



**WALES  
CYMRU**

**RESPONSE TO:**

**Aligning the apprenticeship model to the  
needs of the Welsh economy**

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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.

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.

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.

We welcome the opportunity to respond to the consultation on aligning the apprenticeship model to the needs of the Welsh economy.

**Question 1** – How can apprenticeship progression be strengthened to provide clear routes into higher apprenticeships?

Apprenticeships need to be a robust and respected vocational route. They need to offer real opportunities for employment and not be a means of cheap labour. There is much focus on employer need, but this should be balanced with community and individual need. A more balanced input into the development of apprenticeship routes would help to empower and inform all stakeholders and help to strengthen the understanding and the value of the provision. We suggest that the focus should therefore be on the needs of industry rather than employer needs and should include the input of the related trade unions, to help ensure that apprentices receive quality training that will lead to sustainable employment.

Whilst we agree that there should be clear progression routes, that are understood both by potential apprentices and employers alike, we are unsure how it will be possible for many potential candidates (who are likely to be over the age of 25 according to figure 1, page 8 of the consultation document) to access the Higher Apprenticeship programmes without government funding.

Whilst it may be appropriate to offer higher level apprenticeships to provide an alternative undergraduate equivalent, we are of the opinion that the apprenticeship route is not generally suited to older adults, most of whom will have had work experience and therefore will not need the ‘world of work’ element of the apprenticeship scheme. They may also be prevented from taking part due to the ‘low pay’ offered to apprentices. We would suggest that higher apprenticeships, as a progression route for older adults, were replaced by appropriately paid employment offering appropriate continuous professional development, as it is likely that many such adults will already have level 3 qualifications as a minimum. Perhaps what is needed here is clarification of the use of the word ‘apprentice’. Apprentice, suggests a person who has limited knowledge and understanding of a particular set of occupational skills, whereas studying a subject at level 4 or above would suggest that

the individual already has some mastery of the subject area.

Currently employers are obviously expected to provide training for their apprentices, but how often, when and where, are at the discretion of the employer. In order to strengthen progression routes there would need to be some clarification and standardisation of expected levels of training, supported by appropriate regulation, otherwise there can be no parity between the quality of apprenticeships that differing employers provide, which will make it very difficult to determine the appropriate next level of progression.

**Question 2** – What delivery models would support expansion of higher apprenticeships, particularly in technical occupations?

Higher apprenticeships need to be accessible to those that wish to undertake them and we support the development higher apprenticeships as an alternative route to HE and into professional sectors more commonly associated with graduate entry. However, the majority of those taking the higher apprenticeship route are over the age of 25. Without adequate financial support, it would seem unlikely that expansion will be possible. Any model of apprenticeship needs to ensure that the services that underpin its provision, are adequately funded in order to support the quality of delivery. Despite the promotion of the co-investment model, we are not wholly convinced by the argument that funding to the FE sector will 'trickle down' from SME's into the colleges. In order to provide a robust support mechanism, FE colleges need proper funding of their core provision. Current funding cuts are stretching colleges to their financial limits. It cannot be expected that colleges will be able to deliver the remit required of them, if they do not have the facilities or the staff to support this. Neither can we expect the remaining staff to deliver the level of teaching and learning required to promote the apprenticeship scheme as a high quality alternative route to employment, as they faced with the ever increasing workloads and class sizes required of the effects of endless 'efficiency gains'. Alongside this, there is likely to be the increasing problem of failing to attract adequately qualified staff with appropriate industrial experience, while working conditions for lecturers continue to be eroded.

There would also need to be investment in the level of CPD provided in FE colleges to ensure that lecturers can keep up to date with developments in industry and industry standards.

**Question 3** – Is the proposal to commence the completion of apprenticeship programmes at Level 3 the best way to achieve the objectives of: raising skill levels of the workforce; providing viable alternative education routes to university; and improving the economic benefit of investing government money in apprenticeships?

Traditionally an apprentice would be a novice entering the workplace. For the apprenticeship to be successfully completed, the apprentice would be expected to

have achieved a certain level of competence. If the appropriate level of competence required by employers is set at level 3, then it would not seem appropriate to offer a standalone level 2 course, which would be unlikely to lead to employment, unless the sole purpose is to aid progression to level 3. Therefore it could be feasible to incorporate a level 2 element in a level 3 apprenticeship as this would simply offer a course that offered a pathway from novice to competent. However, it would be necessary to accept that not everyone embarking on the course would successfully complete the apprenticeship; a concept that may also help to raise the perception of quality. However, we would be concerned if level 2 provision were removed altogether, as it provides an important opportunity for young people to participate in education, where they might not otherwise engage. Having said that, we agree that level 2 provision should not be an excuse for poor quality 'apprenticeships' which do not lead to good employment opportunities.

