

Aligning the apprenticeship model to the needs of the Welsh economy

Consultation response form

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Responses should be returned by 24 April to:

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Or completed electronically and sent to:

e-mail: Post16policybranch@Wales.GSI.Gov.UK

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

Whilst we see that take-up of the Higher Apprenticeships is not as we would like in the automotive sector, on the flip-side the IMI with our engagement with employers in Wales does not highlight any issues with the current higher apprenticeship frameworks, also neither the current Level 2 or Level 3 frameworks which were developed with input and lead from employers operating in the sector.

We believe that there are couple of barriers that prevent learners progressing to higher apprenticeships. Firstly in the automotive sector, at Level 4 and above these are managerial level occupations, and as such we do not believe that it helps calling Level 4 and 5 programmes 'Apprenticeships' which might have perceptions attached to them.

In the automotive sector there will always be less people progressing into the higher programmes, as there are a fewer number of opportunities available for workers to progress into.

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

As per the response to Question 1, we don't believe for the automotive sector that there are any changes required to the higher-level apprenticeships. These tend to be based around the general leadership and management skills and occupations, with the technical aspects being covered off in the Level 2 and 3 apprenticeship programmes.

Currently there appears to be a nice progression route through the levels of apprenticeship programmes available, however, more can be done to promote the higher-level apprenticeships; but also communicating that these are leadership and managerial programmes for those working in the sector.

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?

The IMI does not believe that this is the best way forward for apprenticeship programmes in the automotive sector. Currently, across the UK, we see completion rates of 65% at Level 2, with 35% at Level 3. This shows that not all learners are able to progress to Level 3 programmes. This could be for a variety of reasons, for example there is not the number of occupation vacancies available which link in with the Level 3 programmes; learners might have reached the level that they feel that they want to reach; or they move into other sectors on completion.

When we look at the Level 2 programmes in the automotive sector we see these linked to 'technician' occupations – those who conduct routine maintenance, repair and service on vehicles – but under supervision. This might include fitting brakes; exhausts, tyres and routine servicing. Where we look at the Level 3 programmes we see those who are of a more 'supervisor' level (having normally progressed through the Level 2 Apprenticeship model) and who might also carry out the more diagnostic duties to locate faults in the vehicles and then instruct and supervise on the repair.

The number of opportunities available does not match across the levels – and indeed the Level 3 standard occupations are more highly paid. With the current Level 2 – we believe that there has to be some form of programme that inducts learners into the automotive sector and gives them the robust, rounded programme of a job and learning that leads to achievement and supports them in their entry into the sector, but might not lead to a Level 3. To remove the Level 2 option would see a massive decrease in the number of apprenticeships offered in the automotive sector.

We do support, however, the ambitions of the Welsh Government for providing suitable alternatives to the education routes, which are not appropriate to all and also raising the skills levels of the workforce – however, we believe that this can still be achieved without the removal of the Level 2 apprenticeship programmes.

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

This could be handled in a number of ways. Firstly you could actually build in the occupations that are covered by Level 2 programmes and embed them into the Level 3 programmes; but with natural drop-off points so that Level 2 learners could leave the Apprenticeship programme at the certain points. It would need to be ensured that there was some form of assessment mechanism so that the learners were not leaving the programme without any form of recognition for what they had completed.

This would also ensure that all Level 3 learners had covered the basics in terms of general maintenance and repair and would have that good grounding to be able to move forward with the Level 3 diagnostic and team leading skills.

The second way would be to develop and rebrand the current Level 2 programme as perhaps a different programme outside of the apprenticeship branding. You could have the standalone qualifications still offered, but there would be a great deal of work to change the built-in views of the sector around the Level 2 programmes being apprenticeships.

Whatever the solution, as there is so much that is integral between Level 2 and Level 3 programmes they should not be looked at in isolation. Delivery for a Level 2

programme could be delivered much more in a college-based environment with work placement as appropriate, but we have to be careful that this would not devalue the important aspect of the job and the work place setting.

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?

No, other than the operational practices and the occupation availability in terms of the number of placements available for learners.

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

The IMI is supportive of this initiative in that we agree Government funding should only be available where learners are new into job roles. What we need to ensure, however, is that we see upwards progression as well as progression sideways which are new roles, but might be at the same level and we would not want to restrict learners and employers from limited Government funding, provided it is new job roles for which the funding is sought.

Indeed these new job roles might be with the same organisations, and again we wouldn't want this to have an adverse effect on the attraction of Government funding to support the apprenticeship delivery.

