

COMPULSORY CERTIFICATION REVIEW

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TO: Apprenticeship and Certification Stakeholders

On August 1, 2007, the Minister of Training, Colleges and Universities appointed me to conduct a review of the impact of expanding compulsory certification for trades that are now voluntary. I am writing to explain my task and to invite you to participate in this important work.

I am attaching three documents:

- A Statement of Work
- A backgrounder on apprenticeship and trade certification, and
- A summary of the arguments advanced in the past, for and against increasing the number of compulsory trades.

As you will see from the Statement of Work, my mandate is to consider how expanding compulsory certification to trades that are now voluntary would impact the following five factors: health and safety, the registration of new apprentices, the number of apprentices who would complete trades training, consumer protection, costs and the effect on the economy generally. It is important to emphasize that the review will not include making recommendations for government action with respect to existing requests for compulsory certification.

The weeks since my appointment have been devoted primarily to briefings and research relating not only to the apprenticeship system in Ontario, but also to comparable systems in other jurisdictions. I have also met with a relatively small number of groups and individuals who have expressed their wish to make preliminary representations. Meetings have also been held with economists from the Labour and Demographic Analysis Branch of the Ministry of Finance and the Labour Market Information and Research Branch of the Ministry of Training, Colleges and Universities, with a view to determining whether data exist that might assist whether, and to what extent, compulsory versus voluntary certification relates to the five impact factors that I have been instructed to consider.

I urge you to participate in this review. As a first step, I invite you to submit your written submissions concerning the effect of expanding compulsory certification on each of the five factors mentioned above.

It may be that you and/or your organization have already studied this issue. If so, I would appreciate receiving any survey or other research material which are you able to share with me. Your impressions are also welcome, but supporting research will undoubtedly carry greater weight in terms of the future policy development process.

Would you please send your written submissions to me by January 25, 2008, to:

Tim Armstrong
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or by email to: compulsory.certification@ontario.ca

I look forward to receiving your submissions. During the course of the review, I will also be arranging meetings with stakeholders from across Ontario. Particulars of those meetings will be provided to you in due course.

Thank you for your interest and support.

Sincerely,

A handwritten signature in black ink, appearing to be 'Tim Armstrong', with a long horizontal flourish extending to the right.

Tim Armstrong
Compulsory Certification Advisor

Attachments

Attachments are also available on the Ministry's website:
www.edu.gov.on.ca/eng/ccr/ and www.edu.gov.on.ca/fre/eao/

ONTARIO'S APPRENTICESHIP AND CERTIFICATION SYSTEM

BACKGROUND PAPER

Prepared for the Compulsory Certification Review

INTRODUCTION

Apprenticeship is an effective form of training used around the world to address the needs of employers in many different kinds of industries. It is a method of learning in which practising experts (journeypersons) pass on knowledge and skills to apprentices in a workplace setting. In Canada, apprenticeship is one of the few ways workplace training is recognized and credentialed, thus enhancing worker mobility. Most training takes place on the job; the theoretical training is delivered by institutions such as community colleges (colleges of applied arts and technology) and union and/or employer-sponsored training centres.

By helping build a skilled labour force, apprenticeship training enables the province to attract the investment it needs for economic growth and job creation. Employers, while covering most of the costs of training, have productive employees in the workplace, and workers earn wages while they learn relevant skills required in real workplaces.

The purpose of this background paper is to provide background on compulsory certification including the history of apprenticeship and trade certification in Ontario and an overview of the apprenticeship and certification system today.

COMPULSORY CERTIFICATION – BEGINNINGS

Compulsory certification means that a person must hold a valid certificate of qualification or be registered as an apprentice in a given trade to work or be employed in that trade. Conversely, voluntary certification means that a person does not have to hold a certificate of qualification or be a registered apprentice in order to work or be employed in the trade.

In 1944, at the request of management and labour representatives in the automotive repair industry, compulsory certification was introduced for the trade of motor vehicle repairer, to protect the public from the consequences of faulty work. In 1958, compulsory certification was introduced for the trade of hairdresser and, in 1963, for the trade of barber.

In 1964–65, following a report of the Select Committee of the Legislature on Manpower Training, specific construction apprenticeship trades were designated compulsory.

The only compulsory certified trade introduced since the 1960s is hoisting engineer (crane operator), which was introduced in 1982. Prior to 1982, hoisting engineer was a compulsory certified trade under the *Operating Engineers Act*. Today there are 21 compulsory/restricted trades. See Appendix 1 for a list of compulsory trades.

ONTARIO APPRENTICESHIP ACT (1928)

This Act reflected the Ontario government's desire to increase the training of Ontario workers, primarily in the building trades, and to legislate their training and working conditions. It applied only to minors between the ages of 16 and 21.

APPRENTICESHIP AND TRADESMEN'S QUALIFICATION ACT (1964), renamed TRADES QUALIFICATION AND APPRENTICESHIP ACT (1990)

Background to the Act

In spite of the *Ontario Apprenticeship Act*, throughout the 1930s, 1940s and 1950s the apprenticeship system lost popularity and effectiveness in Ontario. An examination of the apprenticeship system in Ontario in 1961 found that it was not being successfully utilized as a means of training tradespeople. Because of concerns raised by those who wanted better trades training, particularly in the construction industry, in 1962 a Select Committee on Manpower Training was appointed by the Ontario Legislature. The committee was established to study apprenticeship and related training systems, together with the roles of government, industry, and labour in this area, and make recommendations about the training of workers, including all aspects of apprenticeship training.

In February 1963 the committee submitted its report. The following year, recommendations of the select committee were adopted in a new *Apprenticeship and Tradesmen's Qualification Act* (ATQA), which replaced the *Ontario Apprenticeship Act*. Also, the government continued to support technical education: in 1965, the Legislature passed a bill amending the *Department of Education Act* to create a system of community colleges (colleges of applied arts and technology) in Ontario.

The ATQA introduced major changes including designating specific construction apprenticeship trades as compulsory to stimulate participation by giving those trades the increased credibility that came with compulsory certification.

The Select Committee on Manpower Training had also encouraged the government to apply the apprenticeship training system to manufacturing occupations. In the 1970s, reflecting the growth of Ontario's manufacturing-based economy, the industrial/manufacturing trades began to use the apprenticeship model of training.

Name change

In 1990 the name of the Act was changed to the *Trades Qualification and Apprenticeship Act* (TQAA). Its provisions remained unchanged. The TQAA still governs apprenticeship in Ontario today along with the *Apprenticeship and Certification Act, 1998* (ACA).

APPRENTICESHIP AND CERTIFICATION ACT, 1998 (ACA)

Background to the Act

In December 1996 the government launched a broad consultation process on apprenticeship reform. Stakeholders were invited to contribute to helping the government meet its goal of "a strong apprenticeship system to promote economic growth and to address the training needs of Ontario industries."

The then Ministry of Education and Training held consultation meetings with stakeholders. A survey of approximately 1,200 active apprentices, former apprentices, and certified tradespeople was conducted to identify client service satisfaction levels and to solicit these clients' views on such reform issues as funding, quality of training, and client service delivery.

During the consultations, stakeholders spoke about the strength of the apprenticeship system and model of training, while acknowledging that the system could be improved in many ways. There was agreement that the broad goals of reform should be to clarify the intent of the legislation and regulations, to ensure that they promote both high standards and consistency in applying the standards, and to encourage a greater sense of ownership by stakeholders.

The construction trades generally did not support the changes to the legislation and urged the retention of the TQAA. Concern was expressed that the new Act did not recognize or accommodate the construction sector's unique needs. Other presenters viewed the streamlining of the existing legislation as unnecessary deregulation that would weaken the system and erode the trades. Some groups wanted industry to have more opportunity for input into the system. The Ministry also heard concern that the introduction of "skill set certification"—that is, certification based on a set of skills—would result in fragmentation of trades. Many groups expressed the fear that skill sets would reduce worker mobility by being too employer-specific.

After the consultations and public hearings on the legislation, the ACA received royal assent in 1998 and was proclaimed in 2000. The TQAA continues to apply to specific construction trades that are named in this Act or its General Regulation.

Restricted Skill Sets

The ACA provides that not every skill used in every trade requires a compulsory Certificate of Qualification. Legislation permits the issuing of a certificate (other than a Certificate of Qualification) for completion of training in a "skill set," which is a specified skill or set of skills required for a trade or occupation. The term "skill set" is defined in the ACA as "one or more skills." Under the TQAA, only *trades* can be designated as "certified" (requiring compulsory certification); the ACA allows *skill sets* to be designated as "restricted" (requiring compulsory certification).