Skills levels will not necessarily be raised by simply eradicating lower level courses. The chart on page 8 of the consultation document appear to indicate that there is a clear demand for foundation apprenticeships and their removal may leave a void for many potential apprentices.

There may be a need to explore the reason why so many school leavers need to repeat level 2 courses immediately after leaving school. Hopefully the Donaldson Review will open up the possibilities for there to be a wider and more appropriate choice of level 2 vocational qualifications offered to 14-16 year old, enabling those who struggle at traditional level 2 academic courses to thrive, by following equivalent and respected vocational choices at school. Therefore the next logical step for the majority after leaving school at 16, would become level 3 as the norm.

Raising the skills levels of the workforce is an issue that should start long before leaving school.

With regard to providing a viable alternative to Higher Education, all level 3 qualifications should be accepted as a level 3 mark of achievement and as such, should be an acceptable entry requirement to Higher Education, to allow flexibility in progression routes for individuals. The difficulty lies in that the skills and knowledge gained in one subject may not be directly transferrable to a higher level in another subject. How do you equate the skills of a master builder to those of a master of philosophy? The skills may be very different, but it's the level of expertise that's important.

Although there should be flexibility in progression routes and an acceptance that the different levels of qualifications are a mark of expertise that has been achieved, regardless of the subject matter, there needs to be recognition that the traditional university route is not necessarily the appropriate place for all level 4 and above learning to take place. However, as already stated in answer to question 1, we do not see that higher apprenticeship are necessarily the right approach to upskilling adults; it would depend on the nature of the sector for which the apprenticeship was designed.

In terms of government investment of money, we believe that investing in the continuing education of adults would greatly enhance economic and social wellbeing in Wales. Schemes to assist employees to embark on appropriate opportunities for

continued professional development, which allowed them to access higher level qualifications such as HND/HNC, whilst still earning a living wage in order to support themselves and their families, would be a wise investment of public money. It would also support the OECD observation that level 3 qualifications should allow for successful participation in 'lifelong learning'. Investment in opportunities for appropriate and affordable lifelong learning that are easily accessible, will, in our opinion, be of great benefit to raising the skills levels of the workforce in Wales. We would argue that investment in further and adult education would be a more appropriate way of enabling adults to improve their skills, increase their employment opportunities, enhance their wellbeing and improve the communities they live in.

**Question 4** – How could Level 2 provision be delivered outside of the apprenticeship model?

As outlined in our answer to question 3, enhancement of level 2 vocational education for 14 -16 year olds, could address this issue and hopefully increase the number of school leavers successfully gaining level 2 qualifications.

At post 16, there is perhaps scope to develop a pre-apprenticeship course for those who did not gain level 2 qualifications whilst at school, or for those who are unsure of the career path they wish to take. This could include a mixture of careers advice, personal development, support for literacy, numeracy and digital literacy as required and bite sized work experience opportunities in different industries, to help inform student choices and increase their employability skills. This type of approach may also benefit those who are unable to progress to level 3, by preparing them for the transition from school to work and making them more attractive to prospective employers.

As suggested in the consultation there is also scope for there to be a level 2 component of level 3 provision, allowing for seamless development of skills. For example, some awarding bodies already use a system where a level 3 qualification is broken down into separate parts (Award, Certificate and Diploma), allowing for the student to gain the whole qualification (the Diploma), which can provide the licence to practice, or if the whole qualification is unobtainable for some reason, the level 3 Award or Certificate can be gained, which would provide evidence of a level of skill/attainment, but would not lead directly to employment in that discipline.

To look an example from the past, the old SEN/SRN routes into nursing, provided sound and respected access to careers in nursing for students of differing levels of ability. It recognised that the skills needed for the job were not just academic and that healthcare would benefit from the variety of skills that individuals could bring at different levels, to enhance the provision. It also allowed for opportunities to convert to SRN/RGN at a later stage and also to specialise if desired. Perhaps this would useful model on which to develop differing levels of apprenticeship.

**Question 5** – To help inform our assessment of the possible impact of these proposals can you foresee any particular impact on those with protected characteristics (within the meaning of the Equality Act 2010) and how they might be particularly affected by these proposals?

The continuing attitudes within sectors and the public at large, that men and women go into certain industries and into particular jobs, means that women continue to be channelled into lower-paid jobs, with less opportunity for career progression. It also means that their potential development and overall contribution is restricted.

Statistically girls achieve higher levels of learning in all GCSE subjects than boys but may often find themselves discouraged from applying for those apprenticeships which are more likely to have better prospects, be better paid and have more robust terms and conditions – such as those in the engineering and manufacturing sector for example.

