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Consultation – summary of responses

Aligning the apprenticeship model to the needs of the Welsh economy

Date of issue: July 2015

Aligning the apprenticeship model to the needs of the Welsh economy

Audience	All bodies concerned with post-16 education and training in Wales, including employers and their representative bodies; further education colleges; work-based learning providers; higher education institutions; trades unions; Jobcentre Plus; Careers Wales and awarding organisations.
Overview	This report provides a summary of the responses received as a result of the Welsh Government consultation <i>Aligning the apprenticeship model to the needs of the Welsh economy</i> published on 22 January 2015. The content of this report will be used to inform the ongoing development of policies associated with apprenticeships in Wales.
Action required	In the context of this consultation respondents should consider the policy actions outlined within the <i>Policy statement on skills</i> (Welsh Government, 2014).
Further information	Enquiries about this document should be directed to: Post-16 Policy Branch Department for Education and Skills Welsh Government Tŷ'r Afon Bedwas Road Bedwas Caerphilly CF83 8WT e-mail: Post16policybranch@wales.gsi.gov.uk
Additional copies	This document can be accessed from the Welsh Government's website at www.gov.wales/consultations
Related documents	<i>Aligning the apprenticeship model to the needs of the Welsh economy</i> (2015) <i>Policy statement on skills</i> (2014)

Contents

Introduction	2
Responses to questions	6
Annex: List of respondents	17

Introduction

Background

The Welsh Government launched the consultation *Aligning the apprenticeship model to the needs of the Welsh economy* on 22 January 2015. The purpose of the consultation was to seek the views of employers, apprentices, training providers and other stakeholders who are involved in the design and delivery of apprenticeships to help shape and inform the future of the apprenticeship programme in Wales in line with the ambitions within the Policy Statement on Skills, published in 2014.

The purpose of this report is to provide a summary of the responses received as a result of the consultation and to highlight any key themes that have emerged. Every response to the consultation has been considered in preparing this summary report and its content will be used to inform the ongoing development of policies associated with the apprenticeship programme in Wales. Given that this document aims to provide an overview of responses received, it has not been possible to present all the views expressed through the consultation nor does the summary itself stand as a representative sample of public opinion.

The consultation process

In accordance with Welsh Government regulations the consultation was carried out online and using a response template made available on the Welsh Government website. Respondents to the consultation were able to submit their views by post as well as e-mail. A specific version of the consultation was also made available for Young People. The consultation was open for 13 weeks and closed on 24 April 2015. Welsh Government officials attended 7 specific workshops and meetings arranged by key stakeholders to present the detail of the consultation document and gain further input from those organisations involved.

Analysing the responses received

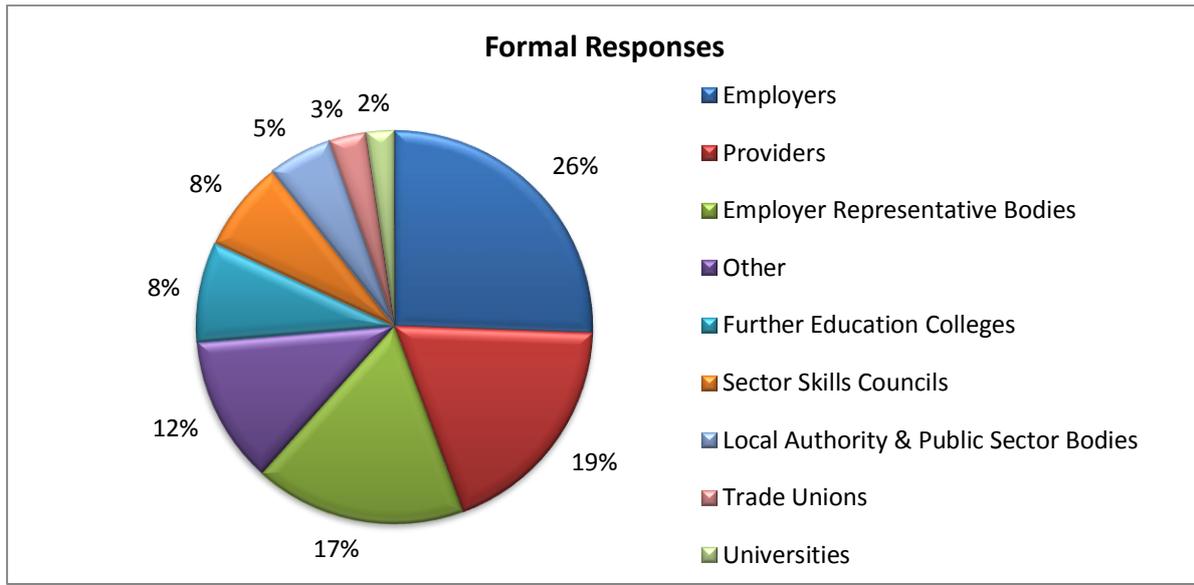
In total 133 formal responses and 21 informal responses were received to the consultation. Both formal and informal responses form part of the statistical analysis provided below and have been considered in drawing together the key points highlighted in this summary report.

163 responses were received to the specific consultation made available to Young People. Although the questions contained within this document were slightly different to those in the formal consultation document, the areas for discussion were broadly similar. These responses have also been analysed and are reflected within this report according to the formal response to which they relate.

