



Llywodraeth Cymru
Welsh Government

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Consultation – summary of response

Modification of SASW (The Specification of Apprenticeship Standards for Wales)

July 2024

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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Overview

The Specification of Apprenticeship Standards for Wales (SASW) specifies the requirements that must be met for recognised Welsh apprenticeship frameworks to be issued under section 19(1) of the Apprenticeships, Skills, Children and Learning Act 2009 (“the 2009 Act”).

The consultation was undertaken to request feedback on the making of modifications to the SASW, to improve the quality of apprenticeships framework development and delivery to better meet apprentice and employer needs in Wales.

The Welsh Government is grateful to all those who took the time to submit their views.

Action required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [hyperlink](#)

Contents

1. Introduction
2. Consultation process
3. Summary of consultation responses
4. Next Steps
5. List of respondents

Introduction

Apprenticeships are a key intervention in workforce development and in doing so, are a major constituent in driving economic growth. Apprenticeships support new entrants to the labour market and provide support for upskilling and reskilling of workers already in the workplace. They are a vital part of the Welsh Government's Young Person's Guarantee, which provides under 25s in Wales with the offer of support to gain a place in education or training, find a job or become self-employed.

The pandemic, the cost-of-living crisis, the cessation of free movement on the labour market as well as digitalisation and climate change are having a major impact on our economy and employment. Apprenticeships have a central role in supporting recovery and promoting growth but also responding to challenges such as demographic change, digital innovation, sustainable or net zero approaches.

In Wales, an apprentice will follow an approved Welsh Apprenticeship Framework. These frameworks must meet the needs of the economy, industry or skills sector by ensuring an apprentice has the relevant knowledge, skills and qualifications that will enable and support their career choices. Frameworks are available in 23 sectors and within each, there are a range of pathways (options or routes available) based on specific occupations or job roles.

As noted in the Overview, The Specification of Apprenticeship Standards for Wales ("SASW") sets out the minimum requirements to be included in a recognised Welsh apprenticeship framework. Compliance with the SASW is a statutory requirement of the Apprenticeship, Skills, Children and Learning Act 2009.

The Welsh Issuing Authority must have regard to this guidance in reaching a decision on whether a framework submission complies with SASW.

Consultation Process

The consultation ran for six weeks between 25 April – 6 June 2024.

Respondents were asked whether they supported the proposed modifications which will enable SASW to be more flexible and responsive to the changing needs of industry and employers within a rapidly-changing skills environment. Four modifications were proposed. For each, a brief explanation was provided to set the context and provide a rationale to enable respondents to make an informed appraisal.

Respondents were asked their views on four proposals and were able to provide these via a 'free text' format.

Responses were received from 34 organisations and individuals including sector bodies, employers, training providers and educational establishments throughout Wales. It should be noted that not all respondents provided an answer for every question.

Summary of Responses

Proposal 1

To allow additional proxy qualifications and new Digital Literacy proxy qualifications as a recognised alternative to Essential Skills (ES) as detailed under each apprenticeship framework level. Respondents were provided with an updated list at Annex 1.

Agree 31

Disagree 0

No response 3

Of the 31 respondents, supporting this modification, there were several common themes that occurred in the comments which can be summarised as:

- The need for further clarity in some areas, including suggestions for re-wording to improve understanding and application for those referring to the proxies list.
- Suggestions for additional proxies that might be included – for example there were concerns that there do not appear to be overseas qualifications proxies and that there should be more recognition of relevant industry specific skills/knowledge.

Proposal 2

That reasonable adjustments may be made to the minimum requirements relating to communication, application of number and digital literacy foundation apprenticeships (Level 2) and Apprenticeships (Level 3). Respondents were provided with a list of the intended adjustments at Annex 2.

Agree	29
Disagree	0
Unclear	2
No response	3

As noted, 2 respondents were unclear in their answers, therefore making it difficult to determine if they agreed or not. Of the remaining 29 respondents, all agreed in principle but several concerns were raised. These can be broadly grouped into concerns around points of clarity and concerns about what 'competence' means.

Points of clarity included:

- Whether the proposed adjustments would include a longer timeframe to enable learners to complete their apprenticeship
- Further guidance regarding what constitutes an evidenced assessment
- Further guidance regarding how to apply for adjustments, expectations of employers to undertake these and what timescales would be expected
- Strengthening wording around the obligations within the Equality Act 2010 and the Public Sector Equality Duty

Points relating to 'competence' included:

- The ability of training providers to make a fully informed decision about a learner's ability to become competent as a result of Essential Skills adjustments.
- Balancing the need to not disadvantage learners but not overcompensate the concessions offered and consequently diluting the competency of learners. The concern here was that it could potentially cause issues for both employers and certification bodies.

Proposal 3

To introduce a new section on degree and professional apprenticeships (levels 6 and 7), which will remove the essential skills requirements for apprenticeships at these levels.

Agree 27

Disagree 5

No response 2

One respondent whilst not categorically agreeing or disagreeing, provided a comment intimating they agreed on the condition that essential skills could be offered to degree and professional learners as an optional choice, should they wish to undertake it. On this basis, this has been interpreted as agreement.

Of the 27 respondents who agreed, several felt that the modification should also be applied to Higher Apprenticeships. The most common reasons cited were parity of esteem and that it would better support progression to year 2 or 3 of a degree apprenticeship.

Of the 5 respondents who disagreed, the most common reason cited was that essential skills should be included for all learners regardless of the level being undertaken.

Proposal 4

To enable apprentice frameworks to comply with an updated minimum as set out in updated SASW requirements, the minimum qualification credits within a framework must increase i.e. frameworks must now be a minimum of 38 credits (excluding Essential Skills credits).

Agree	24
Disagree	5
No response	3
Unable to respond	2

There were 2 respondents who felt unable to give an answer, stating further clarity was required regarding which frameworks would be affected.

Of the 24 respondents who agreed, a small number specified the frameworks and levels they felt the modification should apply to. There was also a comment regarding the potential impact on learners, educational institutions and industry and whether apprenticeship timeframes may be affected.

It should be noted that Clybiau Plant Cymru Kids Clubs, Play Wales and Playwork Education and Training Council Wales (PETC Wales), whilst broadly supporting the modification, had a concern regarding the unintended consequences for current qualifications that are on the current framework. They highlighted the latest Level 2 Diploma and Level 3 Diploma in Playwork which would become ineligible if the minimum 19 credits of knowledge and 19 credits of competency were to be applied. They proposed retaining 38 credits but not specifying the proportion of how this is comprised.

Of the 5 respondents who disagreed, their concerns were:

- Energy and Utility Skills highlighted an existing framework that would become ineligible, Level 2 Gas Network Construction Operations (Service Layer), which currently has just one qualification of 37 credits.
- Smaller sectors such as forestry may be unable to meet any potential cost implications and therefore this would have a detrimental effect on the apprenticeships they could offer. Cost implications was also noted by another respondent.
- There should not be a 'common size' of qualification across all levels of frameworks. Instead, the size of the qualifications/framework should reflect the practical elements needed to develop skills.
- A training provider commented that their qualifications, currently 37 credits, had been changed in 2023 and felt in their sector (food and drink manufacturing) they are already offering learning 'that provides the technical knowledge and understanding to include theoretical concepts through the qualifications'

Next Steps

This section will address respondents' comments and outline future plans.

Proposal 1:

In response to the feedback received for proposal 1, whilst we appreciate respondents highlighting potential proxies for other subject areas, the focus of our proposal is limited to those relating to digital literacy.

We acknowledge that due to the fast-paced nature of the IT/digital sector, there may be additional qualifications that may need to be added to the proxy list and we will continue to monitor and update this to ensure learners are not disadvantaged. Further to this, we will encourage the sector to remain cognisant of ongoing developments and to apply discretion where new evidence may be reasonably applied, when considering the validity of a proxy.

Proposal 2:

In response to the feedback received for proposal 2, we note there are some areas where respondents have asked for clarification and further information regarding competencies.

- **Timescales:** There is already flexibility within the timescale allowed to complete an apprenticeship, it is our expectation that employers and providers would continue to take a flexible approach to enable the incorporation of reasonable adjustments to allow a learner to successfully complete their apprenticeship.
- **Evidence and Competencies:** Within SASW, occupational competencies are defined as 'the competencies required to perform the skill, trade or occupation to which the framework relates at the level required in the framework'. Our expectation is that in delivering these, providers will work with both employers and learners to guide and advise them in all aspects relating to achieving these competencies including taking account any reasonable adjustments that may be required. Providers are responsible for (and must be committed to) using qualified professionals to assess the needs and abilities of individual learners and how their competencies can best be evidenced.
- We acknowledge the importance of ensuring the robustness of the evidence provided to maintain the standards required by both employers and certification bodies.

We would like to thank the Equality and Human Rights Commission Wales for their advice regarding the SASW Guidance Notes. These are intended to provide additional assistance for users and will have an updated Equality and Diversity section which will take into account of all three aims of the Public Sector Equality Duty.

Proposal 3:

In response to the feedback received for proposal 3, we can advise our intention is to evaluate the impact of removing the Essential Skills requirement from degree apprenticeships. Following this, we will then re-assess the situation regarding Higher Apprenticeships and whether it would be appropriate to extend the removal of the Essential Skills requirement to also include these.

We note that a minority of respondents felt Essential Skills should be retained for all learners. However, our rationale for their removal is that universities have their own entry requirements to ensure learners are able to successfully undertake a degree apprenticeship.

Proposal 4

In response to the feedback received for proposal 4, we would like to reassure respondents that we would not expect the credit values to change for existing published frameworks and pathways until the relevant sector review is undertaken. This will enable learners presently undertaking their apprenticeships to continue with the current framework credit values.

We are currently undertaking a series of sector pathway reviews which will be carried out in consultation with training providers, employers and sector experts. This process will allow us to capture any concerns and consider how best to address them. The first three areas under consideration are Creative, Early Years and Performing Engineering Operations (PEO) pathways.

We would like to stress that our objective is to improve standards for learners and employers. We want to ensure our apprentices are provided with a well-rounded programme that will result in them being confident, competent and capable individuals equipped with competitive and transferable skill sets.

List of Respondents

Agored Cymru
ALS Training
Anwyl Construction
Asda
Barratt Developments
Bart Anderson
Betsi Cadwalader University Health Board
Cambria
CITB Wales
Clwydalyn Housing
Clybiau Plant Cymru Kids Clubs
Colegau Cymru
Equalities and Human Rights Commission (EHRC) Wales
Energy & Utility Skills
Estyn
Federation for Industry Sector Skills and Standards (FISSS)
Forestry Skills Forum of England & Wales
Itec Skills and Employment
Manselton MOT Centre
Neath Port Talbot (NPT) Council
NPTC Group of Colleges (Neath, Port Talbot and Coleg Powys)
Playwork Education and Training Council (PETC) Wales
Play Wales
Pobl
Progression Training (2 separate submissions from 2 individuals)
Social Care Wales
The Insulation Assurance Authority (IAA)
Tony Leahy
Tony Sawyer
Tristan Funnell
University and College Union (UCU)
University of South Wales

Note: In addition one respondent wished to remain anonymous