

Apprenticeship Code of Practice for Employers and Apprentices

Webinar Q&A – 13th October 2026

The following questions were submitted during the webinar on the updated Apprenticeship Code of Practice for Employers and Apprentices.

Accessing and sharing the Code of Practice

1. Where can I access the revised Code of Practice, as well as the webinar slides and recording?

The 2026 version of the Apprenticeship Code of Practice for Employers and Apprentices can be accessed using this link:

<https://www.solas.ie/f/70398/x/95bfccc618/apprenticeshipcodeofpractice.pdf>. The Apprenticeship Code of Practice webinar slides and recording can be accessed using this link: <https://apprenticeship.ie/news-events/news/updated-code-of-practice-for-employers-and-apprentices>.

2. Does this new code of practice need to be shared with all current apprentices?

The SOLAS communication regarding the Code of Practice publication and associated webinar was sent as a text message to all registered Apprentices. In addition, Employers are encouraged to bring this new Code of Practice to the attention of all their Apprentices.

Employer approval, registration and communications

3. I have employers who participate in our programmes biannually. I would ask that you revisit your 18-month SOLAS Approval decisions. The apprenticeship, as the code states, must be minimum of 2 years - could you align your re-approval with this? I find that if I have presently employers who participate biannually, and then they are faced each returning year with a revision of their status will not help retention with employers.

To clarify, the Code of Practice states that "Approval to train Apprentices may lapse where an Employer has no active registered apprentices for a period of more than 18 months". The 18 month period does not begin until the Employer's last Apprentice has completed their apprenticeship, therefore it will not negatively affect Employers who participate biannually.

4. Can you please copy the employer contact in on emails/calls to Apprentices as these notifications are not always communicated on by the Apprentices?

The SOLAS communication regarding the Code of Practice publication and associated webinar was sent as a text message to all registered Employers and Apprentices. If you did not receive this text message, please check that your contact details are correct by contacting your Authorised Officer

or your local ETB. The Code of Practice communication was sent to all other apprenticeship stakeholders via email.

5. I'm the Programme Coordinator for the Civil Engineering Apprenticeship Programme here in ATU Galway. There have been delays with registration of apprentices which causes a knock-on delay with the ATU registration. Is there any way Solas can increase their staffing during August to deal with this issue? Alternatively, is there any proposal to omit the need for the AO to visit each apprentice in their workplace in order to complete the registration process? With the rise in consortium-led apprenticeships, surely it makes sense to have the registration process completely online and omit the visit element.

The registration process must include the Authorised Officer visit to complete the suitability to train criteria, which are statutory elements.

SOLAS Authorised Officers play an essential bridging role between enterprise and education partners. Their responsibilities include implementing statutory elements of the apprenticeship system, such as approving employers to take on apprentices, managing apprentice registrations, maintaining the National Register of Apprentices, supporting apprentice welfare during training, and monitoring on-the-job training quality.

6. Can the registration date of an apprentice who was registered 2 months after the start date in 2025 be changed to the actual start date? If not, does minimum wages legislation apply for the first 2 months when the employee was not registered?

Apprenticeship registration dates cannot be backdated to line up with employer recruitment and employment start dates.

Apprentices must be registered within 2 weeks of commencing employment. Only SOLAS registered apprentices (at the point of registration) are exempt from the minimum wage act.

Employers must comply with the minimum wage legislation when employing a person before they are registered as an apprentice.

7. Page 10 - Database of Employers - Is the NAO going to advise all existing employers that they will not be placed on this database? Also, has the employer an option to opt out of this database?

The employer database already exists on apprenticeship.ie and is not a new initiative. The SOLAS data protection notice that is signed by employers as part of the suitability to train process provides the basis for sharing this information.

Employment, training and workplace experience

8. The updated Code removes the previous express prohibition on subcontracting, but that sentence does not appear in the updated Code of Practice.

The Code of Practice focuses on statutory requirements, with operational guidance available from the designated Authorised Officer.

Section 3 (Employment entitlements) states: 'During the apprenticeship, the Apprentice will remain an employee of the Employer.....'

Section 4 (Employer Obligations) has a link to the operational approval process. Within this employer approval process link the type of employment allowed is clearly defined. ([Generation Apprenticeship](#)).

9. Why are employers being allowed "loan" apprentices in situations which they cannot fulfil curriculum? Why are they being approved if they cannot deliver the full apprenticeship programme? This will lead to abuse of apprentices and "farming" of labour especially in sectors where sub-contract labour is used.

This is not a change under the new Code of Practice and existed under the previous Code. The updated version provides greater clarification only.

Employers are expected to provide the full range of experience to the Apprentice. Where an employer needs support to provide experience for a particular assessment or curriculum item, clarifications have been provided on how approved short term experience can be provided by another SOLAS approved employer. This process will need prior approval from the SOLAS Authorised Officer (Section 4h). This mechanism is to aid Apprentice progression where an Employer may not have the ability to provide a specific type of exposure at a given point in time to the Apprentice who needs it.

10. Page 9 - NB - Working Hours - Please confirm what hours daily an apprentice works in a Consortia led programme. These programmes differ as the apprentice may be working into the evening or night depending on the sector. However, please confirm what are the hours the apprentice works as the apprentice has to be protected from this aspect & their wellbeing is it still 5 days & 7.8 hours.

For Consortia-led Apprenticeships a typical training week may differ, but the total hours remain the same; contact the Coordinating Provider for further information.

11. Do you have any current benchmark salary data for apprentices? Eg do employers offer incentives such as incremental salary increases as the apprentice progresses through the course? I'm particularly interested in Dublin metropolitan data.

