

LGA Guidance on completing the reporting process for the Public-Sector Apprenticeships Target

The public-sector apprenticeships target was introduced by government in April 2017 and sets a target for any public-sector employer in England with at least 250 employees to employ an average of 2.3% of their staff headcount as new apprentice starts between 1 April 2017 and March 2021.

All public-sector bodies in scope must report annually on their progress towards meeting the target. The target is for new apprenticeship 'starts', which includes both newly employed apprentices and any existing employees that have begun an apprenticeship.

Each local authority's target is based on the headcount of their organisation (not FTE), and will include community and voluntary controlled schools, Fire and Rescue Services and other services where the local or combined authority is the employer.

The legislation that introduced the target is clear that public bodies in scope should 'have regard to' it, however there are currently no sanctions in place for any public body that fails to meet its target.

Local authorities have until 30 September to complete their returns and submit them to government. As well as the data return, local authorities are also required to publish some information about their progress towards meeting the target by 30 September. There are no prescriptions about what form this publication should take, but the information must be easily accessible to the public.

Completing the data return

Statutory guidance is available on what information you need to provide and can be accessed [here](#). A presentation from the ESFA on how the reporting process works is available in our KHub group [here](#).

As well as submitting key facts and figures, local authorities also have the opportunity to provide a narrative to explain their performance in meeting the target. Local Authorities are free to fill this in however they choose to do so, however, the LGA urges local authorities to consider including the following points in any response they provide, tailored to their own local situation:

Schools

The inclusion of schools in both the public-sector target and the apprenticeship levy has been of significant concern for many local authorities, given the very limited influence they have over recruitment in schools. During the consultation process around the introduction of the target, the government, after lobbying from the LGA, agreed to allow local authorities to include information about schools in their data returns. This was to allow councils to compare schools' performance against their share of the target with the local authority's own corporate performance. Unfortunately, there is no specific section to include schools' numbers separately in the online portal. **We are therefore strongly encouraging councils to report schools' numbers as part of their narrative.**

We know from our recent survey data that councils are doing much better at meeting their share of the public-sector target than schools are. Based on data from 78 LAs so far, on average, a council is meeting 57% of its own portion of the target, compared to just 18% for schools.

The reasons for schools' underperformance against the target are numerous, but include:

- **Lack of appropriate teaching standards being in place during the first year** – standards for teachers, teaching assistants, early years and school business managers were not available immediately, and in some cases, are still in development;
- **Variable interest from schools** not used to delivering apprenticeships themselves before;
- **Limited budgets** leading to lack of resources to pay for things like apprenticeship salaries;
- **Limited knowledge of apprenticeships** – too much emphasis has been put on LAs to communicate the apprenticeship reforms to their schools and there has been limited communication on apprenticeships from other sources, leaving many schools unsure of how the policy works or what is on offer. Many LAs lack the staff and resources to be able to work with every school in their area to explore opportunities and increase starts;
- **A public-sector target that doesn't reflect capacity**, since many schools employ part-time staff, which in turn inflates headcount;
- **The inclusion of many small primary schools** who would be too small to pay the apprenticeship levy if not council maintained, lack capacity and budget to create apprenticeships. Their 'share' of the Levy is often too small to fund training for even one post, while in many rural areas, with large numbers of small primary schools, distances between schools are often lengthy, making pooling funds and apprentices between schools impossible;
- **20% Off-the-Job training** has proven to be a barrier for many schools, who are reluctant to see a staff member have to take time away from the classroom;
- **Other pathways into teaching provide a more enticing offer for schools** looking to recruit staff, as they often cost the school less than an apprentice would, and they do not lose a staff member for 20% of the time to off-the-job working. So long as other routes into teaching are seen as more prestigious and cost-effective for schools, apprenticeship numbers for teachers will remain low.

LGA Recommended Response:

- Highlight performance of schools in the narrative
- Contrast this with your LAs corporate performance (if stronger)
- Emphasise the problems with attracting apprentices into schools
- Call for a specific section to be added to the reporting form to allow schools numbers to be reported separately

Lack of available Apprenticeship Standards

Following the Richard Review of Apprenticeships in England, the government decided to replace existing apprenticeship frameworks with new, more rigorous apprenticeship standards. As part of these reforms, no new apprenticeship frameworks have been

developed or issued since 31 August 2014. However, the transition to the new system of standards had not been completed in time for the Apprenticeship Levy coming on line. As a result, there were many key areas for local government where apprenticeship standards were not in place, and, in some cases, where the frameworks they were replacing had been switched off.

An LGA survey of local authorities highlighted several gaps in provision of standards, including Firefighters, Social Workers, Nursing, Teaching, Occupational Therapy, Leadership, Procurement, Higher Level Planning, Public Health, Business Analyst and some degree level apprenticeships.