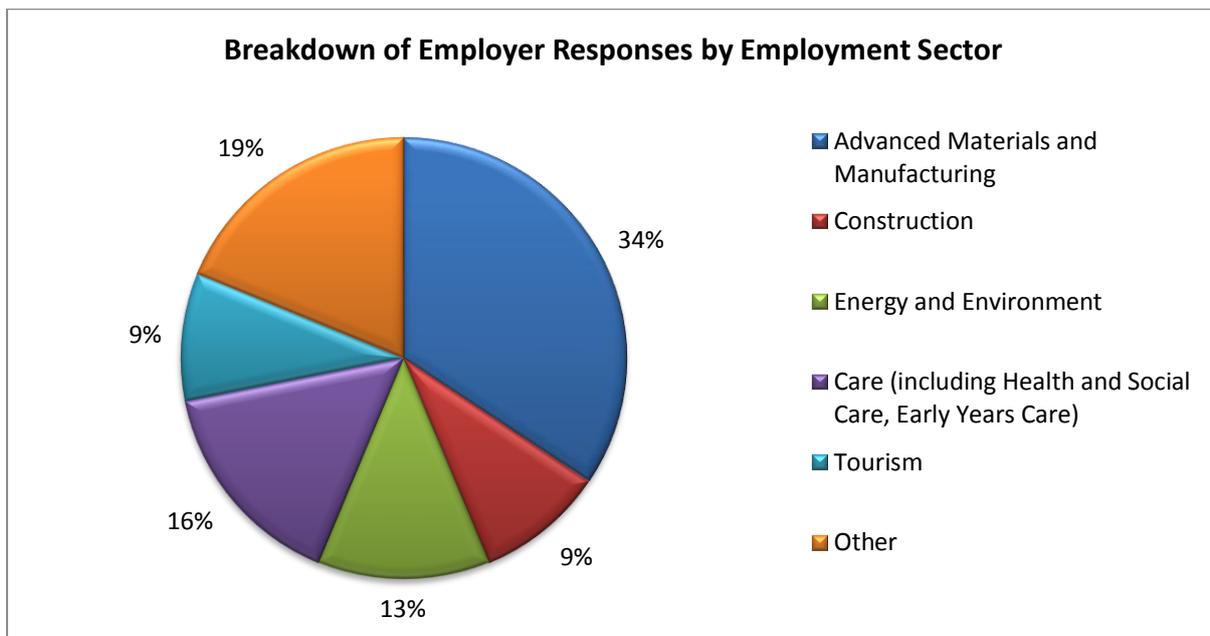
Demographics

Some respondents did not recognise the description for their organisation type, size or operating industry as provided by the response template. In these cases respondents generally opted to select 'other' and provided further information on their operating industry.

Formal responses were received from a wide variety of organisations/interests:



The greatest number of formal responses was from employers. For analysis we have broken these down into different sectors:



In the chart above 'other' includes responses from employers in the following sectors: Finance; Food and Farming; Life Sciences; Retail; Public Sector; and ICT. A single response was received for each of these sectors.

Summary of responses

The formal consultation document consisted of 15 questions across a range of areas relating to apprenticeship delivery in Wales. The consultation for young people consisted of 7 questions that broadly related to the formal consultation. For the purposes of this document, these responses have been matched to the formal question they were most closely linked to.

Given the style of questions put forward by the consultation, and the corresponding breadth of responses received, it has not been possible to provide a purely quantitative analysis of the views expressed. Instead the approach taken has been to summarise the range of responses received to each question.

Informing policy development

The consultation generated a number of responses and, in summary, respondents were generally supportive of a new apprenticeship programme for Wales. There was a great deal of support for the development of Higher Apprenticeships, but not at the expense of Level 2 apprenticeships which were felt to fulfil a crucial role for the sector as a whole.

Many of the responses focused on the need for better communication of what the apprenticeship programme was – for employers, for schools and for parents – for all to get a better understanding of what the benefits of the apprenticeship programme might be, and for it to have parity with academic qualifications.

There were some concerns with regard to funding – specifically what levels are funded, and for whom. There was a call for the funding to be more evenly distributed, and allocated on a ‘stage not age’ basis.