SOLAS does not have this data. Employer/employee contracts including agreed rates of pay, increment timings, salary increment qualifying criteria and incentives are all outside of the SOLAS remit. The published training allowance rates for craft apprentices are the guaranteed allowance rates during off-the-job training. These can be found on the apprenticeship.ie website.

12. If an apprentice is to re-sit an exam, and would like to attend refresher courses, do they need to use paid time off for those days?

Where preparation for a repeat involves a decision to pursue additional tuition in the form of grinds that are held during employment hours, your employer may support special leave requests such as study leave to help you prepare for a repeat.

There is no expectation on employers to facilitate these requests and depending on the terms of employment and discretion of your employer, you may need to take annual leave in some instances.

Employers are expected to release apprentices for inductions and all off-the-job apprenticeship training phases. There should be no reduction in wages or an expectation that apprentices should take leave or make up time for attending an induction or off-the-job training phases.

Assessment and programme requirements

13. Will non-attendance for a craft apprenticeship exam without an authorised deferral being agreed, count as an attempt?

Yes, Apprentices are required to contact providers to notify them of a planned or unplanned absence. Apprentices who do not communicate with the training provider are recorded as 'absent' from the assessment event. Apprentice assessment results that are returned with a recorded result of 'absent' will be counted as an attempt.

14. On the "Declaration of apprentice current employment status form" it says it is for official use, does that even apply for aircraft mechanics and is it compulsory?

We're not sure if the 'declaration' reference is to the registration form, change of employer or other form. SOLAS forms and official documentation apply to all apprentices.

Specifically for the craft of Aircraft Mechanics, this is one of the 25 crafts and falls under the same craft apprenticeship rules as all other craft programmes. SOLAS is the coordinating provider, and the programme leads to a National Craft Certificate at level 6 on the National Qualifications Framework (NFQ).

Health and safety

15. Page 9 - Health & Safety Point - should include if an employer is upskilling an existing employee who may already received an Induction on Health & Safety, then this employer may need to further update the apprentice as they may now be using different equipment, etc. relevant to the programme that they are now registering.

Under the legislation, the employer has a duty to provide health and safety training to all employees including apprentices. If an existing employee becomes registered as an apprentice, the employer is responsible for providing any relevant health and safety information and training that is relevant to the role and type of work the person is now undertaking as an apprentice.

Complaints, sanctions and appeals

16. Is there an avenue for raising a breach of the Code of Practice by an employer? Is it contained in the manual?

The complaints procedure is covered in Section 9f of the revised Code of Practice. Section 7 details Employer sanctions and Section 14 details Apprentice Sanctions.

17. Page 14 - Can an apprentice on a Consortia-led programme lodge a complaint with SOLAS. The apprentice may feel if they lodge it with the Consortia or college, there may be repercussions.

Yes, an apprentice on a consortia-led apprenticeship programme may lodge a complaint with SOLAS. The complaints procedure is covered in Section 9f of the revised Code of Practice. This, in turn, links to further information about the SOLAS Complaints Procedure including reference to the confidentiality of the process.

In instances where an apprentice believes that wrongdoing may have occurred, and they believe they may be penalised for reporting the wrongdoing, they can use the SOLAS external channel for Protected Disclosures – see [Solas | Protected Disclosures](#).

18. The Code of Practice refers to procedures where possible outcomes of sanction or even termination by SOLAS are suggested. These outcomes also refer to on-the-job behaviours. Considering any such decisions may impinge upon statutory rights, why does the Code of Practice fail to enlighten apprentices of their absolute right to representation? How was legal advice sought on this document in protection of the authors and yet failed to consider the welfare of the very individuals for whom the entire Apprenticeship is based i.e. Apprentices?

Section 19 of the revised Code of Practice sets out a clear and transparent appeals process for any sanctions placed upon an apprentice for a breach of the Code of Practice. Similar guidance is provided for Employers in Section 8.

19. Does SOLAS accept that any decision taken in error by them, that results in suspension, termination or any other disciplinary measure of an apprentice may be in conflict with existing contractual & collectively agreed disputes procedures? In addition to this are they aware that interference or undermining of such procedures would make distinguishing between the employer and SOLAS virtually impossible for the purpose of a dispute or third party case?

SOLAS has no intention or wish to undermine any established procedures that apprentices are subject to from employers or training providers.

Apprentices must take responsibility for their own learning during the apprenticeship programme. They are required to follow the Code, the Employer's policies and procedures, as well as the rules, policies and procedures of the Education Providers.

The SOLAS Authorised Officer will help Apprentices to comply with this Code. Where possible, they will advise Apprentices of potential or apparent breaches of the standards and obligations of the Code. However, SOLAS reserves the right to impose the appropriate sanctions as set out in Section 14 and will consider each case of alleged breach of the Code of Practice individually based on the information that is available. Apprentices or employers have the right of appeal to any sanction imposed by SOLAS under Section 15.

Governance and consultation

20. The presentation outlined all parties that were consulted. The original and subsequent Code of Practices were always written with the inclusion of the Trade Union i.e Worker/Learner Representatives included. Why were they excluded?

In May 2026, the draft of the Code of Practice was shared for observations with all members of the National Apprenticeship Alliance. The NAA includes trade union members.

21. SOLAS oversees and regulates the Craft Apprenticeships. Will there be an alternative body established to regulate how the different consortia implement the rules & regulations defined in the updated Code of Practice?

SOLAS holds overall responsibility for all apprenticeship programmes as determined by the Industrial Training Act 1967.

Further questions

If you would like to ask additional questions about the new Code of Practice you can do so via this [MS form](#) , which will be open until the 13th November.