

Technical Discussion Paper: Apprenticeship and Company-based Training in Myanmar

This paper summarises the findings of an apprenticeship stock-taking exercise which was decided by the participants of the Employment Opportunity Sector Working Group, led by the Ministry of Labour, Employment and Social Security (MOLES). The study was commissioned by the Swiss Agency for Development and Cooperation (SDC) and implemented by Swisscontact and INBAS under the Vocational Skills Development Program (VSDP).

“Apprenticeship is first and foremost about skill development to the benefit of companies, their employees and the wider economy. However, it is not a sufficient solution to improving the labour market transition of young people with poor school achievements or other disadvantages.”

(Overview of Apprenticeship Systems and Issues. ILO contribution to the G20 Task Force on Employment". November 2012, page 2)

Yangon, January 2016

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Abbreviations and Terminology

ASEAN	<u>A</u> ssociation of <u>S</u> outheast <u>A</u> sian <u>N</u> ations
CVT	<u>C</u> entre for <u>V</u> ocational <u>T</u> raining, a Swiss vocational training centre in Yangon, supported partly by SDC
DVT	Directorate of Vocational Training, Thai government organisation
ESDL	<u>E</u> mployment and <u>S</u> kills <u>D</u> evelopment <u>L</u> aw
EU	<u>E</u> uropean <u>U</u> nion
GIZ	Gesellschaft für Internationale Zusammenarbeit (a German development partner)
GTZ	The GTZ was a German federally owned enterprise for sustainable development with worldwide operations. On 1 January 2011 it was merged with other German organisations into the GIZ
ILO	<u>I</u> nternational <u>L</u> abour <u>O</u> rganisation
INBAS	The Institute for Vocational Training, Labour Market and Social Policy, a German company
MIMU	<u>M</u> yanmar <u>I</u> nformation <u>M</u> anagement <u>U</u> nit
MOLES	<u>M</u> inistry of <u>L</u> abour, <u>E</u> mployment and <u>S</u> ocial Security
NSSA	<u>N</u> ational <u>S</u> kills <u>S</u> tandards <u>A</u> uthority
NTVQF	<u>N</u> ational <u>T</u> echnical and <u>V</u> ocational <u>Q</u> ualifications <u>F</u> ramework
NVTP	<u>N</u> ational <u>V</u> ocational <u>T</u> raining <u>P</u> rogram, a policy to revitalise apprenticeships implemented by MOLES from 1972 to 1975
OECD	Organisation for Economic Co-operation and Development
SDC	Swiss <u>A</u> gency for <u>D</u> evelopment and <u>C</u> ooperation
TEOSWG	<u>T</u> echnical <u>E</u> mployment <u>O</u> pportunities <u>S</u> ector <u>W</u> orking <u>G</u> roup
TVET	<u>T</u> echnical and <u>v</u> ocational <u>e</u> ducation and <u>t</u> raining
UMFCCI	<u>U</u> nion of <u>M</u> yanmar <u>F</u> ederation of <u>C</u> hambers of <u>C</u> ommerce and <u>I</u> ndustry
UNDP	<u>U</u> nited <u>N</u> ations <u>D</u> evelopment <u>P</u> rogramme
VSDP	<u>V</u> ocational <u>S</u> kills <u>D</u> evelopment <u>P</u> rogram

Executive Summary

An apprenticeship is an employment arrangement with the objective that the employee (apprentice) is receiving structured training for a certain occupation at the workplace.

Apprenticeships have a potential for providing skills for a large number of people at relatively low cost for the taxpayer. Although apprenticeships can be organised entirely by the private sector the government also has a responsibility: It has to provide a regulatory framework to limit the risk of exploitation of the apprentice as cheap labour, while at the same time keeping the system attractive for employers.

This paper is analysing current practices of different types of apprenticeships and other forms of in-company training in Myanmar. It is based on two empirical studies recently conducted by Swisscontact/INBAS and GIZ/UMFCCI, and it is intended to provide an input for the discussion of rules and regulations for apprenticeships under the Employment and Skills Development Law (ESDL of 2013).

It can be generally concluded from the findings that formal or regulated apprenticeships do not appear to be practised on a significant scale in the upcoming private sector of the Myanmar economy any more. However, in-company skills development practices found in enterprises comprise elements of apprenticeships, though with different extent. These features and elements can be built upon to develop the currently practised in-company training gradually into more systematic apprenticeships over time. This can, however, not be done overnight. It will take time and requires commitment, interest and support by companies the government and the skills development sector.

The ESDL provides a basic governing structure with the establishment of a Central Employment and Skills Development Body/Committee and the Skills Development Committee to act as a National Skills Standards Authority (NSSA). The study proposes two alternative scenarios to be discussed by these bodies.

The first scenario acknowledges that enterprises in the private sector face many challenges of which skills shortage is only one. Therefore it is sufficient for the time being to only regulate skills assessment and certification (outcomes of training) but not to regulate the delivery of apprenticeships and in-company work-based training. However, industry organisations (chambers, associations) and NSDA may issue joint guidelines (instead of regulations) and provide support to enterprises on improving delivery of in-company training and apprenticeships.

The second scenario suggests that, in addition to the regulation of skills assessment and certification, NSDA (in close collaboration with the private sector) introduces a “light” regulation of the delivery of apprenticeships. Inter alia, this would include compulsory apprenticeship contracts to protect the legitimate rights and interests of young employees and the introduction of a random monitoring and inspection regime by NSSA and/or chambers and sector associations. Furthermore it is suggested in this scenario to introduce the regulatory regime and support structures gradually. It is recommended to start with only one or two economic sectors and slowly expand to other sectors based on this experience. This would allow Development Partners to support the implementation of an apprenticeship system for selected economic sectors.

Advantages and risks of both scenarios are discussed and entry points for support by Development Partners are proposed.

1 Introduction

This paper is analysing current practices of different types of apprenticeships and other forms of in-company training in Myanmar. It is aimed at drawing lessons learnt and is based on studies on apprenticeships and in-company training recently prepared. Successful apprenticeship schemes implemented in the ASEAN Region and neighbouring countries have also been reviewed and are taken into consideration in this analysis. The growing social demand for training as well as the rapidly expanding economy and the resulting demand for skilled labour has been kept in mind throughout the analysis of apprenticeships as a form of in-company training. The analysis looks at experience and models in selected economic sectors (e.g. construction, hotels and tourism, manufacturing, agriculture, cottage industry). Finally, legal provisions and implications for the setting up and implementation of apprenticeships are looked at.

The authors thank SDC Yangon for their inspiration and support and GIZ for the cooperative working spirit.

2 Background and Context

Currently, about 1 million young people are dropping out of the general school system in Myanmar annually. The overwhelming majority of them does not have access to any type of further education or vocational skills development. At the same time it is reported that enterprises are short of people with the right skills. Lack of skilled labour ranks second as very severe obstacle for doing business in Myanmar (after corruption).¹ The institutional (centre-based) TVET system is not well developed and can only provide for a limited number of skilled graduates. The existing TVET system is not providing the quality of skills required in the work place.

Over the last few years Myanmar's economy and industry has been undergoing rapid and fundamental changes. This transition process goes along with changing technologies in enterprises, changing work patterns and thus changing skill requirements. Future skill requirements and the emerging mix of previous (before privatisation) and upcoming work patterns are difficult to predict. It is expected that following the elections the investment climate will further improve resulting in even higher demands for skilled labour in many sectors.