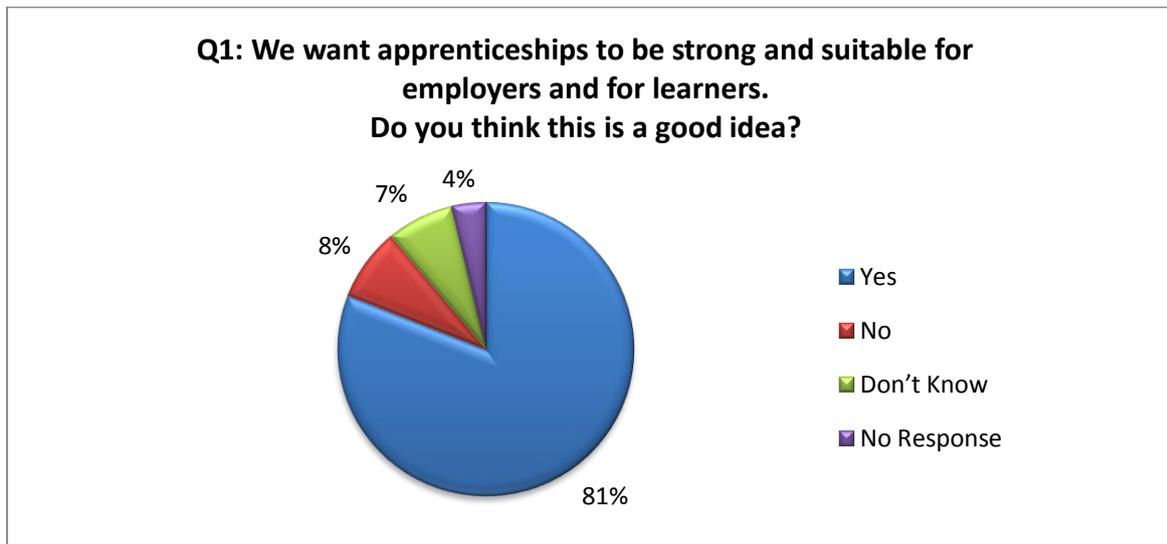
Whilst respondents agreed that much could be learned from the programmes being developed in England, Scotland and Northern Ireland, there was a consistent desire for a programme designed specifically to meet the needs of employers and young people in Wales; especially when considering the number of SMEs and micro-businesses in Wales. There was also a clear message to ensure the voice of smaller employers was not lost in the development of apprenticeship programmes.

All agreed that it is vital for all apprenticeships, regardless of sector or programme, to have a good and consistent level of essential skills (Level 2). However, respondents were keen that the requirement for all apprentices to undertake Essential Skills Wales qualifications should be reconsidered, and urged for proxies to be used where there was clear evidence that an apprentice already had that level of skill.

What emerged strongly through the consultation was the importance of close working relationships between government, employers and education providers (especially in Further Education and Higher Education) to ensure that the programmes are developed consistently, with clear and equitable skills levels, and with clear progression routes for learners.

Overall the respondents to the Young Persons' consultation were supportive of apprenticeships and felt they provided young people with clear opportunities for the future. The vast majority of respondents felt that it was important that apprenticeship programmes were developed to be strong and suitable for employers and learners across Wales.

Young persons' consultation responses:



Next steps

Responses to the consultation will be used to inform the development of an implementation plan for a new apprenticeship model for Wales which will be published later this year.

Responses to questions

A summary of the responses received to the questions put forward within the consultation are as follows.

Q1: How can apprenticeship progression be strengthened to provide clear routes into higher apprenticeships?

The majority of responses were in favour of enhancing routes into Higher Apprenticeships, and felt that progression would be improved by greater links with employers, Sector Skills Councils, and Professional Bodies. This would help to develop the programmes, to raise the profile of apprenticeships, and to ensure that there were clear progression routes for learners.

There was a plea for continued funding support from Government for all levels of apprenticeships - to be offered on a “stage not age” basis to appeal to a wider cohort.

Some respondents felt that the specifications for Higher Apprenticeships need improvement, with a call to transfer the focus from assessment to the acquirement of knowledge – although this was not supported by all respondents. The programmes need to be flexible to appeal to a wider cross section of employers and learners.

Parity of esteem with other qualifications was raised – especially with regard to A Levels and University qualifications. There was a perceived lack of recognition and respect from schools, universities and employers of the value of apprenticeships.

Respondents felt that more effective communication is needed to raise the profile of Apprenticeships to help parents, learners and employers have a better understanding of them.

Some respondents felt that the word “apprenticeships” could be seen as disparaging for the higher levels, and felt a different way of describing the provision could be valuable when promoting Levels 4, 5 and above.

There were some contrasting opinions, however, and a clear message that Higher Apprenticeships may not be appropriate or relevant to all sectors. This was especially true for some of the SMEs who did not feel that they could offer the employment opportunities that Higher Apprenticeships would require. There was a call for the Welsh Government to clearly identify the sectors where Higher Apprenticeships were appropriate and to focus provision on those sectors rather than having a national approach.

Q2: What delivery models would support expansion of higher apprenticeships, particularly in technical occupations?

There was a great deal of support for the expansion of Higher Apprenticeships.

Respondents felt that introducing joint qualifications, with Higher Apprenticeships incorporating either industry recognised professional qualifications or existing Higher Education Institution (HEI) qualifications into their programmes would enhance their reputation and relevance.

There was support for a shared model of learning whereby an apprentice could gain experience with a different employer or at a college when their needs could not be met at their standard place of work.

There was also a call to consider a range of specialities within particular sectors.

Many respondents felt that improved communication and collaboration between employers, would aid the development of the programmes which need to be employer-led.

Clear transition and progression routes between levels were seen to be important including, most significantly, an increase of opportunities at Level 4 to help the transition from Level 3 to Level 5. Respondents also wished for Higher Apprenticeships to be accessible from Level 4 if an applicant's skills set was evidently already at Level 3.

Respondents felt that it would be valuable to focus more time, through Level 3, on study skills and preparation for the higher levels to help prepare learners for the different levels of study needed at Level 5 and above.

There were conflicting responses relating to the mode of study for Higher Apprenticeships. Some felt that it would be beneficial to focus primarily on the acquisition of knowledge – more in keeping with University Degrees. However, the vast majority felt that on-the-job training was the specific benefit of apprenticeships and should be retained at higher levels.

