



**WALES  
CYMRU**

**RESPONSE TO:**

**Balancing the responsibilities for  
skills investment: proposals for co-  
investment in post-19 adult skills  
delivery**

**Contact Details:**

**Lisa Edwards  
Policy and Communications Officer  
UCU Wales  
Unit 33, The Enterprise Centre  
Tondu  
BRIDGEND  
CF32 9BS**

**Tel: 01656 721951  
E-mail: [ledwards@ucu.org.uk](mailto:ledwards@ucu.org.uk)**

1. The University and College Union (UCU Wales) represents more than 7,000 academics, lecturers, trainers, instructors, researchers, managers, administrators, computer staff, librarians, and postgraduates in universities, colleges, adult education and training organisations across Wales.
2. UCU Wales is a politically autonomous but integral part of UCU, the largest post-school union in the world: a force for educators and education that employers and government cannot ignore.
3. UCU was formed on the 1st June 2006 by the amalgamation of two strong partners – the Association of University Teachers (AUT) and the National Association of Teachers in Further and Higher Education (NATFHE) – who shared a long history of defending and advancing educators’ employment and professional interests.
4. We welcome the opportunity to respond to the consultation on balancing the responsibilities for skills investment: proposals for co-investment in post-19 adult skills delivery

**Question 1** – What are your views on the proposed skills performance measures, including the Level 3 attainment benchmark?

**Response**

It is agreed that it is appropriate to aspire to the majority of the population of Wales to have at least 1 level 3 qualification or above by 2024; however care should be taken that the drive to achieve this target is not to the detriment of those who will be unable to attain this. There is the potential that the choice of lower level courses is narrowed to the point that there are few opportunities to engaged those who require the stepping stones to get them to level 3. Literacy and numeracy qualifications alone are not always the best way to inspire people to improve their qualifications and skills. We must also guard against the temptation to ‘dumb down’ the quality of qualifications in order to achieve targets.

**Question 2** – How do you consider co-investment being used as a mechanism for improving the value of vocational education and training in the delivery of higher-level skills?

**Response**

The use of co-investment as a mechanism for improving the value of vocational education and training in the delivery of higher level skills may provide a means of helping to support the development of parity between vocational and academic qualifications. Higher level vocational qualifications may hold more value to employers if they have made a cash investment into the programme. This could in turn, lead to a shift in public perception towards vocational alternatives, if employers and higher education institutions begin to actively seek employees or students with vocational qualifications. However, it may take more than just co-investment to shift the reluctance to regard vocational qualifications as equal to academic qualifications.

**Question 3** – How could co-investment be used to support employers in better utilising the skills of their employees? Are there examples of best practice from which Wales can learn?

**Response**

With regard to supporting employers to better utilise the skills of their employees, whilst it is considered important to deliver learning that is of value to employers, it is equally important to deliver learning that is of value to the community as a whole. Discussions that focus on circumstances and qualifications that are considered to be worthy of co-investment or not, and are dependent on their perceived value to employers, run the risk of undermining the principles of a curriculum that promotes the development of wider skills, that will provide learners and employees with the flexibility and creativity to adapt to rapid technological change and market globalisation. The increase in job insecurity and the ageing workforce mean that few have jobs for life, therefore the availability of upskilling and reskilling should not solely be dictated by market failures and employer values. Individuals need the opportunity to gain a wide range of portable skills, which may not always be seen as advantageous to individual employers. As stated in the consultation document, the Employer Skills Survey highlights gaps in wider skills such as planning and organisation; skills which are not necessarily specific to different types of employment. As the

Pisa results demonstrate, there is a lack of wider social awareness and skills that also hold back the education of the workforce in Wales.

**Question 4** – What are your views on the establishment of a pricing structure to maintain levels of quality, value and price in the delivery of qualifications and learning?

**Response**

Before commenting we would like to see more detail on any proposed pricing structure. It is debateable that the quality of learning and of qualifications can be defined by a monetary a value.

**Question 5** – What are the risks or issues that could potentially undermine the implementation of a co-investment policy in Wales and how could these be addressed?

**Response**

The success of co-investment is likely to be dependent on economic prosperity and stability; therefore the Welsh Government will need to consider safeguards to protect employees and learners from the effects of negative market forces. Co-investment may well provide support to employers who wish to upskill their workforce but require financial assistance to do so; however, meaningful education and training should not be available only in times of economic prosperity. Evidence suggests that in times of economic downturn, the provision of staff training and development is likely to be cut. In the wake of the 2008 stock market crash, the results of the Learning and Development Survey 2009, released by the Chartered Institute of Personnel Development, reported that the majority of organisations had imposed cuts on training budgets; however the survey also found that the recession had not adversely affected views on the importance of training, so although the benefits of employer investment are realised, reliance on co-investment to upskill the workforce in Wales, to the proposed skills performance measures may be reliant on employer prosperity.

**Question 6** – What additional incentives could be used to support employers to increase their investment in the skills system, including potential levy arrangements?