The Government of Myanmar enacted the Employment and Skills Development Law (ESDL) in August 2013. Besides other modes of skills development, the ESDL provides for in-company/on-the-job training and "apprenticeships" (Paragraph 15):

"The employer

- a) May carry out employment-related skills level improvement programs for the workers, providing on-the-job training, providing systematic training in workplace, sending the workers to the outside training, and training of workers with the application of information technology. Training programs can be conducted for each worker or for a group of workers, and for each job or for a combination of jobs.
- b) May employ the youths, who are already 16-year old, as **apprentices** and make an effort so that employed youths can to be trained in employment-related skills **systematically** in line with the regulations stipulated by the Skills Development Body."²

1 OECD / ESCAP / UMFCCI: Myanmar Business Survey 2014, Survey Results, page 6.

2 Employment and Skills Development Law (2013), translated into English by U Phay Ko U, VSDP.

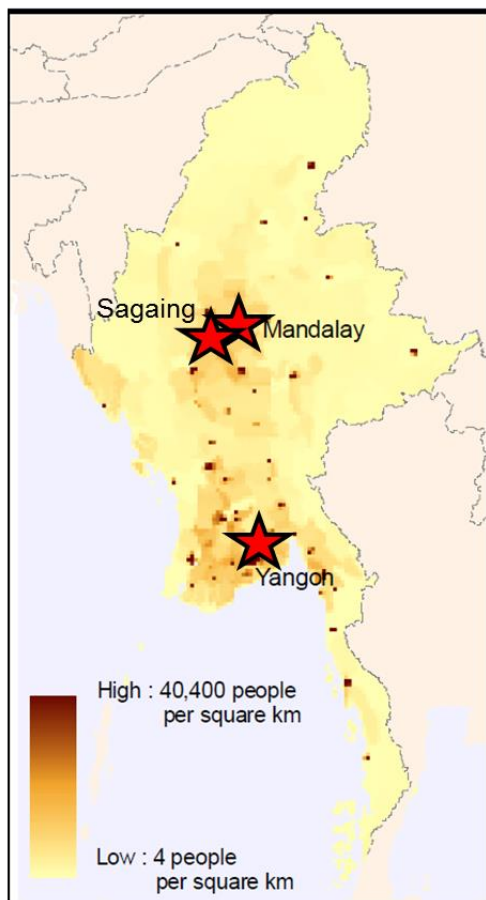
The Ministry of Labour, Employment and Social Security (MOLES), in consultation with representatives of industry (Union of Myanmar Federation of Chambers of Commerce and Industry, UMFCFI) is in the process of developing rules and regulations to operationalise this existing law. This provides a good opportunity for interested stakeholders to strengthen in-company skills development and support the establishment of an apprenticeship system.

Within this context the Technical Employment Opportunities Sector Working Group meeting (TEOSWG) held on 3 December 2014 agreed to address the topic of apprenticeships and in-company training as a form of skills development to complement the existing institutional TVET training. SDC offered to take the lead on this issue, and to make a proposal on how to best move this topic forward in a collaborative and effective way.

Taking this process a step further SDC suggested in February to start with a stock taking study of existing apprenticeship models in Myanmar and in the region. The meeting of the TVET cluster of the TEOSWG approved a related work plan. Meanwhile, UMFCFI, GIZ and Swisscontact/INBAS conducted empirical studies on apprenticeships and other forms of in-company training in Myanmar enterprises.

The following analysis summarises, examines and compares the findings from these studies on existing models of apprenticeships and in-company training in Myanmar. Based on these studies and some other consultations with related stakeholders, the study draws some conclusions and suggests a way forward with the implementation of apprenticeships in Myanmar.

Figure 1: Locations visited in the Swisscontact/INBAS stocktaking exercise
(based on MIMU population density map)



3 Terminology

Apprenticeships

An apprenticeship is an employment arrangement with the objective that the employee (apprentice) is receiving structured training for a certain occupation at the workplace.

Apprenticeships have been an effective way of vocational learning for at least 1000 years all around the world. They assure that the apprentice gets practical skills that are relevant for the job. Besides imparting the skills required in the workplace, apprenticeships are also considered an effective way for young people to acquire the right attitudes, norms, values and work behaviour that contribute substantially to the social integration into the world of work and society. Another advantage of apprenticeship systems in comparison with solely school-based TVET is that they are better suited to align demand for training with demand from the employers: If apprentices do not have to assure a work place before acquiring the skills for an occupation there is a risk that for some occupations there will be many TVET graduates but only few vacancies.

Apprenticeships are different from internships, traineeships and other forms of in-company training because the apprentice is first and foremost an employee. An intern for example is a student who gets some additional work experience to complement her/his theoretical knowledge acquired at a training institution.

There are highly regulated apprenticeships but also informal approaches: The regulated forms of apprenticeships can mainly be found in Central Europe. In many developing countries informal apprenticeships, which show very few formal restrictions and where the apprentice is treated like a family member and lives with her/his "master" for many years, are more common.

Apprenticeships have the potential for providing skills for a large number of people at relatively low cost for the tax payer. Although apprenticeships can be organised entirely by the private sector the government also has a responsibility: It has to provide a regulatory framework to limit the risk of exploitation of the apprentice as cheap labour, while at the same time keeping the system attractive for employers.

The following table defines characteristics of regulated apprenticeships as compared to other forms of in-company training. It will be used to analyse and interpret the findings of the studies on apprenticeships and in-company training.

Table 1: Principal attributes of apprenticeship compared to informal apprenticeship and other workplace-based arrangements

	Wage	Legislative Framework	Workplace based	Programme of Learning	Structured on-the-job training	Off-the-job training	Formal assessment	Recognised Certification	Duration
Traineeship	maybe	no	yes	no	maybe	no	no	no	variable
Internship	no	no	yes	no	maybe	no	no	no	variable
Informal Apprenticeship	Pocket money or in kind	no	yes	no	maybe	no	no	no	variable
Workplace Learning	yes	no	yes	no	maybe	no	no	no	variable
Dual Apprenticeship	yes	yes	yes	yes	yes	yes	yes	yes	fixed

Modified table after "Overview of Apprenticeship Systems and Issues. ILO contribution to the G20 Task Force on Employment". November 2012. P. 3

Apprenticeships in Myanmar

Before discussing apprenticeships in Myanmar it has to be noted that the word “apprenticeship” is (mis-)understood in many different ways and doesn’t translate well into the Myanmar language. This has resulted in the term being used for different forms of in-company training.

At present, only the Centre for Vocational Training (CVT) in Yangon, a Swiss supported institution, is supporting three-year apprenticeships in selected occupations based on the dual apprenticeship model. There are also some other attempts of more structured in-company forms of training, predominately in foreign owned companies. There is also anecdotal evidence that ‘traditional’ apprenticeships are implemented in some cottage-based industries in Myanmar whereby a skilled craftsman or craftswoman offers a young apprentice a place to learn and live within his/her business and household.

It is in this context that SDC and GIZ have launched more research to identify if and what forms other apprenticeships and in-company training exist in Myanmar.

The dual system of vocational education and apprenticeships

For about 100 years some European countries (e.g. Switzerland, Austria and Germany) have "dual systems" of vocational education. These dual approaches combine highly formalised and regulated apprenticeships with school-based education - most commonly at a secondary vocational school but there are also dual higher education courses.

Switzerland and Germany are famous examples, where dual education usually takes about 3 years with classroom teaching usually being provided for 1 day per week. In Myanmar the CVT is organising similar programmes for the past 13 years.

Apprenticeships in the dual system are also called "dual apprenticeships" and are highly regulated: There are training plans/ordinances for workplace training and curricula with learning objectives for the school-based part of learning, certified in-company instructors, logbooks, strict legal and contractual rules, independent assessment and certification through chambers, etc.

4 Objectives and Limitations

For a better understanding of the purpose of this report and to ensure the focus of the work it is important to understand the objectives of the exercise and its context.

Objective of the Apprenticeship Stock-Taking

The objective of the stock-taking exercise under the apprenticeship project has been defined in Terms of Reference as follows:

A comparative analysis of practical case studies of apprenticeships, or “on the job training” methods that can be compared to apprenticeships, success stories but also examples that don't work from the perspective of the employers and the employee/learners, is available as a basis for the development of rules and regulations for apprenticeships (and in-company training) under the Employment and Skills Development Law (ESDL).