Many respondents emphasised the need for Higher Apprenticeships to be industry relevant, but also to have parity with University qualifications. In addition, greater partnership working between HEIs, Further Education Institutions (FEIs) and Work Based Learning (WBL) providers, was needed to ensure the gap between vocational and academic qualifications was bridged.

Q3: 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?

There was a clear divide amongst respondents to this question.

Many believed that Level 3 was the minimum level required to make apprenticeships viable and valuable; and that commencing the completion of programmes at Level 3 would have a positive impact on the sector and increase its recognition and relevance.

Counter to this, many respondents felt that removing Level 2 apprenticeships would have a detrimental effect, and would prevent a number of young people from accessing apprenticeships. There needed to be some recognition and acknowledgement that for some learners Level 2 was the appropriate level for their learning.

There was support for retaining Level 2 apprenticeships as a ‘foundation’ level, and a clear acknowledgement that Level 2 often provided the ‘basics’.

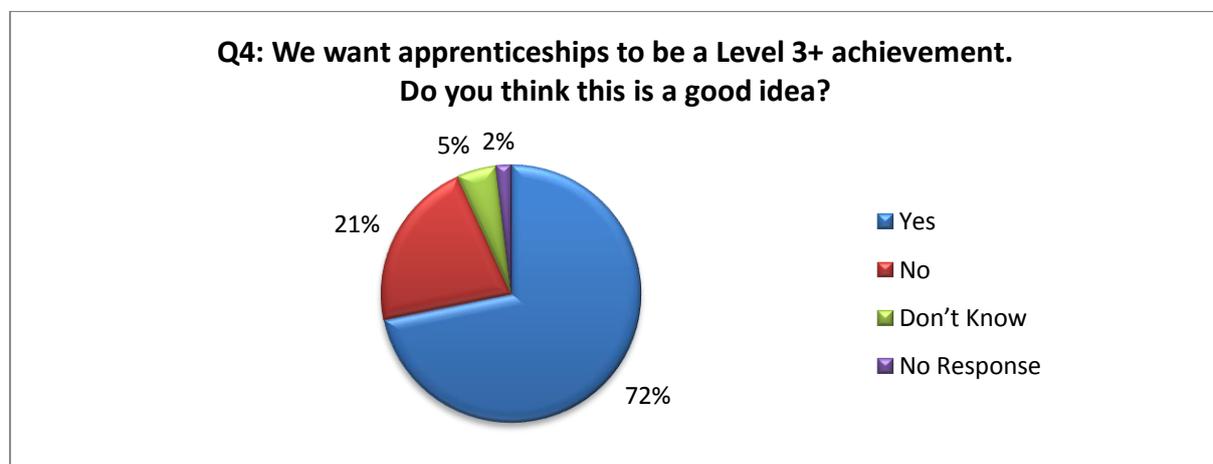
There was almost unanimous agreement that merging Level 2 and Level 3 programmes would be detrimental. It would potentially endanger the reputation of the Level 3 apprenticeship, but also make the programme too long which would be off-putting for both employers and learners.

Respondents felt that the apprenticeship programme needed to be branded effectively to ensure they were marketed appropriately at the right levels.

Overall it was emphasised that a ‘one size fits all’ approach to the apprenticeship programme would not be appropriate.

The majority of respondents to the young persons’ consultation were in favour of apprenticeships being focused at Level 3.

Young persons’ consultation responses:



Q4: How could Level 2 provision be delivered outside of the apprenticeship model?

Respondents felt that Level 2 provision could be incorporated into existing delivery through schools or FEIs – linked with GCSEs – as part of a pre-apprenticeship programme. However it was stressed that it would need to retain the vocational element of the work and not focus only on the academic elements.

There was support for the Level 2 provision to be shortened by reducing some components to enable learners to progress through it more quickly - incorporating more on-line learning opportunities.

Some respondents suggested moving funding for Traineeships from the existing Level 1 to Level 2 provision, but there was concern that this could be seen to devalue apprenticeships in some way.

There was also support for establishing a new programme of learning around Level 2 as a way into apprenticeships, but there was concern that this could be confusing for both learners and employers.

However, the significant majority of respondents were opposed to the removal of the Level 2 provision from the apprenticeship programme and felt it would lead to a significant skills gap for learners. A number of respondents felt strongly that Level 2 apprenticeships delivered a specific set of skills. There was a suggestion from some respondents that Level 2 apprenticeships could be retained for specific sectors only.

Q5: 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?

A significant number of respondents felt that there would be no discernible impact on those with protected characteristics.

The majority of concerns related to the proposed removal of Level 2 provision. Removing this level could adversely affect those with learning disabilities, those with literacy and numeracy needs, and those from minority backgrounds (where their first language was not English). It was felt that these learners may not be able to operate at Level 3 and above.

Some respondents felt that the removal of Level 2 provision could adversely impact women and learners aged over 25.

The same was said of younger learners who were more likely to be accessing provision at Level 2.

Other concerns related to funding, and the impact of reductions in funding for learners over the age of 25.

Q6: What would be the impact of limiting government-funded apprenticeship places to employees in new job roles?

There was a mixed response to this question.

Some respondents fully supported this proposal and felt that apprenticeships in their truest form should only be for new employees in new roles.

However, there was concern from many respondents about the impact on existing employees, and that the proposal was contrary to the programme's stated aim of improving the skills of the workforce in Wales.

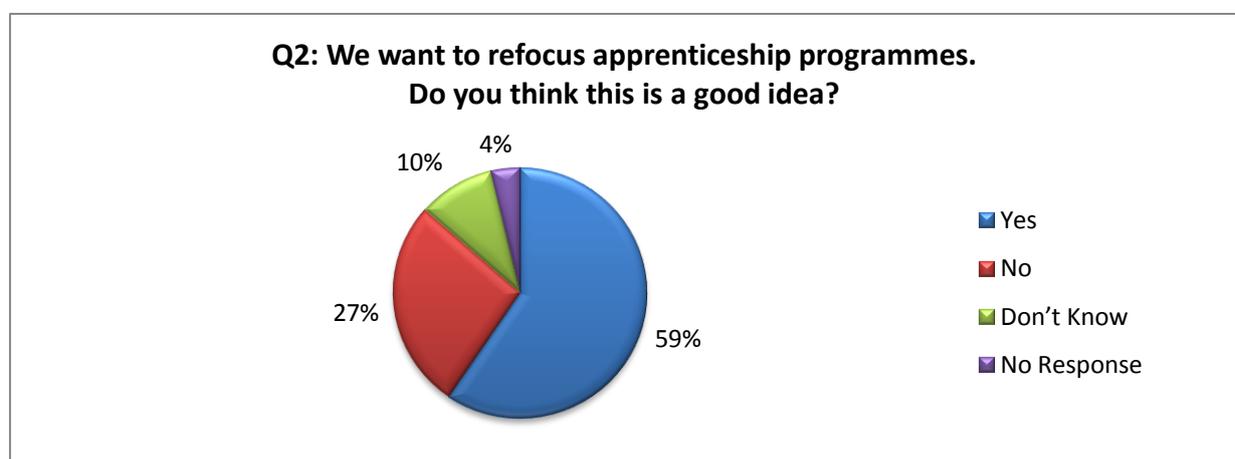
There was a strong feeling that apprenticeships should not be used as a substitute for employee training, but that limiting provision could a two-tiered system between those on the apprenticeship programme and long-term employed people who were not benefiting from learning opportunities. A significant investment in CPD would be required for existing employees, but there was concern over whether employers would invest in this training. There were fears that existing staff may leave their jobs in order to access training opportunities with alternative employers.

Respondents questioned whether there would be sufficient 'new roles' to make this proposal viable, and that restricting the programme could limit it to 16-18 year olds. This then led to the fear that that employers would be hesitant to sign up apprentices who had no prior knowledge or experience of the sector.

Many respondents suggested a different funding mechanism could be introduced whereby the bulk of the investment went on new entrants, but that some funding should be available for existing employees.

The majority of respondents to the young persons' consultation agreed that refocusing the apprenticeship programme would be a good idea.

Young persons' consultation responses:



Q7: What would be the impact on employers and apprentices of moving the apprenticeship programme offer towards occupationally specific apprenticeships?

The vast majority of respondents were supportive of this proposal.

It was felt that having specific apprenticeships would vastly improve the performance of the programme and meet the needs of employers more readily.

Respondents urged the need to ensure an element of flexibility, and the importance of ensuring that all apprentices had the ‘basics’ before they went on to specialise. There is a clear need for a firm level of consistency in these skills – a role perhaps for the Level 2 programme.

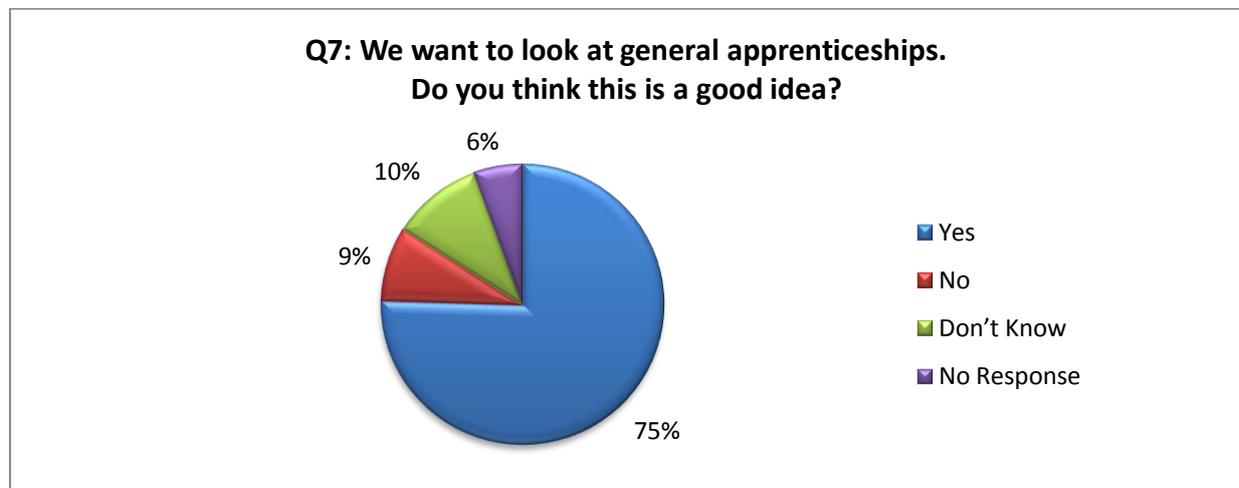
A number of respondents felt that the current offer is being devalued by more general occupational apprenticeships and that moving towards occupationally specific apprenticeships could help reverse the dilution in the concept of apprenticeships.

Respondents queried how these changes might impact on SMEs, who may not be in the position to offer a specialist programme of activity.

It was strongly felt that the programmes would need to retain a level of transferability to ensure that apprentices didn’t end up with too restrictive an employability base. There was equally a concern over limiting provision too much on ‘priority areas’, which could lead to significantly limiting opportunities for many.

Three quarters of the respondents to the young persons’ consultation felt that it would be a good idea for the Welsh Government to consider the role of general apprenticeships.

Young persons’ consultation responses:



Q8: 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?

All respondents agreed that having good literacy, numeracy and IT skills were essential for all apprentices.

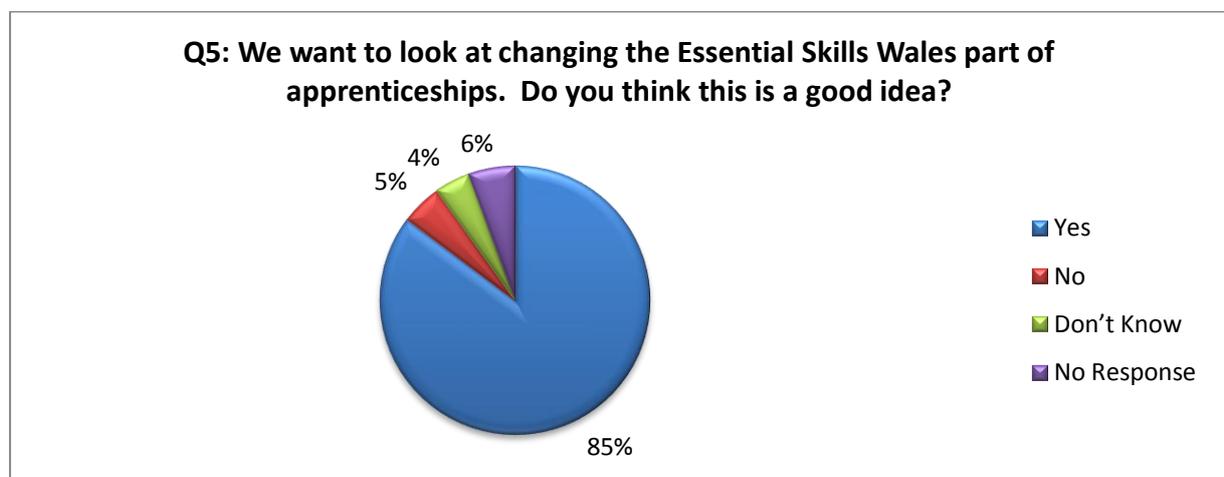
Respondents felt it was time-consuming for all learners to undertake Essential Skills Wales qualifications, and that learners felt demoralised and demotivated by having to undertake training they did not see as relevant.

Respondents called for either an exemption clause where necessary, or some form of transferability of qualifications, so that apprentices with recognisable qualifications in these areas would not be expected to sit ESW qualifications.

It was acknowledged that some apprentices would need additional training and support in this area so the proposal was not to remove this element entirely, but to include some recognisable and evidential exemption criteria.

The vast majority of respondents to the young persons' consultation felt that it was important for the government to consider the role of Essential Skills Wales in developing the new apprenticeship programmes.

Young persons' consultation responses:



Q9: Do you think that proxies for Essential Skills Wales qualifications should be accepted within apprenticeship frameworks?

There was considerable support for this proposal from the majority of respondents.

Respondents felt that careful consideration and very clear guidance would need to be issued to ensure that all providers were clear what level of qualification could be used as a proxy and whether there were any restrictions or limitations on their use.

Respondents were clear that the importance of ensuring all apprentices had a good level of basic skills knowledge and understanding (Level 2) was essential and that proxies should only be used if they were clear evidence of that level of skill.

Q10: Which qualifications do you believe that it would be reasonable to accept as proxies for particular Essential Skills Wales qualifications?

The majority of respondents felt that the any qualification for numeracy, literacy or digital literacy at Level 2 or above should be acceptable as a proxy.

The following qualifications were specifically mentioned by the majority respondents:

- WJEC GCSEs (grade C minimum) (equivalent to Level 2);
- AS and A Levels in English and maths (Grade C minimum)
- Welsh Baccalaureate (Intermediate)
- UK wide qualification equivalents (i.e. GCSEs and Scottish Standards/Highers)

It was strongly felt that any qualifications approved as proxies should be independently marked and accredited.

Q11: How can Welsh Government encourage an increase in demand for Welsh-medium apprenticeship provision?

There were conflicting responses on what the level of demand would be for Welsh-medium provision.

Many respondents believed that sufficient provision for Welsh-medium apprenticeship was already available but that more needed to be done to promote it more widely.

Some respondents felt that the existing structure would not support an increase in demand; whilst others did not consider that there was sufficient demand for Welsh-medium provision in their area of work. Others felt that demand should be determined by employers and employees and not the Welsh Government.