There are a number of apprenticeship programmes that now recognise this issue. They are in traditionally non-female job roles. The programmes are developing good practice and are making real progress in ensuring that they attract, develop and retain women. For example, Women into Science and Engineering (WISE) helps organisations to inspire women and girls to pursue science, technology engineering and maths (STEM) subjects as pathways to exciting and fulfilling careers. They have worked in partnership with trade unions, to highlight issues in this area. They support and champion women role models, encourage their women apprentices to speak at local schools and take leading roles in promoting apprenticeships. They insist on any school visits or work experience programmes being 50/50 girls and boys. They ensure apprentices are supported with mentors and have developed a programme which supports its apprentices achieving at the highest level. They also ensure their workers are supported with flexible working arrangements to support any caring responsibilities they may have.

Apprenticeships in hair and beauty and childcare are also disproportionately dominated by women. For any men wanting to undertake these roles, they also need support and encouragement.

Apprentice programmes should be equally accessible to men and women as well as particular social and racial groups and for those with disabilities. We should ensure that any materials use to promote and deliver apprenticeship programmes challenge traditional stereotypes.

Workplaces offering apprentice programmes should develop effective policy, practice and culture for gender inclusion and wider diversity. They should implement sustainable culture change by training, mentoring and monitoring.

**Question 6** – What would be the impact of limiting government-funded apprenticeship places to employees in new job roles?

We would agree that the practice of enrolling existing employees onto apprenticeship programmes is contrary to the purpose of the apprenticeship scheme.

With regard to the value of investing public funding to support existing employees who are not in new roles, to enrol on apprenticeship programmes, we would question why an employee would need to embark on an apprenticeship programme, if they were already in the job and considered competent. If they were not competent, we would consider it the role of the employer to provide appropriate CPD to their employee. This might include assistance with further training or qualifications either on or off site. Even if the employee were competent, but required significant new skills or knowledge to continue, we would expect this to be offered by the employer as CPD. However we are aware of the financial implications that this may have for many SME's and the frustration and stagnation that this can cause both individuals and businesses. The role that Further Education can play in providing CPD should not be underestimated and we suggest that public funding would be better spent on investment in the FE sector.

**Question 7** – What would be the impact on employers and apprentices of moving the apprenticeship programme offer towards occupationally specific apprenticeships?

We would agree that in recent years the focus of the apprenticeship programme has been lost. Today, some of the programmes on offer look very much like the YOP/YTS courses that were offered in the 1980's; basic introductory skills and little substance.

For some employers a move back to occupationally specific apprenticeships, might be inconvenient as it removes a supply of cheap, expendable labour. However in terms of promoting the status of vocational qualifications and increasing the skills levels of Wales, it is a necessary step and would be of benefit to the majority of employers and apprentices.

We support the proposal to increase the esteem and value of an apprenticeship as an alternative education route, by ensuring that apprenticeships provide an occupational focus that enables individuals to acquire technical skills and knowledge to become professionally competent.

**Question 8** – What issues have you encountered in relation to the delivery of Essential Skills Wales qualifications when apprentices already have comparable or higher-level qualifications in similar subjects?

It can be a great source of frustration to both tutors and students, when students are expected to undertake Essential Skills Qualifications that are below or equal to levels that they have already acquired. This repetition represents a waste of time for both students and tutors, which could be better spent in the pursuit of new or higher level skills. It also represents a waste of funding, spent on unnecessary qualifications.

Essential skills qualifications are not intended as additional qualifications, but as alternative access to literacy, numeracy and IT skills, for those that need support. Students who already have an equivalent level of comparable qualification should not need that extra support. However, it is not unusual to hear reports where students have gained a grade C or above in an Essential Skills related GSCE, but score lower than this level on basic skills assessment tests, indicating the need for some standardisation across the qualifications.

Another source of frustration for tutors and students of vocational qualifications is that levels of essentials skills attained, may not always be equal to the levels of occupational skills required. For example better numeracy skills, do not necessarily make a person a better at their job. Although it is desirable and socially responsible to make sure that citizens acquire opportunities to be as numerate and literate as possible, it should not be confused with one's ability to function as a valuable employee or member of society. Although we support parity of status between vocational and academic qualifications, care should be taken not to devalue vocational qualifications because they are not 'academic' enough.

**Question 9** – Do you think that proxies for Essential Skills Wales qualifications should be accepted within apprenticeship frameworks?

Yes, for the above reasons. Likewise, apprentices should not be penalised for not achieving the prescribed level of essential skills, if it doesn't prevent them from being occupationally competent.

**Question 10** – Which qualifications do you believe that it would be reasonable to accept as proxies for particular Essential Skills Wales qualifications?