In short, the report is intended to provide an input for the discussion of rules and regulations for apprenticeships.

Objectives of the Rules and Regulations for Apprenticeships

The rules and regulations and their objectives will have to be defined by the responsible authority in Myanmar, in this case MOLES. From the viewpoint of the authors the rules and regulations should establish a balance that works for Myanmar between the following objectives:

- On one hand the apprenticeships have to be attractive for employers so they will be willing to use this training approach.
- On the other hand it has to be assured that the apprentices are learning meaningful competencies and are not exploited as cheap labour.

There is a trade-off between these two objectives.

Objectives of Apprenticeships

It also needs to be clarified by MOLES which objectives the apprenticeships themselves are meant to achieve.

Generally, apprenticeships can be an effective approach to reduce the skills gap in Myanmar without creating unaffordable costs for the government and society.

Specifically, the objectives of apprenticeships should be based on the Skills Standards. They define the skills needed for certain occupations and the apprenticeships should be designed with the objective that the apprentice acquires these skills.

Limitations

When discussing about apprenticeships one has to be aware of the limitations of this instrument. It is also important to be aware of the limitations of transferring this model to Myanmar and of the limitations of the stock-taking exercise.

First of all, apprenticeships promote skills development with benefits for the employers and the employees but they are **not** an instrument to create jobs and to address unemployment. Moreover, they are not a sufficient solution to improving the employability of young people with poor school achievements or other disadvantages.³

The studies of Swisscontact/INBAS and GIZ/UMFCCI were conducted in companies in urban and semi-urban townships of Yangon, Mandalay and Sagaing Regions.⁴ A map with the locations visited by Swisscontact/INBAS is presented as figure 1. While the sample of companies interviewed may be fairly representative for these two townships, the findings are probably not valid for other townships and most of rural Myanmar. Therefore the introduction of apprenticeships in regions other than

3 Overview of Apprenticeship Systems and Issues. ILO contribution to the G20 Task Force on Employment". November 2012, page 2

4 The Swisscontact team planned to visit other locations in order to get a more representative feedback. Strict requirements for travel authorisation made it impossible for the international experts to visit companies outside Yangon on short notice. Even within Yangon it was difficult to survey many companies because many of them were reluctant to give interviews. Access to information was a bit easier for the GIZ team. Their questionnaire survey was thankfully implemented with full support of UMFCCI.

Yangon, Mandalay and Monywa (the only three townships with more than 500 enterprises)⁵ may be far more difficult. Enterprises in other regions are mostly small-scale businesses with 1 to 5 employees, many of them employing only family members.

It is also reported that companies in the construction sector and other industries often employ only few permanent staff but resort to casual labour to implement their projects. It is obvious that employers will not invest into training of casual workers.

Last not least one has to acknowledge that in less developed economies employers are hesitant to invest in training of their workforce. One of the reasons for not investing into training certainly is the comparatively high staff turnover due to the mobility of employees. The cost of in-company training is thus considered as a lost investment. "Despite the lack of a well-educated workforce, firms are reluctant to invest in formal training of their workers. Only 15% of firms do so, almost one-third of the average for EAP, and close to half the average for low income economies."⁶

5 Summary of Findings on Apprenticeships and In-Company Training in Myanmar

The following sections summarise and interpret the findings from the research into existing models of apprenticeships and in-company training in Myanmar. It starts with a brief overview of the historical development of formal apprenticeships in Myanmar. This is followed by the analysis of two recently conducted empirical studies. Relevant lessons on apprenticeships from the ASEAN region follow in the concluding chapter.

Brief History of Formal Apprenticeships in Myanmar

Burma was declared an independent republic in 1948. Prior to 1940 the only major industrial activities were associated with petroleum and mining operations, other heavy industries being limited to dockyards that served the inland water transport system, and the railway repair workshops. Light industries were underdeveloped and by 1947 the 573 manufacturing enterprises in the country employed only 46,500 workers.

An Apprenticeships Act was first introduced under British rule in 1850 and apprenticeship training became a preferred training mode in some engineering industries, shipyards and construction but rarely in other sectors such as commerce or retail.

Industrialisation pursued after 1948. Post-war industrial development was largely concentrated on the production of consumer goods, steel mills, aluminium processing plants, some engineering factories, a vehicle assembly plant, building materials production factories, food processing and pharmaceutical industries. Gradually a substantial proportion of the manufacturing and processing industries in the country had been established on a small-scale basis by then.

Between independence and 1970 successive governments had recognised the need for organised practical training for young people coming from primary and middle schools of general education, from which the majority of the labour force at basic skills levels in enterprises was recruited. Because

5 UNDP / MNPED: One Pager Business Census, preliminary results (unpublished presentation), slide 23. According to this survey townships in Mon and Kayin States only have about 100 registered companies each.

6 World Bank Group: Country Highlights Myanmar 2014, page 2.

large numbers of workers were unable to effectively perform the jobs to an acceptable standard, government and enterprises made use of the Apprentices Act (of 1850), which had not been changed much from the original. An attempt to modernise the Apprenticeship Act was made in 1958 but the bill was not enacted.

The apprenticeship approach implemented during that period (until early 70s) followed well-known principles: In general apprentices were attached to sections where trades approved for apprenticeships⁷ were involved in the operational work performed in the industries. They were provided with an organised on-the-job experience while executing work assignments as assistants to the experienced workers. Industrial Enterprises in Myanmar at that time even trained foreign apprentices, for example from Thailand.

Some enterprises provided company-based classroom teaching on work related theory/knowledge to their apprentices. Technical and engineering staff of the companies provided the related theory. Other enterprises took an alternative option of giving apprentices time off on 'day release' basis to attend part-time or evening classes at technical high schools to complement practical work experience with theoretical knowledge.

The work performed by each apprentice was scrutinised and recorded, in some establishments the apprentices had to keep individual logbooks to record their learning progress on a daily basis. The apprentices received an apprenticeship pay that was set by the enterprises themselves.

Apprentices were assigned at several work sections for certain periods and were shifted to other sections in rotation. The lengths of apprenticeships differed from industry to industry. However, in general, it lasted for 18 months or longer depending on the basis of the training policies, types and sizes of industries and the divisions of operational sections.

There were many cases of apprentices who did not want to stay employed with the establishment beyond the completion of apprenticeship period. Apprentices increasingly looked for other opportunities after gaining some industrial workshop experience and with the evidence of skills acquisition provided by logbook records. For example, the documented work experience was recognised by overseas' shipping lines as evidence of skills ("certificates") and often resulted in employment as junior engineers on board of ships. Hence, the apprenticeship scheme had turned into an instrument for providing skills for ship engineers and the prime objective of the apprenticeship scheme had deviated. This was partially reflected in a high rate of apprentice turnover and eventually brought the apprenticeship scheme into a state of deterioration. This negative development was further enhanced by the weakness of in-company training plans and the poor organisation of workplace training. Employers increasingly perceived the apprenticeship scheme as overregulated and as requiring too much commitment. They became increasingly reluctant to comply with the Apprenticeship Act and became cautious of the binding commitments between the employers and the apprentices, which eventually led to a deprivation of the scheme.

It is reported that the apprenticeship system stayed active until some time in the 1970s. At that time establishments like engineering factories, dockyards and railway corporation workshops still had significant numbers of apprentices on a regular basis.

A last attempt to modernise and revitalise the apprenticeship system was made by MOLES with support of UNDP and ILO by launching a "National Vocational Training Program" (NVTP) from 1972 to 1975. Under this programme extensive training needs analyses were conducted, a new

7 Called „apprenticeable trades“ in the legislation.

apprenticeship scheme to train industrial workers was designed and piloted (for metal trades), a comprehensive apprenticeship manual and legislative instruments were developed. However, experts who participated in the NVTP reported that the programme was not successful.