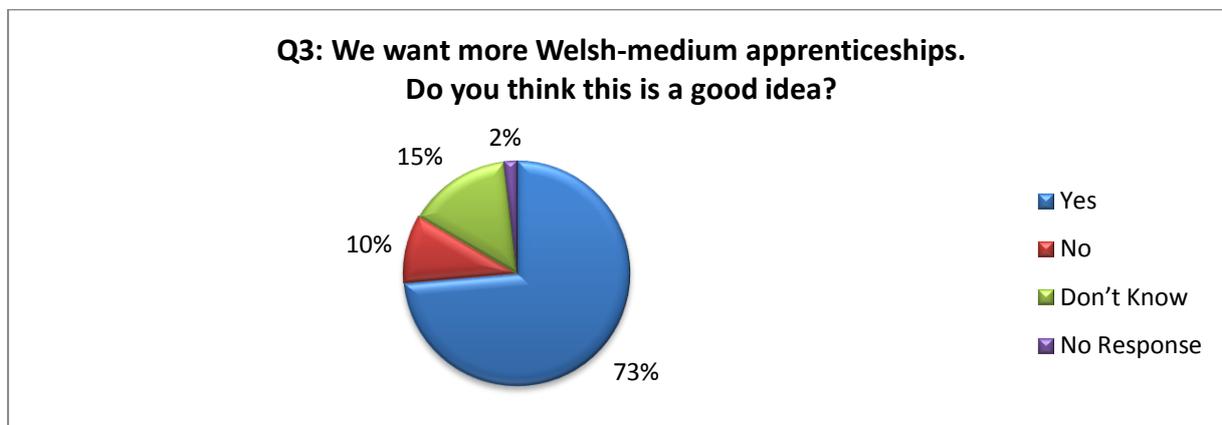
There was some support for a full review to be carried out to assess demand before any additional funding is invested.

Some respondents felt that the Welsh Government should target Welsh-medium businesses to encourage them to take on more apprentices; as well as targeting Welsh-medium Schools to better advertise the availability of apprenticeships.

There were also some proposals for mandating or funding specific support for provision. Some respondents felt that funding should be allocated to Awarding Bodies to develop materials and train assessors to enable more Welsh-medium provision. Others felt that the Welsh Government could mandate all Work Based Learning providers to provide a bilingual service.

Nearly three quarters of respondents to the young persons' consultation felt that there should be more Welsh-medium apprenticeships.

Young persons' consultation responses:



Q12: What does the Welsh Government need to consider regarding the compatibility and portability of apprenticeships between the English and Welsh systems?

The vast majority of respondents agreed that it would be vital for the Welsh apprenticeship programme to have parity and compatibility with its English counterpart. Respondents were cautious of not following the English model too firmly whilst it was still being embedded, and were keen to ensure a Welsh model was developed independently.

This was seen as especially true of the skills levels, and the end test result – which it was felt need to match the English model for demonstrable occupational competence.

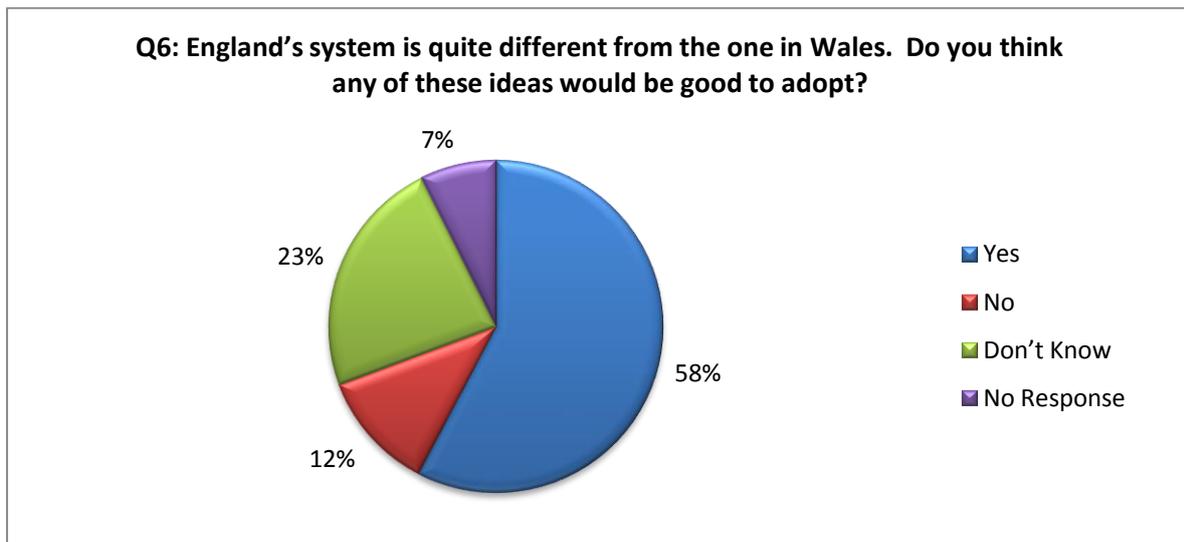
Respondents felt there should be a core set of occupational competencies across both programmes to ensure parity and to enable apprentices from both sides of the border to move freely once they are qualified.

There was a call to ensure that employers could be assured that any apprentice, whether qualified through the Welsh or English model, would have an equitable skills set.

Respondents also asked for the apprenticeships schemes in Scotland and Northern Ireland to be considered; and there were suggestions of a National (UK-wide) recognised standard to ensure consistency (along the lines of the National Occupational Standards - NOS).