Skill sets enable industry to develop, and government to certify, levels or areas within a trade or occupation. An example is the mandatory certification for workers who install wheels and rims on large trucks. People who wish to be certified for this work, or as a truck and coach service technician, must now prove they have the set of skills needed to perform such installations.

The ACA also allows for the overlapping of restricted skill sets, meaning that a particular skill set can fall within more than one restricted skill set, trade, or occupation. Under the ACA, a restricted skill set will always be "restricted" (compulsory), regardless of the work context within which the skill is used.

TRADE DESIGNATION

The TQAA establishes that once a trade is designated under the Act, no one, other than an apprentice, can work in that trade unless he or she holds a proper certificate; that is, a Certificate of Qualification. Trades designated under the Act are referred to as "compulsory" trades; that is, it is compulsory to hold a certificate, unless one was an apprentice, to practise that trade. An

exemption from compulsory certification allows for voluntary certification. This process was introduced in 1964. There are 10 TQAA compulsory trades.

Under the ACA, the Director of Apprenticeship has the authority to designate trades or occupations. Restricted skill sets are designated in regulation. There are 11 ACA restricted/compulsory trades and 1 skill set program.

No criteria are stated or defined in either statute or in operational policy, for determining whether a trade should be designated compulsory or voluntary.

CERTIFICATION

Under the TQAA, when apprentices complete the terms of their program and successfully pass the certification examination with a mark of 70 per cent or better, they are awarded both a Certificate of Apprenticeship and a Certificate of Qualification. The Certificate of Apprenticeship signals the successful completion of the apprenticeship training components, while the Certificate of Qualification is awarded once the examination is passed.

Under the ACA, apprentices receive a Certificate of Apprenticeship upon completion of their apprenticeship training program. The Certificate of Qualification is issued upon successful completion of the certification examination.

Under the TQAA and ACA, journeypersons who have been working in the trades and tradespeople from other jurisdictions who can provide documented proof of comparable work experience and training can apply directly for certification without completing an Ontario apprenticeship program. If their work experience is deemed equivalent they are eligible to write the examination for certification. The pass mark is 70 per cent.

APPRENTICESHIP IN ONTARIO TODAY

Overview

Apprenticeship training in Ontario is a partnership among many players, including the following:

- *Apprentices*, who make a commitment to train in a specific apprenticeship occupation
- *Individual employers*, who provide on-the-job training to the apprentice
- *Business and labour representatives*, who work with the government through the Provincial Advisory Committees and Industry Committees to develop training standards and examinations
- *Colleges of applied arts and technology* and other trainers, such as *union-employer training centres*, which deliver in-school training
- The *provincial government*, which sets the legislative framework and program standards, develops curriculum standards for the in-school or theoretical component of apprenticeship programs, develops and administers examinations and the certification process, administers the system through the Ministry of Training, Colleges and Universities and its network of field offices, provides funding for in-school training, and enforces the compulsory/restricted certification requirements
- The *federal government*, which contributes to the cost of in-school training for those apprentices who are eligible under the federal government's employment insurance program, and which provides income support for eligible apprentices while in school.

At present, Ontario has more than 140 apprenticeship trades in the construction, motive power, industrial, and service sectors. Of these trades, 21 are compulsory. These 21 are in the construction and motive power sectors and the hairstyling trade from the service sector.

Deleted:

An average of 10,200 new Certificates of Qualification have been issued annually over the past five years.

2005-06 activity:

- Over 70,000 registered apprentices
- 66 training delivery agents provided in-school training (24 colleges, 42 union or employer-sponsored training centres)
- Estimated 29,000 apprentices received in-school training
- More than 21,000 new apprenticeship registrations
- Estimated 697,400 journeypersons
- Estimated 27,300 active employers

Investment: Employers/Industry

Employers cover 75–90 per cent of the cost of providing program content through the on-the-job component, including the cost of journeypersons' time when they are training apprentices. They also bear the costs of relatively low productivity during the early stages of on-the-job learning and while apprentices attend in-school training. Some employers also top up income support for apprentices while they are attending school. Employer and employee representatives also contribute expertise and time and incur expenses when they help develop standards and examinations, participate on Advisory Committees and participate in promotion activities.

