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Evaluation of Work-Based Learning Programme 2011-15: Traineeships

EVALUATION OF WORK-BASED LEARNING PROGRAMME 2011-15:
TRAINEESHIPS

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Views expressed in this report are those of the researcher and not necessarily those of the Welsh Government

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Glossary

ACL	Adult and Community Learning
ALN	Additional Learning Needs
ALS	Additional Learning Support
B2E	Bridge to Employment (strand of Traineeships)
CW	Careers Wales
EET	Education, Employment or Training
EPC	Engagement and Progression Co-ordinator
ES	Essential Skills
ESF	European Social Funding
ESOL	English for Speakers of Other Languages
ESW	Essential Skills Wales (Qualification)
FE	Further Education
ICT	Information, Communication and Technology
liP	Investors in People
JGW	Jobs Growth Wales
LFS	Labour Force Survey
LLWR	Lifelong Learning Wales Record
LMI	Labour Market Information
NEET	Not in Education Employment or Training
NTFW	National Training Federation for Wales
PSM	Propensity Score Matching
UKCES	UK Commission for Employment and Skills
WBL	Work-Based Learning
WEFO	Wales European Funding Office
YEPF	Youth Engagement and Progression Framework

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Executive Summary

1. The Welsh Government commissioned York Consulting, in association with Old Bell 3, Cardiff University and IFF Research to carry out an evaluation of the Work-based Learning Programme 2011-15 (WBL 2011-15). The evaluation commenced in early November 2013 and continued until November 2015.
2. The Work-Based Learning (WBL) programme included: Apprenticeships; Traineeships; and, Steps to Employment. The aims of the evaluation were to:
 - Assess the effectiveness of the contracting and delivery for WBL 2011-15.
 - Satisfy WEFO's evaluation requirements for projects receiving ESF funding.
 - Carry out specific evaluation of the delivery of Traineeships.
 - Assess the delivery of outputs, outcomes and impacts.
 - Assess the extent to which the programme has secured the participation of individuals according to protected characteristics.
 - Review how Essential Skills Policy has been embedded in the delivery of WBL and how this has contributed to the achievement of WBL 2011-15 objectives.
3. The methodology involved the following elements: interviews with five Welsh Government officials, external stakeholders and training providers; review of Traineeship management information and programme performance data; document review; telephone survey of 45 employers; telephone survey of 209 past Traineeship participants; case studies with seven employers involved with Traineeships.
4. The report is for the whole programme with differences for ESF areas, compared to the rest of Wales, highlighted where they are significant.

Key Findings

5. Over the course of 2011-2015 there had been around 24,500 leavers from the Traineeship Programme. 19,065 of these young people were funded with 65 per cent (12,450) funded through ESF in the Convergence areas of Wales; exceeding the target of 12,120.
6. Performance improved in the second and third years, with increased volumes and improved outcomes; reaching 68 per cent positive progression in 2013/14, closer to being classed as 'good', based on Welsh Government criteria.
7. Overall ESF targets were achieved for total participation, female involvement and numbers progressing into employment. However, targets for qualifications and progression into further learning were not met.

Perspectives of those involved in the programme

8. All stakeholders and providers generally agreed that young people: were low on confidence at programme entry; had low qualifications and skills; sometimes had negative experiences of learning from school; had the potential to contribute positively; typically just wanted a job with less value placed on learning.
9. Traineeships were regarded by stakeholders as the right way to deliver support to the client group but with concerns about implementation. Some of the concerns expressed by stakeholders included the size of contracts, lack of flexibility and tailored provision, turnover of provider staff, competence of provider staff, lack of partnership between providers, lack of employer engagement, lack of support for young people with complex needs and lack of involvement by Careers Wales. These issues are explored in more detail in section five of the report.
10. Most providers perceived a challenging client group, lack of recognition of some types of progression, insufficient resource, lack of national promotion/marketing, completers not ready for Apprenticeships, lower intensity of Careers Wales

involvement and disputed the readiness of some young people referred to the Engagement strand.

11. Former Traineeship participants were generally positive about Traineeships. They valued the support and experience which helped them to find work, gave them confidence and helped them to progress. They were less positive about essential skills/classroom-based learning. This study has not explored in detail the perceptions of young people who drop out or do not start Traineeships.
12. Employers who have been involved were generally positive about Traineeships. Some employers were remarkably patient and understanding of young people's inexperience, unpredictability and support needs. Where employers had negative experiences they cited a lack of information about the young person's needs, lack of support/preparation (linked to provider role and programme design aspects such as lack of support for transport) and lack of commitment of the young person.
13. There was a general view amongst stakeholder and providers that the programme and its purpose was not well-understood by parents, young people and employers.
14. Although the programme appeared to be serving those who participated, there were concerns that a group of young people were often not receiving the support that the original programme design intended. Such young people¹ often identified as Tier 2 in the Youth Engagement and Progression Framework five tier model, required more one-to-one support and additional learning support which providers were not delivering.

¹ Tier 2 refers to unemployed 16 and 17 year olds, known to Careers Wales, who are not available for Employment, Education or Training

Issues around programme elements

15. The Engagement strand worked well for many participants but did not work so well for those with complex support needs. For example, some participants were not ready to move up to 21 hours per week after the first four weeks (when they participate for 12 hours per week); they required a longer period of support at a lower intensity. Others are not ready to engage in centre-based group learning; they require one to one support.
16. The Level 1 strand generally worked well although some individuals were regarded as needing more support before they were ready to progress to an Apprenticeship.
17. The Bridge to Employment strand was barely used; a very small number of participants had been involved.

Wider programme issues

18. Wider programme issues identified through this evaluation included:
 - Contract management arrangements were generally regarded to have improved during the programme period.
 - Not all those referred to Traineeships by Careers Wales actually started. This was often the case for individuals with complex support requirements.
 - In many cases Additional Learning Support (ALS) budgets were not used due to perceived risks of not drawing down funds and concerns about the time to make a claim. This was an additional factor limiting the tailoring of provision and support for young people with complex support needs.
 - Delivery of essential skills could be embedded more effectively in some provision.
 - Welsh medium provision was generally being offered and delivered to those participants that needed it.

- Third sector involvement in the programme delivery and provision of placements could be improved.
- There was evidence of providers tailoring provision but it was usually done around a core of standard provision for the needs of that type of participant.
- A good range of vocational options were provided to young people. However, there is no data on how many experience real work placements compared with those that experience simulated work placements environments and how many experience work tasters.
- Overall, providers had good systems in place to support young people during their Traineeship.
- Providers were generally unlikely to involve Careers Wales when they identified a young person is at risk of dropping out of Traineeships.
- Providers were actively involved in planning a progression path for Traineeship participants, supporting them with job search, interview skills and identifying further learning opportunities.

Recommendations

19. The recommendations for consideration include:

- Providers need to ensure employer engagement is sufficient to identify work tasters and placements required to give participants a good experience of the workplace. In particular, there needs to be a stronger focus on engagement of the third sector/voluntary sector especially as a source for young people with greater need for flexibilities or sheltered work environments.
- The Welsh Government should ensure it understands the balance between placements provided in real workplaces and those in simulated environments. This may be possible using existing data or additional variables may be required within the LLWR dataset.

- Extend the period of support at a lower intensity (12 hours per week) from the first four weeks to the first eight weeks.
- Increase collaboration and sharing of good practice between Traineeship providers, for example, around the embedding of essential skills delivery and managing employers' expectations.
- Clarify the role of Careers Wales and enforce Tier level assessments and referrals that are made.
- Review how the approach to marketing the programme can be improved at a national and local level.
- Review the design of the Engagement element to ensure that it can support all young people in scope and offer genuine individually tailored learning. The Welsh Government should explore further the reasons why providers refuse to accept some participants perceived to be borderline clients.
- Review the Level 1 element of the programme to identify opportunities for improved progression to Apprenticeships. This may require the outcome of an Apprenticeship to be incentivised more significantly in the programme design.
- Review the design of the B2E strand to ensure that it can support young people to progress towards Apprenticeships.
- Explore why the additional learner support aspect of the programme is not utilised and redesign the process to ensure the support is accessed where it is needed.
- The Welsh Government should ensure that data are published and reviewed for all targets set in the ESF Business Plan.

1 Introduction and Methodology

1.1 The Welsh Government commissioned York Consulting, in association with Old Bell 3, Cardiff University and IFF Research to carry out an evaluation of the WBL Programme 2011-15. The evaluation commenced in early November 2013 and will continue until November 2015.