Councils have tried to address this themselves by getting stuck into trailblazer groups to design new standards, and there are currently 91 local authorities who are currently involved in a trailblazer to develop a new standard.

A clutch of local government-relevant standards were approved for use during February and March 2018, which local authorities won't have yet had the opportunity to use during the first year of the Levy, but will now going forward. These include Community Energy Specialist (L4), Community Sport and Health Officer (L3), Operational Firefighter (L3), Policy Officer (L4), Regulatory Compliance Officer (L4), and School Business Professional (L4). However, some local authorities have reported difficulties in finding providers for many of these new standards, which is causing further delays and hampering take up.

In addition, there are trailblazer groups developing the following standards, which have still not yet been approved for delivery:

- Children, Young People and Families Manager (L5)
- Children, Young People and Families Manager (L4)
- Social Worker (L6)
- Chartered Town Planner (L7) [Final Approval expected Spring/Summer 2018]
- Lead Practitioner in Adult Care (L4)
- Leader/Manager in Adult Care (L5)
- Occupational Therapist (L6)
- Teaching Assistant (L3)

Further, the L6 Degree-Level Apprenticeship for Teachers, although approved in October 2017 has not yet seen any starts due to it being approved after the academic year had begun. We expect to see starts on this standard from August/September 2018.

LGA Recommended Response:

- Highlight the lack of available standards
- Explain which standards that have not yet been approved you want to use but haven't yet been able to
- Mention any instances where your local authority has been part of a trailblazer group

Procurement

When the government announced their apprenticeship reforms, they provided guidance to public bodies that they would need to follow Public Contracts Regulations 2015 in order to procure apprenticeship training. This has meant that in most cases, local authorities have

had to set up a new procurement process, typically either a procurement framework or a dynamic purchasing system (DPS).

Developing these processes is both complex and time consuming. In many cases, the absence of a framework or DPS has limited how many apprentices a local authority can take on board, with only small cohorts or individual apprentices able to be hired until a solution was in place. This has hampered progress towards meeting the target in many local authorities, who also did not have long to plan for the implementation of the Levy, with the final funding policy only confirmed a few months before the Levy came online.

LGA Recommended Response:

- Highlight your procurement challenges
- Emphasise the length of time it has taken your LA/group of LAs to develop your procurement process

For more information on the procurement options available to you, please refer to the LGA's Apprenticeship Procurement Guide [here](#).

Resources

The LGA calculated that the Apprenticeship Levy would cost local authorities in the region of £600m per year (c£200m paid into the Levy, and a further £400m in additional costs such as staff salaries, administration, procurement etc). Year on year this will reach almost £2 billion by 2020 and add further pressure on councils already having to make significant savings over the next four years. To meet the public-sector target, councils with more than 250 staff are required to delivery around 31,000 new apprenticeship starts each year by 2021.

The local government workforce has shrunk considerably since 2010, in some cases by up to 40%. This has inevitably led to reduced workforce capacity to support and deliver training and development, including for apprenticeships. Support for internal programmes has been reduced due to lack of funding, and there is no longer any additional capacity in local government to run or manage apprenticeship programmes. Much of this decline in workforce numbers relates to roles being lost or other agencies delivering council services.

Many local authorities have levy contributions of £500,000 per year or more. For most large projects of this size, councils would have access to funding to be able employ a project management team to lead on apprenticeships across the organisation. Although some local authorities have found the resources to be able to do this, the prohibition on using Levy funds for anything other than the cost of the training has left most councils having to bear the cost of managing their apprenticeship programme themselves, with already over-stretched staff members having to step in. Relaxation of these rules to allow some Levy funds to be used to resource the administration of an apprenticeship programme would significantly help local authorities undertake the work necessary to identify starts and deliver a sustainable programme.

LGA Recommended Response:

- Highlight any resource issues your local authority has that are preventing you from undertaking key tasks in the development of your apprenticeship programme
- Call for apprenticeship levy rules to be relaxed to allow levy funds to be used to resource the administration of an apprenticeship programme.

Headcount vs FTE

The LGA strongly lobbied against the government's decision to base the public-sector target on an organisation's staff headcount rather than full time equivalent (FTE). Given the large number of part-time workers in both local government, and maintained schools, this does not represent an accurate reflection of local government's capacity to deliver an increase in apprenticeship starts, and results in challenging and unachievable targets.

The LGA successfully lobbied for local authorities to be able to include their organisation's FTE figures in the public-sector reporting form, and there is a box on the online form to allow you to report these figures, though it is optional rather than required. We strongly urge councils to report these figures as well to demonstrate the mismatch between headcount and FTE.

LGA Recommended Response:

- Include your council's FTE figures in the box provided on the online reporting form
- Emphasise the difference between your council's headcount and FTE in the narrative and highlight what your 2.3% target would be if FTE was used as the measure instead.

Jamie Saddler
Apprenticeships Adviser, LGA
April 2018