The CVT

The CVT is a non-profit vocational training provider in Yangon that offers 3-year vocational education courses since 2002. Its objective is to offer young people in Myanmar vocational education that responds to needs of the labour market. Its role is comparable to that of a secondary vocational school in the dual system of vocational education in Switzerland.

Vocational education courses are currently provided for five occupations: Commercial Assistant, Electrician, Cabinet Maker, Hotel & Gastronomy Assistant and Metal Worker. The approach is based on the Swiss dual apprenticeship model. The participants are employees of "partner companies", private enterprises in Yangon, where they work most of the time in their respective profession.

CVT complements the practical knowledge the students get at their work places with theoretical aspects during one school-day per week. In addition CVT organises practical training courses of about two to three weeks per year for the students. The curriculum includes both general education as well as job-related subjects including practical aspects that they do not come across at their training companies. After three years the students verify their competencies in final exams. Successful graduates receive a CVT-certificate.

All courses are free of charge for the students. CVT is financed by the "Förderverein für Berufsbildung in Myanmar" a registered NGO based in Sarnen, Switzerland which is mainly funded through Swiss donations. The centre also receives financial support from SDC and the Myanmar government contributes facilities and land for a new school building. The Swiss management board and experts provide their services as volunteers.

Currently CVT employs 31 part-time and full-time teachers who train 575 students in 25 classes. It maintains a network of more than 500 "partner companies".

In addition to the 3-year vocational education courses CVT offers courses in entrepreneurship, courses for instructors and an orientation program for out-of-school youngsters.

Findings of Empirical Studies on Apprenticeships and In-Company Training in Myanmar Enterprises

In 2015 GIZ/UMFCCI and Swisscontact/INBAS launched two parallel studies to identify the current forms of in-company training in Myanmar:

- Gutmann, E. et al conducted a qualitative case study on apprenticeships (and in-company training) in June 2015 covering a total of 32 enterprises in Yangon (20 enterprises) and Mandalay (12 enterprises) on behalf of Swisscontact/INBAS as part of the Vocational Skills Development Programme (VSDP) of the Swiss Development Cooperation (SDC). This study was preceded by a comparative analysis of case studies on apprenticeships in Asian countries (Gutmann, E., July 2015). Major findings of the latter study will be presented in the subsequent chapter.
- Feder, F. undertook a qualitative case study on in-company training in 18 enterprises in Yangon Region in September 2015. This study also analysed data collected on in-company training of 126 companies by Soans Aaron, Abe Masato, Myanmar Business Survey – Data Analysis and Policy Implications, Bangkok, May 2015, on behalf of the Union of Myanmar Federation of Chamber of Commerce and Industry (UMFCCI).

Coverage

The following table shows the numbers of enterprises covered by the Swisscontact/INBAS and GIZ/UMFCCI studies by economic sector and size⁸. The sample of enterprise selected by the studies provides a fairly representative picture of the current economic structure in Yangon and Mandalay regions.

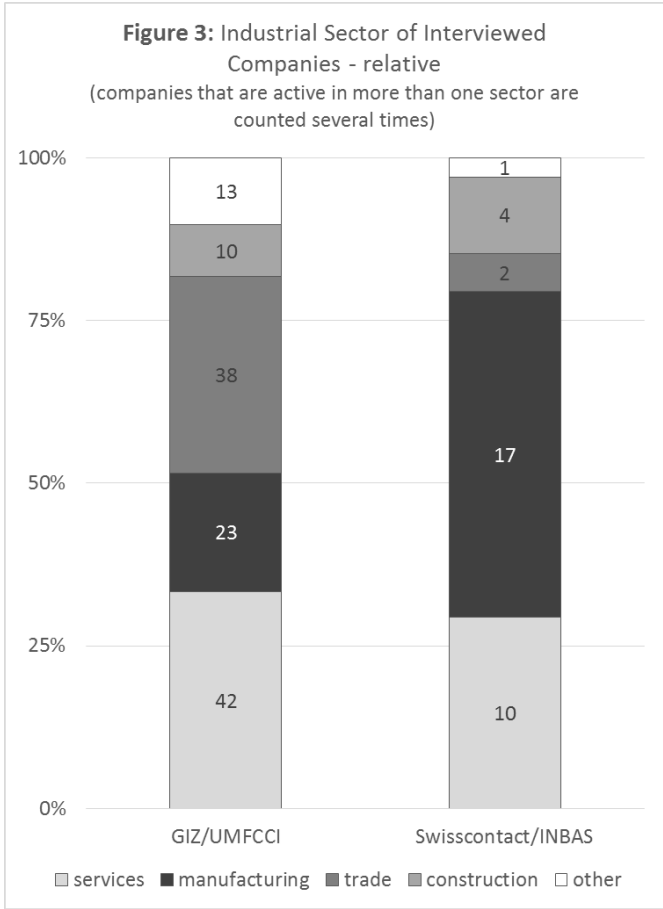
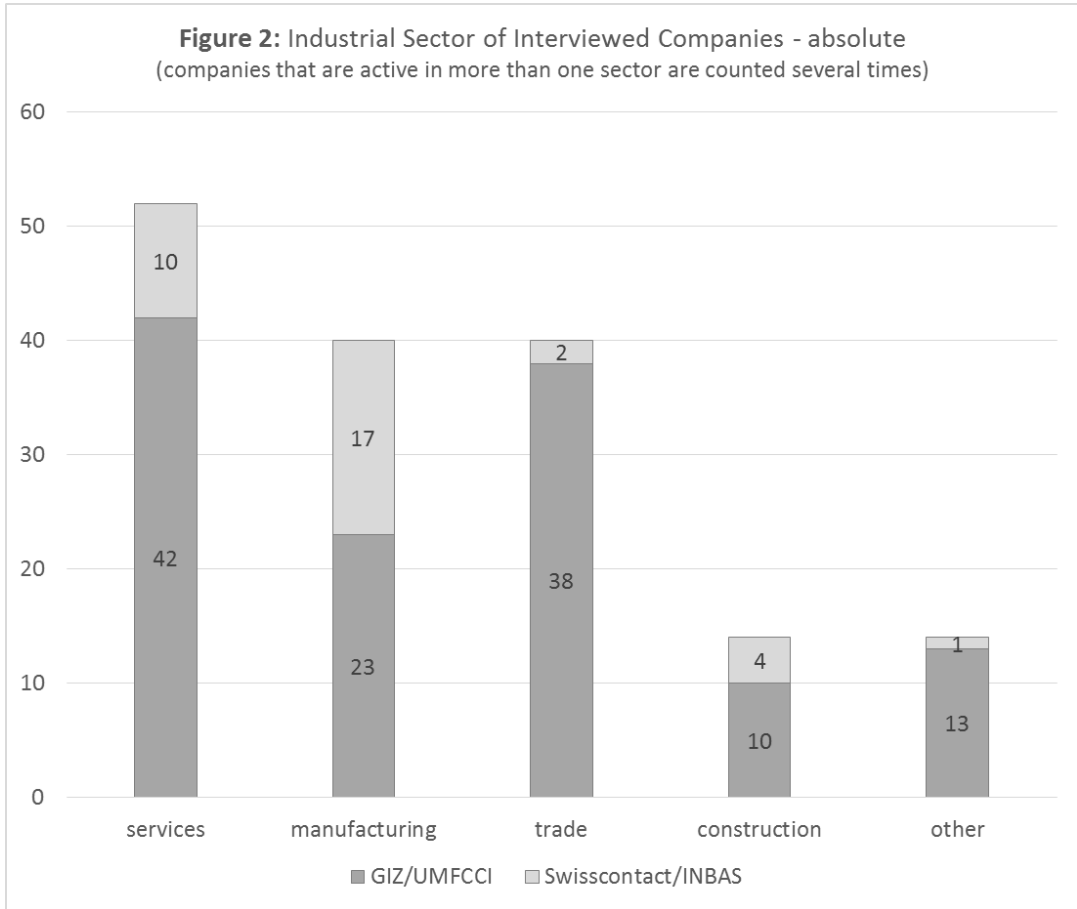
Table 2: Companies interviewed in surveys on in-company training in Myanmar