1.2 In summer 2010, the (then) Welsh Assembly Government issued an invitation to tender to deliver its WBL programmes between August 2011 and July 2014 (later extended to March 2015). WBL 2011-15 covers three main areas, elements of which receive funding from the European Social Fund:

- **Apprenticeships** - Foundation Apprenticeships, Apprenticeships, Higher Apprenticeships and Flexible Learning.
- **Traineeships** - Engagement Traineeships and Level 1 Traineeships.
- **Steps to Employment** - withdrawn for new entrants on 31 July 2013 and replaced with the Work Ready programme, therefore not part of this evaluation.

1.3 There were a number of other projects related to the WBL programme in that they provided opportunities for young people to gain skills and/or progress towards employment: Jobs Growth Wales, Pathways to Apprenticeship, Shared Apprenticeships and Young Recruits.

Evaluation Overview

1.4 The aims of the evaluation were to:

1. Assess the effectiveness of the contracting and delivery for WBL 2011-15.
2. Satisfy WEFO's evaluation requirements for projects receiving ESF funding.
3. Carry out specific evaluation of the delivery of Traineeships.
4. Assess the delivery of outputs, outcomes and impacts.
5. Assess the extent to which the programme has secured the participation of individuals according to protected characteristics.

6. Review how essential skills have been embedded in the delivery of WBL and how this has contributed to the achievement of WBL 2011-15 objectives.

1.5 The evaluation objectives in relation to the Traineeships programme were to:

- assess the extent to which Traineeships have been individually tailored, identifying best practice where this has been successful and reasons for tailoring not being achieved.
- assess the extent to which Traineeship providers offer a sufficiently wide range of vocational options to meet learners' individual needs and aspirations taking account of local LMI, including sourcing unusual, specialist and Third sector placements.
- assess and evaluate the support offered by Traineeship providers to ensure learners remain engaged with learning.
- assess the extent to which Traineeship providers ensure employers actively support learners through their learning programme.
- assess the extent to which Traineeship providers actively plan a progression path for learners exiting the programme including the engagement of the learner in the process and the range of progression opportunities considered.

1.6 This current phase of evaluation took place between October 2014 and February 2015. It included the following elements (detailed further in Appendix A):

- Interviews with five Welsh Government officials responsible for different aspects of Traineeships provision between 2011 and 2015.
- Interviews with five external stakeholders to the programme, including voluntary organisations, local authorities, Careers Wales and Estyn.
- Interviews with ten learning provider consortia leads/lead contractors.

- A review of Traineeship management information and programme performance data.
- Design of a logic model describing the flow of inputs, processes, outputs, outcomes and impacts addressed by the programme.
- A telephone survey of 102 employers involved with WBL delivery was undertaken in October 2014, covering 45 Traineeship learners. The statistical significance was between +/-8.8 and +/-14.6 percentage points at the 95 per cent confidence level. Where differences are statistically significant these are explicitly referenced in the text.
- A telephone survey of 209 past Traineeship participants was undertaken from 18th November until 14th December 2014. Participants had left the programme between six and 36 months previously. The statistical significance at the level of the whole survey was between +/-4.1 and +/-6.8 percentage points at the 95 per cent confidence level. Where differences are statistically significant these are explicitly referenced in the text.
- Case studies of seven employers involved with Traineeships.
- Preliminary counterfactual impact analysis comparing the Traineeship quantitative survey data to the Annual Population Survey (APS) using propensity score matching (PSM) could not be undertaken with a sample of 209 records as it was too small.

1.7 The report is for the whole programme with differences for ESF areas, compared to the rest of Wales, highlighted where they are significant.

Reporting phases of this evaluation study

1.8 The key reporting stages of this evaluation are as follows:

- Initial phase (focused on WBL contracting) [March 2014]
- Traineeships report [this report]

- Final evaluation report (focusing on Apprenticeships) [Published March 2016]

Acknowledgements

1.9 York Consulting would like to thank all those who have participated in this research for contributing their views including Traineeship participants, employers, providers and stakeholders.

Report Structure

1.10 In the remainder of this report, we discuss:

- policy context within which Traineeships developed
- current arrangements for Traineeships
- performance of Traineeships
- stakeholder and provider perspectives of Traineeships
- Traineeship participants views of Traineeships
- Traineeship placement employers' views of Traineeships
- emerging conclusions and recommendations.