**Response**

Compulsory training levies may help to ensure that employers in Wales contribute to the cost of training, particularly in the light of the employer skill survey 2013, that employers in Wales are less likely to invest in skills than in any other part of the UK. If used, compulsory training levies should be proportionate to the size of the business and care should be taken that they are not counterproductive, by increasing the risk of redundancy, if the reason for non investment is one of economic viability. However it is agreed that employers should be encouraged to better utilise the skills of their employees, through investment in training opportunities, in order to increase the personal, social and economic benefits that this will bring to Wales

**Question 7** – Under what circumstances would you consider it important for co-investment to be waived or limited?

**Response**

In the event that it could be proven that co-investment would cause unavoidable job losses. However, threat of redundancy should not be used as an excuse to avoid employer investment in training.

**Question 8** – In your view, which qualifications or learning should not be supported by any form of government investment and why?

**Response**

Qualifications that are not recognised on the DAQW

**Question 9** – How could a co-investment policy be used to support the development of Welsh language skills in the workplace?

**Response**

Welsh Language skills, like all other skills that are considered important in promoting employment in Wales, should be given equal consideration in terms of co-investment.

**Question 10** – Beyond Essential Skills to Level 2, what other skills areas do you see as fundamental to provide the foundation for improving skills levels in Wales? How could co-investment be used to support these skills areas?

**Response**

It is important that individuals are given the opportunity to attain skills that not only progress them in the workplace, but will allow them to participate as valued members of a community, be that local or global.

If the focus is only on level 2 essential skills, which in reality would mean focusing on numeracy and literacy, this may lead to the neglect of the funding of other valuable, but less measurable skills, such as creativity and interpersonal skills. There is no doubt that numeracy and literacy skills are important, but they should not be to the detriment of wider social and developmental skills. The provision of essential skills, should as far as possible, be relevant. Those who have not fared well under the compulsory education system, often flourish in an adult working/educational environment, which can support their skills development in a meaningful context.

As previously stated care should be taken that training and development opportunities are not so restricted that they create a lack of engagement with those that need to be supported in gaining essential skills. Thought should be given to the provision of adult community learning and the route that this can provide, as a way back into more formal learning.

**Question 11** – How might a refocused Employer Pledge be structured to support employers to invest in the skills of their workforce?

**Response**

Before commenting on a refocused Employer Pledge it would be useful to have more detailed proposals. However account should be taken, of the success of the Wales Union Learning Fund and the role of Union Learning Representatives in the workplace.

**Question 12** – In the context of co-investment, what considerations should be given to support vulnerable groups who are in employment to address their skills needs?

**Response**

Although it is recognised in the consultation that there are vulnerable groups that need to be given special consideration, account also needs to be taken of those who perhaps do not fall into any of the mentioned categories. For example, those who are in full time employment, but have found themselves trapped in 'in work' poverty. What option will there be in such circumstances, if the provision of training is at the mercy of the employer and there is no funding available from other sources? Whilst employers should contribute to the funding of employment related training, this should not be the only avenue available to individuals who wish to further their education and training, in order to gain alternative employment. There is a risk that if demand is lead by employers alone, the choice of education and training options will narrow opportunities available to individuals.

**Question 13** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Consideration needs to be given to who provides and develops the training opportunities available. Consideration also needs to be given to the standardisation of provision. Further Education Colleges are already in a strong position to be able to deliver the training and development needs of employers and employees and

have been doing so for many years. College lecturers are in a unique position in as much that they can offer expert industry experience and understanding, in an environment that will encourage and develop wider learning and social skills. Therefore we strongly recommend the continuation of links between colleges and employers, but with the addition of much wider inclusion of the expert opinion of practising lecturers, in the development of educational and training provision that takes account of delivering skills for employment, but within a broader pedagogic framework to help develop a creative, thinking workforce that is more able to adapt to change.

We would oppose any system of individual co-investment that would discourage or prevent the participation of individuals in furthering their skills. Evidence from England suggests that the introduction of loans for adults has deterred participation. Research by BIS found that older learners and Muslim learners would be put off further training and education, if they had to take out a loan.

We have concerns over definitions of quality and value for money, when it comes to a pricing system. Value for money is seldom equal to quality, in education.

The emphasis of the consultation paper is very much based on understanding the value that employers place on the existing skills system and types of learning outcome. Consideration should be given to the value placed on education and training by the wider community. There is a risk that if the focus of employers is on employment skills (which appear to be defined as numeracy and literacy) and that these skills are determined by the needs of only the employers, particularly when importance has to be balanced with cost, this could potentially lead to the exclusion of wider interpersonal and creative skills that allow the development of the flexible and adaptable workforce needed to keep Wales competitive in a global market.

Responses to consultations may be made public, on the internet or in a report. If you would prefer your response to be remain anonymous, please tick here:

Thank you for taking the time to respond. We do not intend to acknowledge individual responses unless requested.

Please tick here if you would like to receive an acknowledgement: