



# The Road Haulage Association

## **Response of the Road Haulage Association to the Scottish Government.**

### **“Defining an Apprenticeship”.**

**18/12/2017**

#### **Background about the RHA**

The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,000 members, operating near to 100,000 HGVs, range from single-truck firms to those with thousands of vehicles. These companies provide essential services on which the people and businesses of the UK depend.

We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, including training.

We would like to thank The Scottish Government for the consultation and the opportunity to comment on the issues raised.

#### **Responses to the Questions**

##### **Q1 a) Do you agree with this principle?**

Yes

##### **Please give a reason for this answer:**

Apprenticeship frameworks must work for all industries. To achieve this there must be input from a wide range of stakeholders, including professional bodies, union reps, trade bodies and regulatory bodies as well as employers themselves. Industry cannot afford another apprenticeship framework that is not suitable for all industries.

**Q1 b) How can we achieve more involvement from employers, particularly SMEs, in developing the requirements for apprenticeships in their particular industry?**

Since the introduction of the Levy and having had difficulty accessing apprenticeship frameworks in the past, for example road haulage, employers are already aware of apprenticeship frameworks and are therefore very keen to be involved in this process. Ensuring inclusion of the bodies mentioned in Q1a will also help to ensure employers are well engaged.

**Q2 a) Do you agree that all apprenticeships should include an accredited qualification?**

Yes

**Q2 b) Where specific professional qualifications are a mandatory requirement to operate in a sector, should they also be a mandatory requirement of the apprenticeship?**

Yes

**Please give a reason for your answers:**

Accredited qualifications prove competence of the individual and offer piece of mind for employers. They give a sense of achievement and progression for the learner and therefore benefit both employees and employer through greater competence and confidence in individuals.

**Q3 a) Should apprenticeship frameworks include additional units to support the development of generic or cross-sectoral skills?**

Yes

**Q3 b) If yes, what skills are necessary to apprentices to support their future career development?**

Skills such as IT literacy and communication skills play an important role in all sectors and should not be taken for granted. Confidence related units should form part of the apprenticeship to assist learners become ready for the workplace and to excel in their chosen sector.

**Q4 a) Are Core Skills still relevant for Modern Apprenticeships at SCQF Level 5-7?**

Yes

**Q4 b) If yes, should all Core Skills be separately assessed?**

Yes

**Please give a reason for your answers:**

Core skills form the basis for all employment. Therefore these should not be overlooked as unimportant or be taken for granted as being at the required level. These skills should be assessed at the beginning of the apprenticeship to provide a benchmark and then tailor any training. These should then be assessed again at the end of the apprenticeship in the form of a trade test to prove competency.

**Q5 a) Should all apprenticeships in Scotland require consolidation of learning (such as end assessment, appraisal, review) as well as continuous assessment?**

Yes

**Q5 b) If yes, what methods to consolidate learning would be most useful and appropriate?**

Consolidation of learning demonstrates there has been a true transfer of knowledge throughout the apprenticeship and will prove to be useful for all concerned. The use of a trade test will give employers confidence that apprentices are at a satisfactory level of competence to enter the sector. This is particularly relevant for highly skilled roles such as HGV driving.

**Q5 b) If no, please explain why you feel this is unnecessary, stating any sector-specific relevance?**

N/A

**Q6 a) Is it desirable to introduce a 'core and options' approach to apprenticeships across a sector?**

Yes

**Q6 b) What challenges and opportunities might this approach present?**

This approach would ensure consistency and give a baseline of knowledge across a sector which we see as a huge opportunity & benefit. For example, in a highly regulated road haulage industry it would be desirable for all workers to have a basic knowledge of industry legislation such as driver's hours & operator licencing. To achieve this there would be a greater onus on training providers to ensure consistency of teaching across the sector through taught & standardised modules.

**Q7 a) Do you agree with introducing a requirement for a trained mentor to support apprentices?**

Yes

**Please give a reason for your answer:**

The degree of success of an apprenticeship relies on apprentices receiving the correct level of support and guidance from their employers as well as training providers. A trained mentor would ensure any support is at the correct level and ensure a level of consistency for all learners. It would give as much benefits to the staff member who is a mentor as well as the apprentice themselves.