2 Policy Context

Summary

- The UK has a history of supporting WBL programmes for young people such as the youth unemployment programmes of the 1980s leading up to the Welsh Skill Build programme of the 2000s (Wiseman, 2014). In addition, there has been increased recognition of the value of work experience alongside skills development to help create work-ready individuals (Webb 2007).
- The expectation that employers should take greater responsibility through investment in and development of young people, has been an increasing feature of government policy.
- The Youth Engagement and Progression Framework (Welsh Government, 2013a) followed on from Extending Entitlement: Supporting Young People in Wales (2000) and the subsequent guidance on Extending Entitlement: Services and Support for 11–25 Year Olds in Wales (2002) and set out a number of policy ambitions. In addition it articulated a five tier framework for classifying the support requirements of young people.
- Feedback from providers, employers, Estyn, Welsh Government policy officials and contract managers in late 2013 indicated that the programme had not been utilised to its full potential, and in reality had not offered a truly new and innovative response to the individual needs of those in the eligible learner group (Turner, 2014).
- A number of more recent developments which took place in early 2015 may have addressed some of these criticisms, such as new contracting consortia, improved networking of providers (through an enhanced role for the National Training Federation for Wales) and national marketing.
- Cross cutting themes were identified around: Female participation/non-traditional roles; Work Limiting Health Conditions; and STEM subjects.

Introduction

2.1 This section outlines the WBL policy background across the UK and Wales, describes Welsh Government Traineeships policy and outlines the cross cutting themes which Traineeships aim to address.

WBL Policy Background

2.2 The UK has a history of supporting WBL programmes for young people such as the youth unemployment programmes of the 1980s leading up to the Welsh Skill Build programme of the 2000s (Wiseman, 2014).

2.3 Vocational skills development has been increasingly prioritised by successive governments, in Wales and across the UK. At an economic level, skills are seen as underpinning national competitiveness, hence the Welsh Government has emphasised raising the volume of skills in the workforce as a key economic priority (Wiseman, 2014; Welsh Assembly Government, 2008).

2.4 At the level of the firm WBL programmes seek to raise productivity and efficiency. For individuals, they seek to increase the chances of a rewarding career with financial returns to skill development. For society, they seek to increase social inclusion and social mobility and to reduce poverty. However, concerns have been raised about over-supply of skills (Wolf, 2011) and limited returns on investment (Keep, 2008).

2.5 There has been increased recognition of the value of work experience alongside skills development to help create work-ready individuals (Webb 2007). However, there remain differing views on who should be responsible for funding the training of young people. The existence of the 'youth guarantee' in various guises over the past 30 years has set expectations that the government would support young people aged 16 and 17 to gain a foothold in the labour market, particularly in the face of tough economic conditions.

- 2.6 The general approach across the UK for the past 30 years has seen government fund training providers to implement various national WBL programmes. However, the expectation that employers should take greater responsibility through investment in and development of young people has been an increasing feature of government policy (for example, the BIS/UKCES Employer Ownership Pilot and to a lesser extent Welsh Government ESF programmes such as the Sector Priorities Fund Pilots).
- 2.7 Increased attention has been focused on raising businesses' awareness of the importance of skills development and integrating it into business strategies (such as High Performance Skills explored by UKCES and WESB). However, the pressure of the financial crisis and recession of 2008 led to reduced recruitment of young people (Hasluck, 2011) and reduced training budgets (UKCES, 2013).
- 2.8 Over the past ten years successive governments in Wales have focused on reducing complexity and management costs through reducing numbers of providers (Welsh Assembly Government, 2008).
- 2.9 The Youth Engagement and Progression Framework (Welsh Government, 2013a) followed on from Extending Entitlement: Supporting Young People in Wales (2000) and the subsequent guidance on Extending Entitlement: Services and Support for 11–25 Year Olds in Wales (2002) and set out a number of policy ambitions:
- Identifying young people most at risk of disengagement.
 - Better brokerage and coordination of support.
 - Stronger tracking and transitions of young people through the system.
 - Ensuring provision meets the needs of young people.
 - Strengthening employability skills and opportunities for employment.
 - Greater accountability for better outcomes for young people.

2.10 The intention was that these would be supported by the allocation of single point of contact (a lead worker) to the most at-risk young people *“to help ensure that support is delivered in a joined up and coordinated way and that works to meet their needs”* and through the development of a proactive and positive Youth Guarantee that *“will help to ensure that every young person has access to a suitable place in learning post-16”*.

2.11 The ambition was that lead workers would provide continuity through the transition which young people make at age 16, with lead workers supported through the first three months of the learner’s time in post-16 education and training, except where the lead worker was a learning coach. At this point young people would be re-assessed as part of the following five tier model and a decision reached on whether the support from a lead worker should continue or not:

- Tier 5 Young People in Further Education, Employment or Training (EET): sustaining education, employment or training (EET); working or studying part time over 16 hours; and, voluntary work.
- Tier 4 Young People at risk of dropping out of EET: those engaged in less than 16 hours of EET; those who have been identified at risk of disengagement pre-16 and/or judged as at risk of not making a positive transition who are subsequently in FE, sixth form or training; those who have been made aware to CW by EET providers as at risk of dropping out.
- Tier 3 Unemployed 16 and 17 year olds known to Careers Wales: Engaged with CW and/or known to be actively seeking EET; either ready to enter EET, or assessed as requiring career management or employability skills support to enter EET.
- Tier 2 Unemployed 16 and 17 year olds, known to Careers Wales, who are not available for EET/unable to seek EET (sickness, young carers, pregnancy, custody); young people with significant or multiple barriers requiring intensive personal support.

- Tier 1 Unknown status on leaving Careers Wales services: Young people unknown to Careers Wales.

Traineeships Policy

2.12 The term 'Traineeship' was first used by the (then) Welsh Assembly Government in the brand 'National Traineeship' which supported level 2 learning. This subsequently became the Foundation Apprenticeship as the Apprenticeship brand and supporting policy developments evolved.

2.13 The term was re-introduced in its current form when the Skill Build programme ended in 2011. Particular criticisms of Skill Build which Traineeships sought to address included:

“Skill Build had not achieved wide recognition by employers and had little brand value amongst participants, being widely associated with failure. It was described as being too frequently part of the ‘revolving door’ phenomenon in which people went through cycles of unemployment, short periods of insecure employment, and participation in skills programmes without ending up in a reasonable job which lasts.” (Wiseman, 2014)

2.14 Furthermore, Traineeships were planned to have “clearly defined stages within them aimed much more clearly at progression towards employment and are more flexible as to the volume of skills development they supply. Whereas Skill Build had become known (not entirely accurately) as a ‘13 week programme’, Traineeships will not have a fixed schedule for all individuals but will supply the level of input which individuals need to become work-ready. It is not intended that the programme should be restricted to low-ability individuals and will be equally available to, say, young people with A/S level qualifications but who have dropped out of college or school” (Wiseman, 2014).

- 2.15 Traineeships was defined as a non-employed status training programme for 16-18 year olds not otherwise engaged in post-16 education or employment, and has been available since 1 August 2011 as a successor programme to Skill Build. The Traineeships programme supports young people to gain sustained employment by helping them with their confidence and motivation, and looks to address barriers to learning – all of which may prevent a young person moving into employment or learning at a higher level. The programme sought to improve skills levels through the delivery of entry level qualifications up to NVQs or equivalent at Level 1 in their chosen occupational area. This includes the delivery of essential skills qualifications to enhance their learning experience.
- 2.16 In addition, young people would also receive work experience and the support and help they need to learn at a pace suitable to them. This could sometimes be with a dedicated employer or through a simulated work environment, depending on the level of support the young person requires.
- 2.17 Young people on Traineeships had direct access to apply for any Jobs Growth Wales (JGW)² opportunity as a progression, or progress into an Apprenticeship opportunity, as part of a seamless routeway into employment or further learning at a higher level.
- 2.18 The Traineeship programme was developed with the aim of creating a very broad programme specification, providing an opportunity for innovative providers to develop new approaches to meet the complex and diverse needs of a cohort of 16-18 year olds.
- 2.19 The main findings identified in the Estyn initial review of the effectiveness of Traineeships (Estyn, 2013) at an early stage of their implementation included:
- The referral process was not regarded as robust and too heavily reliant on personal relationships rather than efficient systems. The quality of

² Jobs Growth Wales is a programme offering six months opportunity in a job paid at least the National Minimum Wage.

information was regarded as incomplete and not helping providers to match learners to appropriate programmes.