Comparable levels of qualifications such as GSCE Maths, English/Welsh, ICT are the obvious examples. However, perhaps qualifications gained in subjects that are relevant to the apprenticeship that they wish to undertake, could also be considered. For example some science subjects might contain evidence of adequate levels of mathematical understanding to be appropriate to some types of apprenticeship, as will



qualifications that have required a certain level of literacy in order to pass them successfully.

The issue here again, might be reframing the idea that it's vital to have such qualifications in their own right if they are not directly relevant to the ability to be competent in a specific job role. Again, whilst it is desirable and responsible to offer opportunities to improve literacy, numeracy and digital skills, is it desirable or responsible to prevent a person from achieving their potential in another area, because they have not achieved an expected level of essential skills?

Thus we perhaps need to ask if the practice of requiring proxy qualifications for Essential Skills is always appropriate, if they are not essential skills required to be able to carry out the job role competently?

**Question 11** – How can Welsh Government encourage an increase in demand for Welsh-medium apprenticeship provision?

Whilst recognising that there is a desire to promote and encourage the use of the Welsh Language, this may be very much dependent on the demand for such apprenticeships from employers/industry/apprentices. It may be appropriate for the Welsh Government to incentivise Welsh medium apprenticeship provision, but this would need to be balanced with demand for incentivising other equally valuable skills.

**Question 12** – What does the Welsh Government need to consider regarding the compatibility and portability of apprenticeships between the English and Welsh systems?

It goes without saying that apprenticeships gained in Wales need to be valid outside Wales. Therefore the apprenticeship framework in Wales needs to be aligned to the standards of wider industry and not just on industry and employer need in Wales. This would also involve consideration of industry need and apprenticeship standards further afield and consideration of best practice beyond the UK.

**Question 13** – Are there aspects of the English reformed system which would further enhance the apprenticeship system in Wales?

All three main political parties have outlined their policies on apprenticeship, but it will be difficult to comment on English reforms until after the General Election. However, as already stated we agree that standards need to be agreed, but we would disagree that they should be set by employer led panels. We would prefer that that

occupational standards required by apprenticeship programmes should be set by panels that are industry focused, rather than employer led and panels should include trade union representatives to ensure that the apprenticeship system in Wales is based on partnership between all stakeholders. We note that this is outlined in the paragraph at the bottom of page 17 of the consultation document and are supportive of this approach.

Reforms in England have been undertaken with varying degrees of success. The intention to put funding in the hands of employers has been re-thought due to significant opposition. Providers have also found that some trailblazers are not open to discussion or consultation and yet the providers are key stakeholders, without whom the reforms will not succeed. The Welsh government should heed these concerns and not repeat the same mistakes.

UCU believes that although apprenticeship duration has been increased to 12 months, decreasing the mandatory off-site learning in England from 30% to 20% is misguided because good quality education, including time for reflection away from the workplace, should be core to a rigorous apprenticeship. We also do not believe apprenticeships are enhanced by removing requirements for qualifications as this reduces the transferability and value of learning in the general labour market away from the specific employer. However the move towards independent, holistic assessment at the end of an apprenticeship will allow for a clearer focus on teaching and learning throughout the apprenticeship helping develop competencies for the vocation as opposed to ticking boxes relating to small tasks.

It is clear therefore from the English reforms that consultation and partnership must form the basis of any proposed changes to ensure that they have the greatest benefit to learners.

**Question 14** – What would be the benefit of establishing employer panels to have a role in advising on the design and content of apprenticeships and informing demand annually at a sectoral level?

We would prefer the panels to be 'industry' led as opposed to 'employer' led. The focus of the design and contents should be 'industry' standards, rather than standards which may differ somewhat from employer to employer. We would also advocate the inclusion of the appropriate trade union representatives on this panel.

**Question 15** – How could Qualifications Wales support the Welsh Government’s aim to be more responsive to employer need and ensure that the content of apprenticeships has a high degree of labour market relevance?

The remit of Qualifications Wales could be extended to granting approval for apprenticeship frameworks which have been developed through industry panels, which are based on the partnership between industry experts, employers and trade union representatives. Qualifications Wales could therefore take on a gatekeeping role regarding the quality of the design, delivery and assessment of apprenticeship frameworks, developed by the industry panels.

**Question 16** – 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.

In line with the TUC charter on apprenticeships, we agree that apprenticeships should:

1. Be a job with a productive purpose.
2. Be paid a fair rate.
3. Ensure high quality training and clear individual development.
4. Involve the trade unions at every level of the programme.
5. Ensure apprenticeship have regular access to and support from, trade unions.
6. Be accessible and achievable.
7. Be part of, and contribute to, a healthy and safe environment.
8. Entail a commitment from the employer to complement the workforce, not supplement it.

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