Industrial sector	GIZ/UMFCCI	Swisscontact INBAS	Total	percentage
Services	42	10	52	32.50 %
Manufacturing	23	17	40	25.00 %
Trade	38	2	40	25.00 %
Construction	10	4	14	8.75 %
Other	13	1	14	8.75 %
Total	126	34	160	100 %
Companies that are active in more than one sector are counted several times				

Table 3: Size of interviewed companies

Number of employees	GIZ/UMFCCI	Swisscontact INBAS	Total	percentage
1-50 employees	67	12	79	58.96 %
51 to 100 employees	9	7	16	11.94 %
More than 100 employees	26	13	39	29.10 %
Total	102	32	134	100 %

8 After the field studies a VSDP expert also visited and interviewed the owners of two social enterprises that conduct apprenticeship-type of company-based training: Shwe Sa Bwe restaurant and Yangon Bakehouse. Some interesting experience of these social enterprises may be used to conceptualise training for disadvantaged target groups. However, concept and objectives of social enterprises differ from the objectives of profit-oriented companies, thus, the experience of these special types of enterprises are of limited use to develop generally valid rules and regulations for Myanmar.



Involvement in apprenticeship/in-company training

The study conducted by Swisscontact/INBAS found that almost **70 % of enterprises interviewed offer initial training in one form or another**. About 45 % of these enterprises (that provide initial training), offer “structured or semi-structured initial training”, while 55 % of enterprises, offer mostly “unstructured initial on-the-job” training by pairing new employees with experienced employees.

The enterprises that offer “structured or semi-structured initial training” are mostly companies with foreign ownership or closely related to foreign enterprises, enterprises providing “higher-end” products or services (e.g. in the hospitality sector). The enterprises which offer “unstructured” initial training to new recruits are mostly companies with relatively low value addition as well as small scale enterprises or enterprises belonging to the cottage industry.

If we look at the combined results of the Swisscontact/INBAS and the GIZ/UMFCCI findings, the picture differs. Here, only about one-third of enterprises covered involve in any kind of initial training, another one-third do not provide initial training but further training to staff already employed, and more than one-third of companies do not provide any in-company training at all.⁹

Table 4: Kind of training provided by companies

Training provided	GIZ/UMFCCI	Swisscontact INBAS	Total	percentage
Any kind of initial training	21	22	43	32 %
No initial training but further training	34	8	42	31 %
No training at all	48	2	50	37 %

Forms of initial training

The Swisscontact/INBAS study shows that the most common form of initial training provided in companies is **attaching new recruits with experienced workers** (see below). This, in essence, was originally/traditionally a key feature of apprenticeship training: Observing how the master performed the job, assisting gradually, and finally doing the job under the supervision of the master.

It is interesting to note that “structured” and “unstructured” on-the-job-training combined with off-the-job classroom training is practised by 23 % of the interviewed companies (Swisscontact/INBAS sample). If we also include the VSDP related on-the-job training (i.e. training provided by the VSDP's Hotel Training Initiative also comprising off-the-job learning) in this category, about one-third of the interviewed enterprises combine work-integrated skills acquisition with related classroom teaching, another key feature of (dual) apprenticeships.

9 The figures referring to GIZ/UMFCCI are computed based on the original (raw) tables provided, depicting the respondents' answers by enterprise. These findings differ from the findings in the Feder report (p. 7), which states that only “25 companies do not provide training to new staff.”

Table 5: Forms of initial training

Forms of initial training	percentage of companies in Swisscontact/INBAS study¹⁰
Overseas training	4 %
Internship plus training on soft skills	4 %
Classroom plus overseas training	5 %
Unstructured on-the-job plus classroom training	9 %
Hosting VSDP Learners	9 %
Structured on-the-job plus classroom training	14 %
New employees work with experienced workers	55 %
Total	100 %

Although the GIZ/UMFCCI study did not ask the same question, the findings do not contradict the above information but support the tendency:

“The surveyed companies mostly provide training to new staff by senior staff and supervisors (37), followed by external training providers (13), training by internal training departments (13) and external training providers coming into the company (11). Only few companies contract former and retired staff for training of new staff (4).” (Feder, p. 6. Based on 103 companies).

The related findings of the Swisscontact/INBAS study reveal that in those enterprises that provide on-the-job training about 70 % of the training is provided by supervisors and experienced workers. External trainers/lecturers are only used by less than 20 % of the enterprises

10 The question was not included in the GIZ survey.

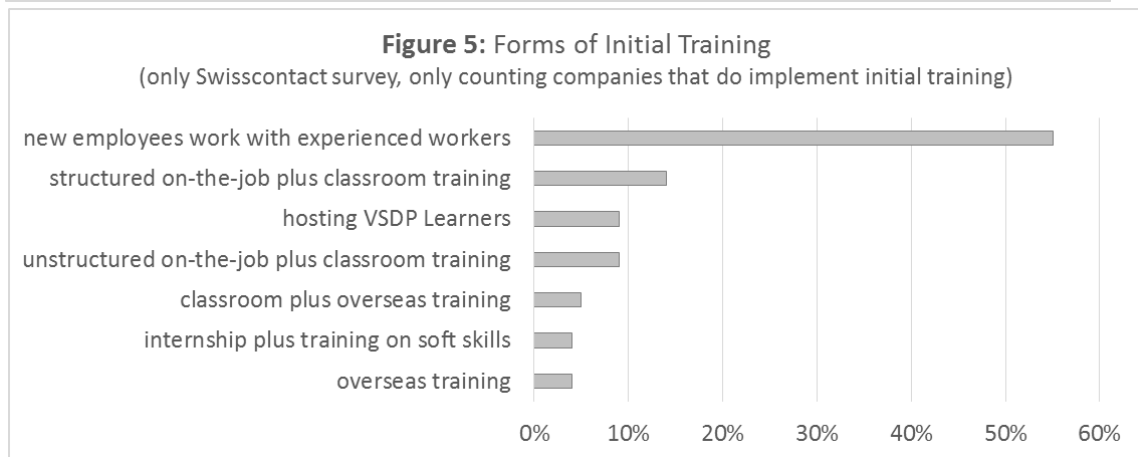
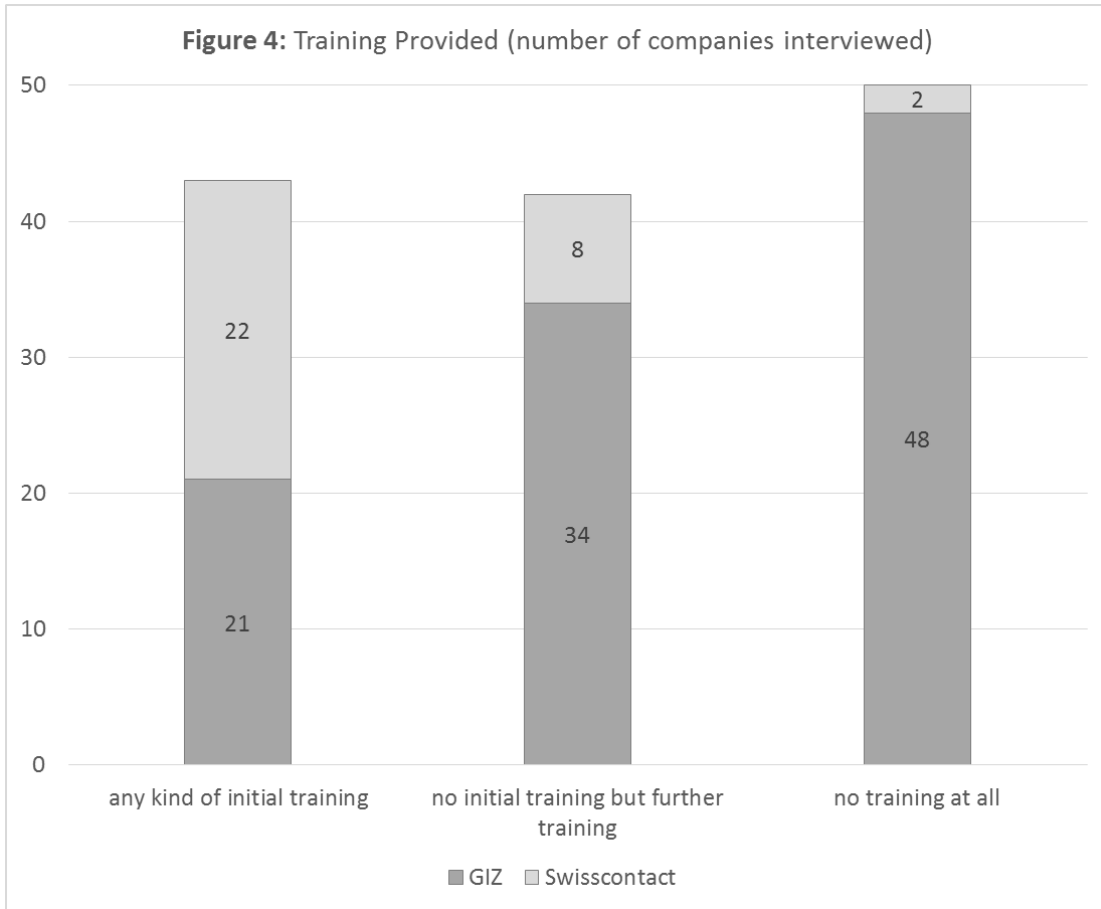


