

---

**Ymateb i Ymgynghoriad / Consultation Response**

---

<b>Enw / Name:</b>	Meilyr Rowlands
<b>Rôl / Role:</b>	Her Majesty's Chief Inspector of Education and Training in Wales
<b>E-bost / Email:</b>	<a href="mailto:ChiefInspector@estyn.gov.uk">ChiefInspector@estyn.gov.uk</a>
<b>Rhif Ffôn / Tel No:</b>	02920 446 446
<b>Dyddiad / Date:</b>	9 December 2019
<b>Pwnc / Subject:</b>	Structure for Welsh Apprenticeship Frameworks

**Background information about Estyn**

Estyn is the Office of Her Majesty's Inspectorate for Education and Training in Wales. As a Crown body, Estyn is independent of the Welsh Government.

Estyn's principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000 and the Education Act 2005. In exercising its functions, Estyn must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Estyn's remit includes (but is not exclusive to) nurseries and non-maintained settings, primary schools, secondary schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and teacher education and training.

Estyn may give advice to the Assembly on any matter connected to education and training in Wales. To achieve excellence for learners, Estyn has set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

## Introduction

Estyn broadly supports the proposals within the consultation document. Apprenticeships should be of high quality and be a viable alternative to A levels and higher education. They should provide learners with high level skills to sustain employment and have clear progression opportunities. They should equip learners with the practical skills and theory knowledge for today and into the future. They should provide equality of access and ensure availability of bilingual training and assessment when required.

- Apprenticeships should be a high quality alternative to A levels and higher education and provide parity of esteem with other routes at each level
- They must equip learners with the skills employers need today and into the future
- They must have clear progression routes
- Training and assessment should be available bilingually where appropriate
- Apprenticeships should be portable and of high quality
- Apprenticeships should meet the needs of a wide range of employers and cover the full spectrum of occupational routes

**Question 1** - Do you agree with the principle of apprenticeship sectors and pathways being linked to occupations?

<b>Agree</b>	<input checked="" type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
--------------	-------------------------------------	-----------------	--------------------------	-----------------------------------	--------------------------

## Supporting comments

Estyn broadly agrees with the principle that apprenticeship sectors and pathways being linked to occupational areas. Apprenticeship routes need to be clearly defined to make sure all key partners including potential learners, parents, employers and careers advice personnel are fully aware of what frameworks are available. It would also be highly beneficial if clear information was available regarding the progression opportunities in each route. Apprenticeships must be clearly promoted and offer a well-understood and viable option in addition to other education and training routes such as A levels and university. Parity of esteem between alternative routes should be promoted and supported vigorously across all sectors. The value of apprenticeships in learners developing transferable skills that transcend individual occupations and sectors should also be recognised as a

vital design principle in apprenticeships given the rapid and radical changes in technology and working practices.

**Question 2** - What impact might occur in removing existing generic frameworks (e.g. business administration and management)?

These generic frameworks encompass a wide range of training programmes. However, the training that learners undertake in each is generally clearly defined to their job roles and responsibilities. A very limited number of generic frameworks have the ability for their content to be tailored to meet the needs of learners and employers. Although they have a generic overarching title, the content within them is specific to the area of learning. By having frameworks that are particularly rigid in all occupational sectors, this could lead to learners undertaking frameworks that are not an exact match to their job role and responsibilities. In these cases, learners would be required to undertake roles and possible assessments that are alien to their day to day roles and will not be beneficial to their progress and development. For example, business, management and law covers a wide range of apprenticeships and is therefore a wide occupational area that will have specialist pathways. However, apprenticeship pathways that are clearly focused on the area of learning are more beneficial than a wide ranging framework.

It is important to recognise that not all training that may be required within a job role should be built into an apprentice framework. The levy has compounded this situation. For example, where an exact match apprenticeship framework is not available, the training is often linked into an existing framework. As more levy-paying employers engage in apprenticeships the range of available apprenticeships needs to be in place to match demand. By removing generic frameworks, there needs to be flexibility and responsiveness to employer demand and skills needs, to be able to create new pathways where a gap is identified.

**Question 3** - Are there any broad occupational sectors you would expect to see that are not included?

The occupational areas with the most significant number of learners appear to be included within the proposed list of pathways. However, in future the relevant authority needs to be mindful to not only meet the current and future training needs of the larger, multi-national businesses, but also the significant number of small to medium enterprises and micro-business across Wales. The planning of the apprenticeship offer needs to consider the current and future training requirements of levy paying employers. It also needs to consider what labour market information is showing for the next five years and employer demand. These frameworks must meet the needs of the Welsh economy and have strong employer support.

**Question 4** - Should any of the proposed occupational sectors be renamed, realigned, merged or split?

The proposed list of occupational sectors appears to identify the most significant learning areas that deliver apprenticeship programmes. The sectors should be named by how they are known in their relevant industry to ensure the understanding of learners, employers and key stakeholders is consistent and the same. Estyn broadly agrees with the way the sectors have been identified and aligned.

**Question 5** - Are the occupational pathways appropriate and aligned correctly within sectors?

The proposed list of occupational pathways appears to identify the most significant learning areas that deliver apprenticeship programmes. The pathways also generally align with those in England for portability and parity. Some sectors have pathways specifically about management within the sector but not all. It may be helpful to consider, for consistency across the sectors, the appropriateness of having a management pathway specific to that sector.

**Question 6** - We would like to know your views on the effects that changes to the structure of apprenticeship frameworks in Wales would have on the Welsh language, specifically on:

- i) opportunities for people to use Welsh

- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

**Supporting comments**

Estyn broadly supports the principle of the framework changes to make sure that learners have equal access to teaching, learning and assessment material in English and Welsh. Historically these materials have been available in limited quantities being dependent upon the number of learners who requested formal written assessment or training in Welsh. Written assessments should be available bilingually to make sure they are available when requested, significantly reducing the lead time to produce papers.

**Question 7** - Please also explain how you believe the proposed policy could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

**Supporting comments**

In creating new apprenticeship frameworks, national bodies, such as the Coleg Cymraeg Cenedlaethol, should be engaged to work closely so that the apprenticeship programmes within the frameworks are developed bilingually and have clear progression routes for apprenticeship learners to enhance their Welsh language skills throughout the programme. This includes developing learners' use of Welsh language as an employability skill, particularly within key priority sectors such as health, public services and care, as well as business and management.

**Question 8:** 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.

The document states that demand for apprenticeships is changing as employers seek skills at higher levels. Estyn agrees in principle that learners should have the opportunity to progress to higher levels. However, they should enter training at the most appropriate level to their particular level upon entry and the needs of the employer. Inspection evidence shows that many employers require learners to undertake training at levels two or three. Level three has been the level at which a learner is acknowledged as being 'skilled'. These learners make a valuable contribution to the work of their employers and are valued employees. A significant number of employers in Wales are small to medium enterprises or micro-businesses and most wish to employ learners at these levels. Estyn fully supports the view that the young need to recognise apprenticeships as a credible and beneficial alternative to A levels and traditional full-time undergraduate provision. However, this remains a significant challenge. It is not just potential learners who need to develop their understanding of this viable option, but schools and parents who may have a pre-conceived idea based on not having a clear understanding regarding what options are available to their children.

Apprenticeships must provide training that leads to occupational competence. Apprenticeships must provide substantial training, support and mentoring both on and off-the-job, with high levels of employer support. It is essential that the focus on improving learners' literacy, numeracy and digital skills remains as a core component of apprenticeships.

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: