

Response to Welsh Government Consultation Document: WG37780

About Universities Wales

Universities Wales represents the interests of universities in Wales. Our membership encompasses the vice chancellors of all the universities in Wales, and the Open University in Wales. Our mission is to support a university education system which transforms lives through the work Welsh universities do with the people and places of Wales and the wider world.

We welcome the opportunity to respond to your consultation *Structure for Welsh Apprenticeship Frameworks*.

Please find below our responses to the questions posed in the document.

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

We would support this in part. However, there should also be a consideration of how the apprentice learner journey is not necessarily one that ends at the age of 18 by entering the workplace. Apprentices should have the potential for a seamless journey into either the workplace, traditional higher education or indeed a degree apprenticeship.

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

While we are broadly supportive of the reduction in options to simplify the system, there is a risk that some of the fluidity of the learner and their ability to transfer between courses/sectors/jobs may be lost. For that reason, it may be worth having further discussions on potential impact of removing frameworks such as Business Administration and Management. Particularly as this may create a disparity between what is available in Wales and what is available in the rest of the UK.

Employers are clear in their demand for cross-cutting skills, interdisciplinary knowledge and a broad base that will enable their employees to adapt to changes in the business environment and economy. The generic frameworks currently allow employers to effectively upskill their existing workforce and, for a country experiencing a demographic dip of young people, there may be strength in retaining them.

For example, there is some concern that in the case of engineering, early specialisation in a subject area may hinder learners in the future. Opportunities, technologies and materials change often, and learners should be prepared to be responsive to a rapidly changing sector. For example, a mechanical engineer

may work across aerospace, rail or the petroleum sector as a mechanical or maintenance engineer throughout their working life and so they require a broad outlook.

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

No response to be put forward by Universities Wales.

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

No response to be put forward by Universities Wales.

5. Are the occupational pathways appropriate and aligned correctly within sectors?

Yes, although we be supportive of adding Financial Technology as a pathway in section 11.

We would also seek assurance that sufficient flexibility will feature in the framework to allow for alignment with future sectoral priorities and potential developments at level 7.

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**

No response to be put forward by Universities Wales.

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

No response to be put forward by Universities Wales.

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

No response to be put forward by Universities Wales.

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.**

We have not identified any issues in this area.

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.**

On page 8 of the consultation document in the section relating to Welsh Apprenticeship Advisory Board (WAAB), there a list of stakeholders who should be consulted with as part of the development process for a framework. As universities are encouraged to support progression from apprenticeships at CQFW levels 3/4/5 onto degree apprenticeships and higher education courses, we would suggest that universities are included in the list of stakeholders.

Universities Wales would also seek assurance that the Welsh Government tender for Apprenticeships excludes Degree Apprenticeships at HE levels 4 to 6, and the potential future degree apprenticeships at level 7.

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