Investment: Government

The Ontario government funds the purchase of in-school training for apprentices and a standard per diem rate is used to determine the cost of programs. The federal government provides income support to employment-insurance-eligible apprentices.

The Ontario government provides funding to apprentices to offset the cost of purchasing tools and equipment. The program offers new apprentices loans to support their investment in the tools and equipment required to perform the trade in which they are registered.

The Ontario government funds the overall administration of the system and supports it with a network of field offices across the province. The offices provide a variety of client services, including the following:

- Employer-centred services, including assessing employer training needs; developing and helping to implement apprenticeship training programs, and monitoring apprentice contracts
- Client services, including registering apprentice contracts; delivering examinations; scheduling and following up on the in-school component of programs; providing assessment of qualifications, and processing renewal applications for journeypersons who hold certificates of qualification in compulsory trades
- Program-enhancement services, such as promoting and marketing apprenticeship programs; monitoring on-the-job training; acting as a third-party advocate for clients, and including providing individual counselling.

The province collects administrative fees for registration, examination, and certification services to offset some of the costs of these services.

There are several special apprenticeship initiatives which support program entry, training and capacity building: Ontario Youth Apprenticeship Program, Pre-Apprenticeship Training Program, Co-op Diploma Apprenticeship Program, Apprenticeship Training Tax Credit, Sector Initiatives Fund, Apprenticeship Scholarship and Employer Signing Bonus, Apprenticeship Innovation Fund, Skills Training Infrastructure Program, Employer Recognition Awards.

Investment: Apprentices

Classroom fees were introduced in 2002 – a fee of \$10 per six-hour unit of training (in-school) is payable by apprentices. The fee is \$400 for a typical 8 week period of training. Apprentices also incur some expenses related to attending school, including the loss of wages (in some cases this loss is offset by employment insurance benefits). Apprentices may also be required to purchase tools and equipment, and in some cases materials, in order to practise their skills.

COMPULSORY CERTIFICATION REVIEW

An adequate supply of skilled workers is vital to Ontario's competitiveness and its ability to attract foreign investment. The demand for and supply of skilled workers is influenced by a wide range of factors including technological innovation in the workplace, the rate of economic growth, and changing demographics such as the aging of the workforce.

On May 16, 2007, the Minister of Training, Colleges and Universities announced its intent to review the impact of expanding compulsory certification. The Compulsory Certification Review will contribute to ensuring Ontario's apprenticeship system continues to meet proper safety standards, provides value to consumers, and serves the needs of our growing economy. The review will deliberate the question: should more trades be made compulsory? What are the issues and considerations?

The review will focus on the impact of expanding compulsory certification with references to the following five factors: health and safety, the registration of new apprentices, the number of apprentices who complete trades training, consumer protection, and economic impact. The review will not comment on existing industry requests for compulsory certification.

A report will be submitted to the Minister by early 2008.

APPENDIX 1: LIST OF COMPULSORY TRADES

Total of 21 Compulsory/Restricted Trades

Trades Qualification and Apprenticeship Act: 10 compulsory trades

1. Electrician: Construction and Maintenance
2. Electrician: Domestic and Rural
3. Hoisting Engineer: Mobile Crane Operator Branch 1
4. Hoisting Engineer: Mobile Crane Operator Branch 2
5. Hoisting Engineer: Tower Crane Operator
6. Plumber
7. Refrigeration and Air Conditioning Systems Mechanic
8. Residential Air Conditioning Systems Mechanic
9. Sheet Metal Worker
10. Steamfitter

Apprenticeship and Certification Act, 1998: 11 Restricted Trades

1. Alignment and Brakes Technician
2. Auto Body and Collision Damage Repairer Branch 1
3. Auto Body Repairer Branch 2
4. Automotive Electronic Accessory Technician
5. Automotive Service Technician
6. Fuel and Electrical Systems Technician
7. Hairstylist
8. Motorcycle Technician
9. Transmission Technician
10. Truck and Coach Technician
11. Truck Trailer Service Technician

Review of the Impact of Expanding Compulsory Certification to Voluntary Trades

STATEMENT OF WORK

Background

The Government of Ontario wants to ensure that Ontario's apprenticeship and certification system continues to meet proper safety standards, provides value to consumers and serves the needs of the province's growing economy. To support this objective, the government has committed to review whether compulsory certification should be expanded to include trades for which certification is presently voluntary.

Tim Armstrong (the "Advisor") has been appointed by the Minister of Training, Colleges and Universities (Minister) pursuant to subsection 2(2) of the *Ministry of Training, Colleges and Universities Act*, R.S.O. 1990, c. M.19.

Objectives

The mandate of the Advisor is to review the impact of expanding compulsory certification to trades that are voluntary and to submit a report to the Minister with his findings and recommendations on this issue. The review and the report must take into account the following factors:

- i. Health and safety
- ii. The registration of new apprentices
- iii. The number of apprentices who complete apprenticeship training
- iv. Consumer protection
- v. Economic impact, and
- vi. Any other factor(s) that the Advisor considers relevant to achieve the objectives.

Expected Outcome

The expected outcome of the review is a written report, to be submitted to the Minister within six months of the appointment of the Advisor, which fully addresses the stated objectives of the review and includes the following:

1. An impact analysis of expanding compulsory certification with reference to the factors listed above.
2. A decision framework, including recommendations and rationales, to facilitate a decision-making process regarding expanding compulsory certification to individual trades seeking compulsory certification. The framework may include

recommendations on criteria that may be used to assess a request for compulsory certification. The benefits and risks associated with implementing the recommendations are also to be assessed in the report.

The objectives and expected outcome do not include making recommendations for government action in respect of existing industry requests for compulsory certification.

All work (including research) produced by the Advisor relating to the objectives and expected outcome will be owned by the Crown in right of Ontario.

Term

The appointment is from August 1, 2007 to the earlier of the completion of the outcomes or six months from the date of appointment.

COMPULSORY CERTIFICATION PROS AND CONS

This summary covers arguments advanced in the past for and against increasing the number of compulsory trades. Arguments illustrate the complexity of the issue. There is no guarantee of advantage in the absence of effective enforcement.

1. Health and Safety

Preamble: In developing apprenticeship and certification standards for specific trades and occupations, the Ministry of Training, Colleges and Universities by design includes training to health and safety standards. The Ministry of Labour administers the *Occupational Health and Safety Act* under which worker health and safety requirements are set out. How will expanding compulsory certification for trades that are voluntary affect health and safety?

Pros	Cons
<ul style="list-style-type: none"> • Enhances worker safety • Inadequately trained workers are frequently the cause of substandard production / construction (notably “disaster” situations) 	<ul style="list-style-type: none"> • Limits competition to the detriment of health and safety • Safety and competency can be adequately achieved in-house by supervisor, engineers and owners, without government intervention

2. Registration of New Apprentices

Preamble: For the past several years, the Ministry of Training, Colleges and Universities has set targets to increase registrations. This has been achieved through a variety of means, including establishing new apprenticeship trades and occupations. How will expanding compulsory certification for trades that are voluntary affect the registration of new apprentices?

Pros	Cons
<ul style="list-style-type: none"> • Enhances attraction for worker entrants • Increases the number of apprentices, as work may only be performed by a certified worker or registered apprentice • Stimulates training 	<ul style="list-style-type: none"> • Artificially limits entry through restrictive ratios • Other factors such as commitment to training and market forces influence registration rather than compulsory certification • Unnecessary regulatory requirement

3. The Number of Apprentices Who Complete Trades Training

Preamble: There appears to be a shift to or equal focus on completions and registrations. How will expanding compulsory certification for trades that are voluntary affect the number of apprentices who complete trades training?

Pros	Cons
<ul style="list-style-type: none"> • Compulsory trades, properly enforced, require completion and discourage abuse by employers who curtail completion to maintain advantage of low wage apprentices • The Certificate of Qualification is a mark of excellence 	<ul style="list-style-type: none"> • Improved completions are a result of other factors including commitment to training and market forces rather than compulsory certification

4. Consumer Protection

Preamble: According to the government’s website, it is the goal of the Ministry of Government and Consumer Services to promote a fair, safe and informed marketplace — one in which consumer rights are fully protected. Legislation protects these rights by setting out ground rules covering most consumer transactions. How will expanding compulsory certification for trades that are voluntary affect consumer protection?

Pros	Cons
<ul style="list-style-type: none"> • Improves public/consumer safety and satisfaction • Leads to greater “quality” construction and products • Protects public from results of dangerous incompetence • Levels the playing field and prevents unfair, unqualified competition, benefiting industry, labour and consumers alike • Inadequately trained workers are frequently the cause of substandard production/construction (notably “disaster” situations) 	<ul style="list-style-type: none"> • Limits competition to the detriment of consumer protection • Public/consumer interests adequately protected by <ul style="list-style-type: none"> ○ sophisticated purchasers ○ building codes and special regulations ○ warranties ○ supervision ○ competitive pressures to maintain “good business reputation”

5. Economic Impact

Preamble: What is the economic impact of expanding compulsory certification to trades that are voluntary?

Pros	Cons
<p><u>Labour Supply</u></p> <ul style="list-style-type: none"> Increases labour supply and enhances mobility 	<ul style="list-style-type: none"> Automatically limits supply of labour, with negative effects, especially in tight labour market. Generally inefficient means of allocating labour; restricts mobility (in situations where only partial skills required)
<p><u>Cost</u></p> <ul style="list-style-type: none"> Results in lower liability for employers – less litigation, fewer customer complaints, lower insurance premiums, etc. Provides justifiably higher wages and greater job security Provides reduced, graduated labour costs during apprenticeship periods Fairly compensates labour for requisite skills Results in reduction of underground economy activity (assuming effective enforcement) Promotes asset preservation i.e. capital maintenance 	<ul style="list-style-type: none"> Raises aggregate labour costs Favours organized labour with attendant upward labour costs (wages and benefits) With upward costs, impacts ability to compete in domestic and international markets (principally applicable to manufacturers) Involves costly, logistically difficult enforcement Increases cost to government
<p><u>Competitiveness</u></p> <ul style="list-style-type: none"> Enhances business reputations as a result of improved competence and efficiency Ensures adequate on-the-job training through appropriate ratios and in-class instruction With expertly staffed, carefully monitored training centres, provides greater prospects for superior initial training and for keeping up with advances in trades technologies 	<ul style="list-style-type: none"> Limits competition to the detriment of health, safety and consumer protection Limits flexibility to needs of new economy Intra-provincial compulsory trades regimen may limit inter-provincial mobility Favours organized labour e.g. labour supply/control, jurisdictional preservation, work opportunities
<p><u>Underground Economy</u></p> <ul style="list-style-type: none"> Results in reduction of underground economy activity (assuming effective enforcement) Levels the playing field for employers who have provisions similar to compulsory 	<ul style="list-style-type: none"> Compulsory certification, while it may level playing field, gives unwarranted advantage to otherwise inefficient firms and also increases costs to consumers Tends to increase activity in underground

Pros	Cons
certification in their collective agreements <ul style="list-style-type: none"> Levels the playing field and prevents unfair, unqualified competition, benefiting industry, labour and consumers alike 	economy (i.e., avoidance of compulsory certification)

6. Miscellaneous Ramifications – Whole Trade and Skill Sets

Pros	Cons
<u>Whole Trade</u> <ul style="list-style-type: none"> Homogenous workforce of broadly-based skills means higher performing economy than mix of skills from low to high, narrow to broad Skill-set, partially-trained craft workers frequently do not understand the impact of their work on the totality of the job or undertaking By avoiding semi-skilled specialties within trades, provides better and more stable career prospects Prevents cross-trade, multi-skilling Preserves justifiable pride in craft by tradespersons Provides greater measure of career security Increases general skill level of overall workforce, ensures better product and service quality <u>Skill Set</u> <ul style="list-style-type: none"> Skill sets provide more flexibility for employers faced with frequently changing work requirements Permits flexible response to range of varying and often unpredictable assignment needs Reduces incidence of jurisdictional conflict 	<ul style="list-style-type: none"> Rigid trade boundaries hamper flexible work practices Give rise to jurisdictional conflicts in “overlapping” areas. Difficulty defining the boundaries of compulsory trades, with jurisdictional disputes on the periphery Fails to meet the needs of niche, specialized employers where modular training is appropriate and sufficient Precludes the strategic introduction of intermediate, modular and skill-set training Restricts mobility (in situations where only partial skills required) Some tasks within compulsory “trade” do not require all competencies and may be more efficiently handled by “helpers” Prevents rapid response to meet changes in manufacturing and construction technology <ul style="list-style-type: none"> Restricts mobility Creates partially-skilled specialties within trades, restricts career prospects Impedes potential merger of craft unions