Table 6: Dual Initial Training

	GIZ/UMFCCI		Swisscontact/INBAS		total	
	%	absolute	%	absolute	%	absolute
total number of companies	100%	102	100%	32	100%	134
of which: companies that provide initial training	21%	21	69%	22	32%	43
of which: companies that combine this initial training with classroom training	76%	16	23%	5	49%	21%
companies that combine initial training with classroom training (percentage of all companies)	16%		16%		16%	

Duration of initial training

Swisscontact/INBAS and GIZ/UMFCCI findings differ with regard to the duration of in-company training. The Swisscontact/INBAS sample revealed training durations as follows:

- Companies related to foreign investment and enterprises providing “higher-end” products or services provide training that lasts between 3 months and 2 years.
- In-company training at hotels varies between 2 weeks to 7 weeks.
- Companies related to cottage industries provide training between 6 months and 3 years duration, depending on the type of job.

The GIZ/UMFCCI study reports, that “...most companies provide trainings with a duration between 1 week and 1 month. Only very few companies give long run trainings (for example 2 or 3 years)” (Feder, p. 7).

It can be concluded that in-company training lasting between 6 months and 3 years hint at a training model that could be transformed into apprenticeship training.

Other Findings

The Swisscontact/INBAS study found that less than 30 % of those companies that implement in-company training provide (training) **contracts** to their trainees, which is a key attribute of apprenticeships.

Almost 50 % of the companies that offer in-company training claim to do that based on an internal **training plan**, which can be another important feature of apprenticeships.

Asked whether the on-the-job learners were **tested** or **assessed** at the end of the training period, five companies (22 %) providing on-the job training stated that they were testing their learners by means of a written and practical test, and awarding **company-specific certificates** if trainees comply with the set (company-specific) requirements. They also received **company-specific certificates** if trainees comply with the set (company-specific) requirements. Other enterprises (about 60 % of those providing training) explained that they were assessing the trainees' performance regularly by means of observation and evaluation by the supervisors. Whenever companies collaborate with CVT trainees receive a CVT-certificate after successful completion. **Logbooks** as a means of continuous monitoring and evaluation of trainees were only used in one enterprise.

Reasons given why enterprises do not provide on-the-job training to new recruits are that these recruits would already possess the required skills (from institution based training), that the **cost** of training were too high and/or that company staff would not have the time to train (Feder, p.7). Another reason for the low percentage of companies providing apprenticeships is the high labour turn-over rate in Myanmar: Employers are reluctant to invest time and money into training if there is a high risk to lose the employee after a short time.

The Swisscontact/INBAS study also tried to get opinions of enterprises about **regulation** of in-company training by government. About a third of the respondents showed a positive attitude towards more regulation. More than half of the respondents had no opinion in this regard or gave no feedback on this question. Similarly, the respondents did not express any opinion regarding **support** to be provided by government to expand in-company training.

It was interesting to note that more than 80 % of respondents in the GIZ/UMFCCI study expressed their interest to further develop the capacity of their senior staff/supervisors (workplace trainers) to provide better in-company training (Feder, p.7). This suggest that companies realise that they need to strengthen their in-company training.

The overall impression, however, which the Swisscontact/INBAS experts reported at the end of their field work, did not inspire optimism. The reported reluctance of Myanmar employers to invest time and money in training¹¹ could be mostly confirmed. Among the older generation of workers there is still a high proportion of those with excellent technical skills but there is no mechanism in place to transfer these competencies systematically to the younger generation. Some companies meddle through with ad-hoc solutions but most do not even do that. This can be observed in many industry sectors. There is a great risk that many existing technical skills will be lost for the development of the country when the generation of currently above 50 year olds retires.

11 See section "Limitations" above.

6 Regional Experience

In an attempt to learn from the experience of other countries in developing their apprenticeship systems, a consultant assigned by Swisscontact/INBAS also looked into the development of apprenticeship training in the Asian Region. Some interesting findings of these case studies are presented hereunder.

All the countries studied (Bangladesh, India, the Philippines, South Korea, Thailand) introduced legislations on formal apprenticeship training or in-company training during the 1960s. While apprenticeship exist in selected sectors and companies, formal apprenticeship systems do not seem to have developed into mainstream systems for large-scale skills development in any of these countries.

In **India**, for example, the latest figures available at the Directorate General of Employment & Training webpage show that 28,500 enterprises train 212,000 trade apprentices and 43,000 graduate, technician and technician apprentices. Compared with about 250 million young people in the age group of 15-24 this is not a significant number. “In India apprenticeships are not generally attractive as they involve a long period of study and work, they are manufacturing-oriented, employers pay poor stipends, and the social status of the apprentice is low. The fact that there are no clear pathways for articulation into further study is also an impediment.”¹² Another important reason for the low performance of the apprenticeship system is seen in the insufficient involvement of private sector stakeholders: “There is no active participation of chambers of commerce and industry and trade unions/association in the Apprentice Training scheme. Even the involvement of the employer in the apprenticeship is feeble. They are not integrated into drafting or revising the training curricula. As a result, the training does not reflect the skill needs of industry, and in consequence the acceptance is low. Taking this into account, **the vigorous involvement of industry is a must** in order to improve the performance of Apprenticeship Training both qualitatively and quantitatively.” (ILO/World Bank, p. 106).

Another interesting case is **South Korea**. From the outset the principal skills development system was a compulsory in-company training system. It was an obligation of companies to either provide in-company training programmes to their workforce or pay training levies to a training fund. “Another important factor for the success was the parallel development of a qualification system, as stipulated by the Vocational Training Act of 1967, to increase the credibility of certificates awarded. However, due to the difficult social and economic circumstances in the early 1980s and the excessive regulation of the compulsory in-company training system many enterprises avoided this form of training and preferred to pay training levies instead. By 1986, two-thirds of enterprises obligated to provide in-company training chose to pay training levies instead ...”¹³ The in-company system in South Korea shifted towards a centre/school-based TVET system.