**Q7 b) If yes, how can we ensure this requirement is met?**

The trained mentor can be subject to a "sign-up" process by signing a declaration and then be included in the assessment process throughout the apprenticeship.

**Q8 a) Should each apprenticeship in Scotland require mandatory off the job learning?**

Yes

**Q8 b) What would be the advantages and disadvantages of introducing mandatory off-the-job training for all Scottish apprenticeships?**

The disadvantages are far outweighed by the advantages. Losing a member of the workforce could be deemed as a disadvantage for employers but we believe it would be manageable if this obligation was time limited, say to a minimum of 1 day per month. The advantages would be that the learner would receive a level of professional training an employer may not be able to provide and this should be specific to the subject / sector of the apprenticeship. The learner should receive a greater level of understanding in the subject matter they are learning therefore improving their ability & confidence to undertake the roles expected of them.

**Q9 a) Would a minimum duration for all apprenticeships in Scotland add value to apprenticeships in Scotland?**

Yes

**Q9 b) Should a minimum duration for each individual apprenticeship framework be defined and set by the sector?**

Yes

**Please give a reason your answers:**

A minimum duration must be set by the sector as each has different requirements and levels of qualifications to achieve. For example, a lorry driver can achieve the correct driving entitlement between 6 & 8 weeks of starting, however will not be ready for work at this time. On the other hand an office worker has very different requirements and can be reasonably expected to complete aspects of the job from day one, learning as they go.

**Q9 c) If a minimum duration was introduced, how should duration be defined? For example, a set time period from the date of registration?**

It would be reasonable that for new employees this would start from the date of starting employment and for existing employees for this to be the date of registration on to the programme.



**Q10 a) Would an apprenticeship agreement between employers and apprentices be a useful addition?**

Yes

**Q10 b) What roles and responsibilities should an apprenticeship agreement include?**

**i) The employer should:**

Sign a declaration confirming the apprenticeship – yes

Confirm the content of the apprenticeship and identify learning opportunities – yes

Understand what support they need to have in place to support the apprentice – yes

**ii) The apprentice should:**

Sign a learning agreement which sets out their roles and responsibilities – yes

Confirm the content of the apprenticeship and requirements to meet learning outcomes – yes

Identify learning opportunities with the support of their mentor – yes

**Q10 c) Do you think employers or apprentices require additional support to meet the responsibilities contained within the agreement?**

Yes

**Q10 d) If yes, what support might be required?**

The support of training providers throughout an apprenticeship is very important and as such their duties should not be limited to assessment. Where training is identified there should be a collaborative approach to ensuring this is delivered and where possible, training providers should be delivering an element of this training as part of the funded programme.

The training provider could be covered by a third party agreement between the 3 parties; employer, employee & provider which outlines very specific requirements.



**Q11 a) How can quality organisations work together to strengthen quality assurance in apprenticeships?**

There should only be one level of assurance for apprenticeships preventing an “open market” of commercial enterprises offering different levels of assurance. This would maintain the integrity of Scotland’s apprenticeships while still ensuring that all industries are delivering apprenticeships in Scotland to the same standard.

**Q11 b) How can we embed equality into the principles of quality assurance to ensure that apprenticeships are fully accessible for all equality groups?**

At the time of responding to this consultation we are not aware of apprenticeships not being accessible to all equality groups.

**Please use the space below to make any final comments.**

The RHA welcomes many of the proposals in this consultation. The Apprenticeship framework in its current form is not fit for purpose for the Road Haulage industry and so there is scope for improvement. Many hauliers find themselves as Levy payers due to the nature of their businesses however they are currently unable to access the funds to deliver industry specific apprenticeships.

It is of vital importance that any new frameworks are designed with employers and industry representatives to ensure they are accessible to everyone. The road haulage industry is suffering an extreme skills shortage, particularly professional drivers and a suitable apprenticeship model could be key to addressing this change & upskilling Scotland’s workforce.

Training providers will play a vital role in ensuring this goal is met, but their roles & responsibilities in delivery must be addressed for a more coherent approach to delivering the training required in order to gain an apprenticeship.

Since the introduction of the levy we believe that any funding for apprenticeships should go directly to the employers so they can direct the funding to achieve the best results for both the apprentices and their business.



# The Road Haulage Association

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