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

The IMI agree with this proposal. Where possible the current apprenticeship programmes are linked to occupations titles and this normally leads to a better

understanding of employers as to the content and outcomes of the apprenticeship programmes. In the current SASW, there is actually a requirement to detail the occupation titles in the documentation.

Where care needs to be taken is ensuring the universal adoption of occupation 'titles' to ensure the wider buy-in. For example we have seen, across businesses, where there is a difference in the use of occupation titles, and indeed across levels.

Where this will work is with the linking in with the appropriate professional body and professional standards, and we would again advocate this approach.

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?

The IMI have experienced the same issues as outlined in the consultation document text. We get queries from providers and learners as to what is acceptable as a proxy or an alternative to the Essential Skills – particularly around GCSE and A'Level achievement. We get the feedback that apprentices become demotivated with having to do learning and achievement of tests that they deem they might have already achieved, or what might be a tick-box exercise, particularly if they have achieved the subject at a higher level.

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

Yes, we believe that proxies for the Essential Skills Wales qualifications should be accepted.

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

GCSEs; A'Levels; Functional Skills, Wider key skills. We also believe that, especially for older learners, there should be the mechanisms for demonstrating proxy from real-life examples where this can be demonstrated, and without taking the formal assessment.

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

The IMI thoroughly test when developing products, including qualifications, NOS and Apprenticeships programmes, whether there is a need, want or requirement to translate the products into the medium of Welsh. We are fully signed up to the Welsh Language Scheme and commit to testing that the needs of employers are met. For any of the products that we develop there does not seem to be a great demand, even when we test the need with employers.

Promotion of the availability of the products in the medium of Welsh will help.

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

Employers who offer apprenticeships across the 4 Nations already find the landscape challenging, especially where they offer apprenticeship programmes that are different in make-up, structure and requirements – but may be for the same occupation. This applies particularly to the larger employers.

We would advocate synergy wherever possible across the 4 Nations of the apprenticeship programmes or standards. This assists with the buy-in of employers, but also assists with the portability of learners across the 4 Nations.

We also need to ensure, however, that the apprenticeship standards are thoroughly tested with the wide spectrum of employers including local small and micro and large National employers to ensure that the requirements match all needs.

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

Currently we believe it is too early to say. We absolutely believe that it is right that employers are at the front of the development and implementation of the apprenticeship standards, and that these are matched to occupations, however we also believe that it is too early in the trailblazer development process to say whether the standards and assessment strategies developed will be a success and will meet

the needs of all ranges of stakeholders.

We have also had employer feedback which indicates fatigue in the commitment needed in order to develop the apprenticeship standard and assessment strategies – and that moving forward there needs to be an impartial employer-led body to maintain and review these standards. We are also at the beginning of the trailblazer activities, with many standards still needing to be developed. What is also becoming clear is that lack of consistency across standards, and particularly the assessment strategies and this could be a barrier moving forward for all stakeholders involved with apprenticeships.

We believe that further work needs to be done after the election if the current Trailblazer model continues to be adopted, and that the Welsh Government would be wise to wait until a full review of the Trailblazer activity had been carried out after the third and fourth round activities had delivered.

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 believe that this is key; however, we also believe that this should include, and could be led by, the appropriate professional associations in the sectors.

We should also be careful to ensure that the make-up of the groups is appropriate and has a mixture of micros, small, medium and large businesses and across the disciplines (e.g. in automotive it could be maintenance; body and repair; motorcycle; autoglazing etc). We believe that productive relationships with employers provide great input and as the professional association for the automotive industry the IMI already has these engagements on a local level which could be used to form these advisory groups.

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?

Employer Engagement is absolutely critical, and part of this is understanding what it is that make up the wants and needs of the different sectors, which might be very different. What is also key is that there is a good mix across sectors, in terms of employers who are engaged to ensure that products meet the needs of large, medium and small businesses. Many of these working relations have already been set up, for example as the professional association for the automotive sector, the IMI already engage employers to assess suitability of apprenticeship, qualifications and occupational standards, and therefore it would seem that if the IMI could work with the Welsh Government to engage with employers this would be a good solution which could avoid duplication of contact.

In addition, the IMI carries out sector-related research including a sector skills assessment to ensure that we keep abreast of emerging developments in the sector, and that these are reflected in the occupational standards, qualifications and apprenticeships. Again, it would seem that there could be some joined up thinking with Qualifications Wales around this, to avoid repeatedly contacting employers.

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.

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:

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