The majority of respondents to the young persons' consultation agreed that it would be a good idea for the Welsh programmes to adopt some elements of the programmes offered in other parts of the UK.

Young persons' consultation responses:



Q13: Are there aspects of the English reformed system which would further enhance the apprenticeship system in Wales?

A number of respondents felt that there were some key aspects to the English system that could enhance the development of apprenticeships in Wales.

Foremost of these was the engagement with employers that had been such a focus of the English model. Respondents believed that this approach would be of huge benefit to Wales. They did sound a note of caution that Sector Skills Councils should be engaged in the development to ensure that the programmes were not unduly influenced by larger employers at the expense of the many SMEs in Wales. They warned against giving larger employers too much power and control.

There was disagreement over whether to introduce an end-test for apprentices - as there is in England. Some respondents were supportive of there being some form of graded assessment during the programme, to ensure consistency, but did not believe an end-test would necessarily be the best way of achieving this.

Some respondents felt it was important to design an entirely independent programme for Wales.

There was a great deal of support for some form of quality benchmark across both programmes to ensure consistency and parity.

Q14: 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?

Employer panels were seen as a positive proposal by almost all of the respondents.

Some respondents stated that Employer Panels already exist in some sectors, and there was an urge to ensure that these existing arrangements were utilised where possible to save repetition and duplication of effort.

Respondents urged the use of Sector Skills Councils who may already have similar frameworks in place.

Many respondents believed that for Employer Panels to work it is important that they represent the whole sector and there was a strong emphasis on ensuring that SMEs, micro-businesses and self-employed personnel were included along with larger employers.

It was also suggested that including Higher Education Institutions, Further Education Institutions, and other training providers on the panels would enhance their value.

Q15: 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?

Respondents felt that Qualifications Wales was perfectly placed to provide expert advice on the development of Apprenticeship programmes and qualifications. Their role would include ensuring that Apprenticeship Programmes were not developed in isolation from other Educational programmes and qualifications.

Respondents also felt that Qualifications Wales could provide a useful role in facilitating a variety of networks and panels, including Sector Panels, Employer Panels and engagement with learning providers and awarding bodies.

There was some disagreement on whether Qualifications Wales should be the Gatekeeper and Issuing Authority for apprenticeships. Many respondents supported this idea and felt that the organisation would be best placed to serve this role.

However, other respondents were concerned that this would pose a conflict of interest for the organisation.

Respondents did agree that the organisation needed to work closely with employers in developing qualifications for Apprenticeship Programmes to ensure they reflected the needs of employers accurately and effectively.

Annex: List of respondents

Respondents who did not indicate that their input to the consultation should be withheld:

Aberystwyth University (AU)/Ceredigion County Council (CC)

Acorn Group

Agored Cymru

Airbus

Amberleigh Care Ltd

Anglesey County Council

Aspiration Training Ltd

B&ES - Building & Engineering Services Association

British Gas

British Hospitality Association

Capestone Organic Poultry Ltd

Cardiff and Vale College

Cardiff University

Care Council for Wales

Care Forum Wales

Carillion

Ceredigion County Council

Chartered Insurance Institute

Chwarae Teg

CILEx

CIPD Branch Mid wales

CITB

City & Guilds

Clybiau Plant Cymru Kids Club

CMI

Coleg Cambria

Coleg Gwent

Coleg Sir Gar on behalf of the UWTSO Group

Coleg y Cymoedd

Colegau Cymru

Compact Orbital Gears

Conwy County Council

Creative Skillset Cymru

CYFLE

Dawnus Construction Holdings Ltd

DRAC Consulting

Drinks Wales

DVLA

Educ8 Ltd

Electrical Contractors Association

ELLIOTS Hill Care Ltd

Engineering Construction Industry Training Board (ECITB)
ESTYN
Federation for Industry Sector Skills and Standards
Federation of Awarding Bodies
Flintshire CC
Focus Training
FSB
Glyndwr Cymru
Grwp Llandrillo Menai
Gwrych Castle Preservation Trust
Higher Education Funding Council for Wales
HORIZON NUCLEAR POWER
ICAEW
Improve Ltd
Industry Wales
Institute of Physics and Engineering in Medicine (IPEM)
IQE plc
ISA Training Employer
ISA Training provider
JGR Training
JTL
Lantra
Learning Disability Wales
LSKIP
Mudiad Meithrin
NASUWT
National Caravan Council
National Day Nurseries
National Deaf Children's Society
National Hairdressers Federation
National Museum Wales
Network Rail Training Centre
NIACE
NPTC Group
NTFW
NUS Wales
OCR
Park House Court Ltd
Pembrokeshire College
Pendine Park Teaching Care Centre
Peoples 1st
Powys Training Skills Academy (Powys County Council)
Progression Training
Regional Learning Partnership South West
Senta
SGD Security Group

Skills Academy Wales @ NCPT
Skills Active
Tata Steel
The College, Merthyr Tydfil
The Institute of the Motor Industry (IMI)
The Institution of Civil Engineers Wales
The Outdoor Partnership
Tidal Lagoon
TSW Training Ltd
UCAC
UCU Wales
UKCES
Urdd Gobaith Cymru
Valero Energy Ltd
Vocational Skills Partnership
Wales and West Utilities
Wales Pre-school Providers Association
WLGA
Workforce Education Development Services
XR Training