller companies that have not paid the levy?

Yes. It is smaller companies that are hardest pressed to contribute to training in their sector whether apprenticeships or not.

2. Do you have any comments on the proposed mechanism for collecting the levy via PAYE?

No.

3. In your opinion, how should the size of firm paying the levy be calculated?

We think it would be beneficial for the sake of focus on the programme and awareness of its availability for the size range to be as wide as possible. Perhaps a sliding scale of levy could be applied that resulted in small firms contributing at least small amount.

4. Should employers be able to spend their apprenticeship funding on training for apprentices that are not their employees?

Yes, we would support this to allow for collaborative working.

Employers operating across the UK

5. How should the England operations of employers operating across the UK be identified?

No comment.

Allowing employers to get back more than they put in

6. How long should employers have to use their levy funding before it expires?

A year is not enough. Structured training programmes can have annual cycles so lead times need to be at least a year.

7. Do you have any other view on how this part of the system should work?

No.

8. Do you agree that there should be a limit on the amount that individual employer's voucher accounts can be topped up?

We have no view on this, but do not see why employers should be limited if they wish to contribute more to the scheme.

9. How do you think this limit should be calculated?

No comment.

10. What should we do to support employers who want to take on more apprentices than their levy funding plus any top ups will pay for?

We suggest promoting a scheme of collaborative working and/or promoting apprenticeship training already provided by FE colleges and the like.

The levy is fair

11. How can we be sure that the levy supports the development of high-quality apprenticeship provision?

Apprenticeships, like any other form of education or training, should have quantifiable outcomes. There are already a host of accreditation agencies and other awarding bodies. The proposals need to make use of programmes and providers that already exist where possible.

12. How should these ceilings be set, and reviewed over time?

We have no view on this.

13. How best can we engage employers in the creation and wider operation of the apprenticeship levy?

By including them in the levy, even if nominally – see our answer to Q3.

Giving employers real control

14. Does the potential model enable employers to easily and simply access their funding for apprenticeship training?

We have no view on this.

15. Should we maintain the arrangement of having lead providers or should employers have the option to work directly with multiple providers and take this lead role themselves if they choose to do so?

Some employers already have substantial training programmes which are well run. So this option should be available but should be subject to evaluation to ensure the quality of delivery is maintained.

16. If employers take on the lead role themselves what checks should we build in to the system to give other contributing employers assurance that the levy is being used to deliver high quality legitimate apprenticeship training?

There clearly need to be checks (see Q15) and the participation of providers in the process would seem to be indicated.

17. Should training providers that can receive levy funding have to be registered and/or be subject to some form of approval or inspection?

Yes.

18. If providers aren't subject to approval and inspection, what checks should we build in to the system to give contributing employers assurance that the levy is being used to deliver high quality legitimate apprenticeship training?

We are not sure this can be achieved. The paramount feature of the scheme must be that apprentices receive high quality training. This cannot be guaranteed by self regulation.

19. What other factors should we take into account in order to maximise value for money and prevent abuse?

We have nothing to add.

The levy is simple

20. How should the new system best support the interests of 16-18 year olds and their employers?

We have no view on this.

21. Do you agree that apprenticeship levy funding should only be used to pay for the direct costs of apprenticeship training and assessment?

We have no view on this.

22. If not, what else would you want vouchers to be able to be used for and how would spending be controlled or audited to ensure the overall system remains fair?

We have no view on this.

23. Are there any other issues we should consider for the design and implementation of the levy that haven't been covered by the consultation questions we have asked you?

Yes. We were very disappointed that the CITB has withdrawn core funding from the National Heritage Training Group. There is very considerable financial and cultural capital contained in the national stock of heritage and other traditionally constructed buildings. This needs to be properly maintained in the interests of sustainability and the retention of embodied carbon. The skills in the specific trades involved in this are vitally important and help to meet Government targets on energy use and greenhouse gas emissions. The IHBC would like to see the model for the use of the proceeds of the levy take specific interests of the heritage arm of the construction industry into account. These include the involvement of many small enterprises and very specific skills and heritage variations of normal construction industry trade skills.

Do you have any other comments that might aid the consultation process as a whole?

Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.

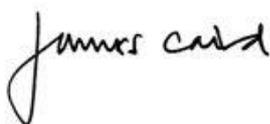
We were unable to make the response form operate as intended. We suggest that forms be written in html to allow for maximum interoperability.

Please acknowledge this reply.

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

Yes.

Yours faithfully



James Caird
Consultant Consultations Co-ordinator