- Eligibility rules and the short length of the programme restricted the levels of learning and progression that learners could realistically make.
- The achievement of target outcomes for learners was hampered by the lack of work experience and sustainable employment opportunities.
- Employers often did not fully understand the programme.
- Contract targets were not being met.
- Learners were being taught in groups that were too small to be educationally or economically viable.
- Standards and progression rates were regarded as “adequate”.
- There was competition between providers for employers who can provide work experience.
- Work tasters were not available in some sectors which meant that learners do not necessarily get the experience in the areas of work they want.
- The majority of providers recorded the needs of learners and addressed barriers to learning.
- Providers worked well with partners to secure a variety of support for learners.
- In a minority of providers, serious client barriers were not identified early enough.
- The standard of basic skills and literacy support provided is too variable.
- All providers had sophisticated management information systems in place to record high level outcomes for learners. Most disseminated this information across their consortium but not all monitor the detail of learner progress well enough to help individual learners to succeed.

2.20 Feedback from providers, employers, Estyn, Welsh Government policy officials and contract managers in late 2013 indicated that the programme had not been utilised to its full potential, and in reality had not offered a truly new and innovative response to the individual needs of those in the eligible learner group (Turner, 2014). In addition some of the negative characteristics identified with previous systems (Wiseman, 2014) such as high levels of competition and limited collaborative behaviour were perceived to remain.

2.21 A number of more recent developments which took place in early 2015 were introduced to address some of these criticisms, such as new contracting consortia, improved networking of providers (through an enhanced role for the National Training Federation for Wales) and national marketing. At this stage in the evaluation it has been too early to comment on the impact of these changes.

Cross cutting themes

2.22 The importance of cross cutting themes was clearly emphasised in the 2015 WBL Business Plan (Welsh Government 2014) with clear statements around the following:

- Female participation/non-traditional roles: “All marketing materials recognise the equality agenda and Careers Wales colleagues are at pains not to stereotype opportunities based on gender...Within the tender and subsequent contract, we placed obligations on providers to adhere to, and monitor, equality of opportunity; we are undertaking periodic review of compliance on these issues and we require our contract holders to remind employers of their obligations under equalities legislation....We believe that we have a clear, well embedded strategy to minimise the risk of gender discrimination.”
- Work Limiting Health Conditions: “In addition, referral to the Traineeships engagement programme (the most likely routeway for individuals with work limiting health conditions) is through Careers Wales. We have introduced quarterly meetings with Careers Wales to receive soft feedback on provider performance, including any practice that restricts recruitment

opportunities. Although not a direct link to this cohort, Careers Wales reports that there has been an increase of approximately five percentage points in referrals into the Traineeship programme in respect of learners with Additional Learning needs – although this figure needs to be confirmed.”

- STEM subjects: “We would not normally highlight which sectors have low female numbers with individuals – there is a risk that this would be counter-productive and discourage some females from being one of the few to challenge traditional roles. However, as mentioned above Careers Guidance would not be presented to stereotype. We are confident that Careers Wales encourages females to consider the range of opportunities available them irrespective of gender.”

3 Current Arrangements

Summary

- The establishment of Traineeships as the successor to Skill Build aimed to create a very broad programme specification, providing an opportunity for innovative providers to develop new approaches to meet the needs of 16-18 year olds facing barriers to further learning or employment.
- The Business Plan for ESF stated that up to 12,120 young people could be supported by Traineeships in the Convergence³ area.
- Traineeship annual delivery expenditure has been between £20 million and £24 million over the first full three year period, across the whole of Wales.
- The delivery of WBL 2011-15 was undertaken through three models of contracting: delivery consortia; lead contractors with sub-contractors; and, lead contractors with no sub-contractors.
- During 2011-15 there were six delivery consortia and 18 lead contractors, with the 13 contractors listed in Table 3.3 delivering minimum contract values of £650,000 for Traineeships. Approximately 120 consortia members and sub-contractors were involved in delivering the WBL programme. In the previous WBL (2007-11) programme, the Welsh Government held contracts with 64 providers, with a minimum contract value of £99,000.
- Generally providers felt that the consortia approach adopted in 2011 had worked well during and was an improvement on previous approaches. Providers were critical of the largely electronic processes, although the

³ The Convergence area of Wales covers the West Wales and Valleys area: Isle of Anglesey, Conwy, Denbighshire, Gwynedd, Ceredigion, Pembrokeshire, Carmarthenshire, Swansea, Neath Port Talbot, Bridgend, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly, Blaenau Gwent, Torfaen.