Since the early 1980s some countries in the region embarked on introducing “**dual apprenticeship training**” with elements of the Swiss or German approach, namely, the Philippines, Thailand and India. Despite many impacts of these project/programmes on the quality of apprenticeships training in the respective countries their quantitative outcomes as well as their impact on the system’s architecture remain moderate at best.

12 Towards a Model Apprenticeship Framework. A Comparative Analysis of National Apprenticeship Systems. International Labour Organisation, International Bank for Reconstruction and Development/The World Bank. 2013. P. 9.

13 Source: Institute for Research on Labour and Employment, UCLA - Government-led Vocational Training System and its Lessons: In case of South Korea before the IMF Economic Crisis, 2012, by Young Sun Ra; quoted in: E. Gutmann: Comparative analysis of practical case studies of apprenticeships in the region.

In **Thailand** the first initiative to introduce dual apprenticeship training goes back to the 1970s when a cement factory in cooperation with a vocational training school tried to train young people using the German Dual Vocational Training approach. The German Technical Cooperation (GTZ) supported the project. Based on the experience of dual apprenticeship training in a single enterprise the approach was rolled out in the manufacturing sector in the late 1980s. Expansion to other sectors such as commerce and services followed later. By the end of the project in 2002 over 4,000 companies and 250 colleges were jointly offering dual vocational training courses, and enrolment of students reached almost 10 % of all students enrolled in formal initial vocational education. A lesson learnt from this development was that gradual expansion from a single company to a selected economic sector before expanding to other sectors could be considered as a success strategy. Another lesson learnt was that: "A law on vocational education that provides specific regulations for DVT (Directorate of Vocational Training) is not a precondition for its introduction. In fact, it became obvious that regulations specific to a cooperative model can only be appropriately designed after experience has been gained with the cooperation. This applies particularly to the allocation of roles and tasks among the acting stakeholders."¹⁴

Another interesting approach to formalise skills acquired in informal apprenticeships through assessment in the form of RPL (recognition of prior learning) can be found in **Bangladesh**.¹⁵ In a joint initiative between the Government of Bangladesh and ILO and funding by the European Union (EU) informal apprenticeships are upgraded by training Master Crafts Persons of micro-enterprises, focusing workplace training on competency standards, complementing in-company training by off-the-job related theory instructions at training institutions, and finally providing access to formal skills testing and certification under the upcoming National Technical and Vocational Qualifications Framework (NTVQF). The approach also comprises apprenticeship contracts (working hours, pay rates, minimum age), improvement of occupational health and safety at workplaces, and logbooks to monitor and evaluate learners' performance continuously. This training, assessment and certification approach is complemented by a support structure to facilitate access to micro finance for cooperating enterprises as well as for graduating apprentices.

7 Conclusions and Way Forward

Conclusions

In summary, the combined findings of both the GIZ/UMFCCI and Swisscontact/INBAS studies in 160 firms across different economic sectors and of varying size revealed that:

- About a third of all companies provide initial work-based training in one form or another.
- Less firms but still a sizeable number combine on-the-job skills acquisition with off-the-job training (about 25 % according to the Swisscontact/INBAS study).
- Another sizeable number of firms provides further training to staff already employed. The key actors in providing in-company training are supervisors/experienced workers and other senior staff of the company.
- In-company training duration varies significantly between 1 week and 3 years.

14 GIZ online library of sustainable economic development - Part 4: Practitioners Perspectives. Peter Pozorski: Technical and Vocational Training in Thailand.

15 Rothboeck, Sandra: Case Study - Formalising skills and informal apprenticeships through assessments and Recognition of Prior Learning in Bangladesh. October 2013.

- Less than 30 % of the firms involving in on-the-job training enter (training) contracts with the trainees.
- Almost half of the enterprises interviewed reported that they use (firm-specific) training plans.
- A substantial proportion of responding firms monitor and assess trainees' performance regularly, every fifth company is assessing their learners more systematically by written and practical tests and awarding firm-specific certificates. Whenever CVT is involved in off-the-job training, they award their certificates of completion to successful trainees.
- About a third of the companies interviewed expressed a positive attitude towards more regulation of in-company training activities.

It can be generally concluded from the study findings that formal or regulated apprenticeships do not appear to be practised in the upcoming private sector of the Myanmar economy. However, in-company skills development practices are found in the enterprises comprise elements of apprenticeships, though to different degrees. These features and elements can be built upon to develop the currently practised in-company training gradually into more systematic apprenticeships over time. This can however not be done overnight and will take time and requires commitment, interest and support by both companies and the skills development sector.

Before concluding further, the status and potential opportunities of in-company training must be interpreted in the broader socio-economic context of Myanmar:

First, one has to be aware that most of the private companies in Myanmar are quite young, if not juvenile, since the privatisation of the previously government-owned and -controlled enterprises has only started some few years ago. Thus, skills development is just one challenge in an array of challenges the enterprises are facing.

Second, the primary objective of private firms is to deliver goods and services for profit. Staff development is a means to this end, and not an end in itself. More importantly it is seen as a cost. Lessons from the development of formal apprenticeship systems in industrialised countries indicate that it takes quite some time, incentives and socio-economic development of the society at large until enterprises consider the expenses spent on in-company training and especially apprenticeships as 'investments' rather than just 'cost' (awareness).

Third, for more than three years there have been many forums discussing fundamental reforms of the TVET system in Myanmar. Among these fundamental reform discussions, but not limited to them, are the intention of the Ministry of Education to enact a modernised TVET Law, the intention to establish a Myanmar Qualifications Framework as well the activities of MOLES to operationalise the ESDL (2013). All the fora around these reforms require, inter alia, extensive participation of representatives of the private sector, i.e. organised employers and employees. Participation in the many meetings conducted by these forums is becoming a burden for employers' and employee' organisations.

Technical aspects of apprenticeship training

The table defining the characteristics of regulated apprenticeships (as compared to other forms of in-company training) presented to clarify terminology used above can be used to identify possible intervention points to facilitate improvements.

Table 7: Principal attributes of apprenticeship compared to informal apprenticeship and other workplace-based arrangements

	Wage	Legislative Framework	Work-place based	Programme of Learning	Structured on-the-job training	Off-the-job training	Formal assessment	Recognised Certification	Duration
Traineeship	maybe	no	yes	no	maybe	no	no	no	variable
Internship	no	no	yes	no	maybe	no	no	no	variable
Informal Apprenticeship	Pocket money or in kind	no	yes	no	maybe	no	no	no	variable
Workplace Learning	yes	no	yes	no	maybe	no	no	no	variable
Dual Apprenticeship	yes	yes	yes	yes	yes	yes	yes	yes	fixed
General Situation in Myanmar	partially	no	mostly	yes	partially	partially	not yet	not yet	variable
CVT	paid by employer	partly	no, but the system cooperates with companies	yes	sometimes provided by Partner Companies	yes	partly	partly	3 years
social enterprises (Yangon Bakehouse, Shwe Sa Bwe etc.)	yes	no	yes	yes	yes	yes	no	no	10-11 months
further in-company training (not initial)	yes	no	yes	sometimes	on-the-job but mostly unstructured	rarely	probably no	probably no	variable (usually less than 2 weeks)

Modified table after "Overview of Apprenticeship Systems and Issues. ILO contribution to the G20 Task Force on Employment". November 2012. P. 3

The last lines of table 7 were added based on the summarised findings of the observations during the Swisscontact/INBAS stock-taking exercise.

Almost a third of the company enter contracts with their trainees, hence it is likely that they pay the trainee a wage.

The only legal framework for apprenticeships and in-company training in place in Myanmar is the ESDL (2013). But the ESDL, which still is to be made operational by rules and regulations, only states that enterprises “may carry out” different kinds of on-the-job and off-the-job training. Regarding apprenticeships the law only stipulates that enterprises may employ young people who are at least 16 years old as “apprentices” provided they are trained on employment-related skills systematically.

While most of the training provided by companies is *workplace-based*, less than half of the training provided by them is “structured” in a sense that some sort of training plan (*programme of learning*) would also be required by apprenticeships.

The most common form of initial training to new recruits in companies is done *on-the-job* by attaching learners to experienced workers. Combining on-the-job training with some sort of *off-the-job training* is also practised in Myanmar enterprises, this also being a key feature of formal apprenticeships.

While some forms of assessment and company-specific certification are found already, *formal assessment and certification* is not practised yet, certainly also because a formal (national) system of assessment and certification of skills is not yet operational on larger scale in Myanmar. However, national skills assessment and certification is currently being introduced by MOLES/NSSA. As soon as this system will be scaled up it can be used to assess and certify in-company training and thus become another important feature of an upcoming apprenticeship system.

In order to build on existing good practices and improve the situation of in-company training with a view to introduce a formal apprenticeship system one may, in principle, work on all of the characteristics at once. However, this may not be the most successful approach and may overburden the stakeholders. From a technical point of view it may be wise to focus interventions on those aspects for which the MOLES is already working with the support of GIZ and Swisscontact/INBAS and SDC (intervention points). These are:

(1) Introduction of Formal Assessment and Recognised Certification

The studies reveal that some of the companies providing in-company training conduct already company-specific skills testing. At the same time, MOLES is in the process to introduce a system of National Skills/Competency Standards, assessment and certification under the auspices of a National Skills Development Committee (“National Skills Development Authority, NSSA”) to be established by the Employment and Skills Development Law (ESDL) of 2013. In this regard, NSSA with support of GIZ and Swisscontact/INBAS/SDC has developed and piloted open-access skills assessment and certification for 11 occupations and has already assessed and certified more than 400 workers (National Skills Certificate Level 1) quite successfully.

Possible Intervention: Enterprises conducting work-based training could be motivated to gradually send their trainees to participate in NSSA’s assessment and certification if and when they are sufficiently skilled. In doing so, in-company training could become more valuable for both employees and employers and a first step to a more formalised system would be done.

(2) Training of Workplace Trainers and improving programmes of learning (structured on-the-job and off-the job learning)

More than 80 % of respondents in the GIZ/UMFCCI study expressed their interest to further develop the capacity of their senior staff/supervisors to provide better in-company training (see chapter 3 above).

Possible intervention: The GIZ/UMFCCI study on in-company training identified workplace trainers/instructors from firms who conduct already (semi-) structured in-company training as an important target group for capacity-building regarding planning and delivering of in-company training of better quality.

Part of this capacity building of workplace trainers could focus on the use of NSSA skills standards to prepare of training plans for workplace training and curricula for off-the job training. Also, as part of the Hotel Training Initiative of VSDP (Swisscontact/INBAS/SDC), company-based workplace instructors have been trained and are currently supporting selected partner hotels in training of hotel staff as well as disadvantaged young people from the labour market.

In this context the Local Vocational Training Component of the Swiss VSDP is planning the implementation of a restricted pilot course including apprenticeships with hotels in the Mon and Kayin States with a focus on increasing the capacity of existing employees/trainers in companies to upgrade their skills as well as their in-company training system.

Aspects of Legal Framework and Governance

An appropriate legal framework and an efficient governing structure are the most critical parts when introducing a formal apprenticeship system and they are closely interlinked with each other.

The ESDL provides a basic governing structure for skills development that could be used as a starting point and possibly as an interim step on the way to an apprenticeship system. Guided by a Central Employment and Skills Development Body/Committee (including non-government stakeholders), the Skills Development Body/Committee (including non-government stakeholders), hitherto referred to as NSSA, is in charge of all aspects of skills development provided by or closely related to enterprises. In-company training, apprenticeships and skills assessment and certification are included in the regulatory and supervisory mandate of the Skills Development Body. It is foreseen that the Skills Development Body will establish two committees, a Standards and Training Committee to oversee training delivery and an "Accreditation, Assessment and Certification Committee" to supervise skills assessment and certification. It is also foreseen to have Sector Committees to feed in the interests, needs and demands of the enterprises in the different sectors of the economy.

While this structure is basically suitable to govern the upcoming skills development system including apprenticeships there is a risk that representatives of government organisations will dominate the decision-making bodies of this structure, and that representatives of employers and employee organisations are underrepresented. However, "genuine employer engagement is not secured simply through employer representation on official bodies set up by government..." but rather "... needs commitment of time and resources at all levels of apprenticeship management." (ILO, opt. cit. p. 13).

The draft rules and regulations for the ESDL, which will include rules and regulations for in-company training and apprenticeship training, are still to be finalised. It may be one of the first and foremost tasks of the **Skills Development Committee (NSSA "Board")** to guide that process in close consultation with a wider range of stakeholders, and possibly with technical support by development partners. "Employers are the key to apprenticeship opportunities and the most important players in the apprenticeship arena.... Employee organizations/trade unions play an important role in helping to ensure that apprentices' rights in law are safeguarded." (ILO, opt. cit. p. 12)

The following scenario may help to facilitate the discussion between the stakeholders (employers' and employee organisations, government and civil society) to be conducted before the rules and regulation will be finalised.

Scenario 1: No regulation of training delivery - only regulating skills assessment and certification (outcomes)

Rationale:

- Enterprises in the private sector of the economy face many challenges and skills shortages is only one of them
- Enterprises know best what kind of skills they need and how to impart them in in-company training/apprenticeship
- Regulating skills assessment and certification (outcomes of training) on a voluntary basis as a means of quality assurance is sufficient (for the time being)
- Industry organisations (chambers, associations) and NSSA issue joint guidelines (instead of regulations) and provide support to enterprises on improving delivery of in-company training.

Risks:

- Legitimate rights and interests of young employees may be undermined under the pretence of "on-the-job training/apprenticeship" ("child labour")
- The skills assessment and certification system of NSSA may not be able to cope with a rapidly increasing demand for skills testing

Scenario 2: "Light" regulation of training delivery in addition to regulating skills assessment and certification (outcomes)

Rationale:

- Apprenticeship contracts between trainees and firms are made compulsory to protect the legitimate rights and interests of young employees undergoing apprenticeship and avoid misuse
- Apprenticeship contracts to include provisions on: (i) Purpose of apprenticeship; (ii) rights and duties of apprentices and firms; (iii) duration; (iv) remuneration/allowance/wage; (v) probation period; (vi) conflict resolution/appeals.
- Tentatively, provisions on a training plan that is focussing on National Skills Standards and on Assessment and Certification may be included (as a recommendations or binding?)
- Incentives and support are provided, e.g. tax reductions, grants from the Training Fund (ESDL), training of workplace trainers (by government/chambers, sector associations)
- A selective / random monitoring and inspection regime is established at (an autonomous, multi-stakeholder) NSSA and/or chambers and sector associations
- Gradual/step-wise introduction of regulatory regime and support structure by economic sector (start with one or two economic sectors, expand to other sectors based on experience).
- Development Partners support implementation in selected economic sectors (e.g. Switzerland – hotel sector, Germany – manufacturing sector, other development partners to join in: agriculture, construction, etc.).

Risks:

- Regulation of in-company skills training and apprenticeship increases companies' cost and may discourage them from offering or expanding in-house training
- Regulations require a monitoring/inspection regime to enforce them. Neither government nor industry organisations (chambers, associations) currently seem to have the capacity to monitor adherence to the regulations
- Not feasible without a competent and sufficiently staffed secretariat/technical office at a semi-autonomous NSSA
- Training Fund (ESDL) may take long to come into operation.

