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**Ymateb i Ymgynghoriad / Consultation Response**

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<b>Pwnc / Subject:</b>	<b>Modification of The Specification of Apprenticeship Standards for Wales (SASW)</b>

**Background information about Estyn**

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

Our 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<sup>1</sup> and the Education Act 2005. In exercising its functions, we 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 those receiving education and training in Wales;
- Quality of leadership and management of those education and training providers, including whether the financial resources made available to those providing education and training are managed efficiently and used in a way which provides value for money;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

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

We may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, we have 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.

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<sup>1</sup> This act to be replaced by the Tertiary Education and Research (Wales) Act 2022 when the quality provisions are commenced.

This response is not confidential.

## Response

### Introduction

We broadly agree with the proposals to widen the list of approved proxy qualifications and to include proxy qualifications for Digital Literacy. However, the proposals do not address our concerns that apprentices who have already attained proxy qualifications, and so do not undertake ESW qualifications during their apprenticeship, do not consistently have opportunities to further develop their literacy, numeracy or digital skills. We believe that such apprentices should continue to develop these skills when undertaking assignments, projects and workplace tasks.

We agree with the proposal to allow reasonable adjustments for learners with additional leaning needs.

We agree with the proposal to remove the requirement to attain ESW qualifications for learners undertaking degree and professional apprenticeships. However, we note that this proposal does not apply to learners undertaking higher apprenticeships at level 4 or 5 who may also have relevant degrees. We suggest that the proposal should have consistency across all apprenticeships and all levels. This could be achieved through clear proxy criteria at each level of apprenticeship. Learners should be expected to improve their skills with staff support through naturally occurring tasks and projects that are part of their apprenticeship and not stand alone pieces of work that are disconnect from the programme content and learning area.

We support the proposal to increase the minimum credits required from 37 to 38, although the evidence base presented in the consultation proposal is not strong.

Our response is informed by two recent thematic reports:

- [Delivery of Essential Skills Wales qualifications in apprenticeship programmes](#) (2023)
- [Higher Apprenticeships in work-based learning](#) (2018)

## Consultation questions

Question 1:

What are your views on widening the list of proxies for Communications and Application of Number and including proxies for Digital Literacy?

We agree with the proposal to recognise proxy qualifications for Digital Literacy. Our recent thematic report, [Delivery of Essential Skills Wales qualifications in apprenticeship programmes](#) (2023), highlighted the inconsistency of approach to proxies for ESW qualifications in apprenticeships frameworks, particularly in relation to Digital Literacy. The proposal would remove this inconsistency.

We agree in principle with the proposal to widen the list of approved proxy qualifications ([Annex 1](#)) on the grounds that this should reduce unhelpful assessment burden on learners who have already demonstrated competence at the appropriate level. However, the proposal does not appear to address the issues highlighted in our 2023 thematic report (above) and our 2018 report, [Higher Apprenticeships in work-based learning](#), in

relation to learners undertaking higher apprenticeships at level 4 or 5 who may have attained higher level qualifications (for example, degrees in English or IT). This affects a relatively small number of learners and could be addressed by adopting a consistent approach to guidance at all levels.

The proposal **does not** address a key area for improvement and associated recommendation identified in our 2023 report, namely that, 'while providers are effective in enabling learners to attain the ESW qualifications they need for their framework, learners who have already attained the required ESW qualifications or are exempted by proxy do not continue to develop their literacy, numeracy or digital skills consistently' (p.10). You may want to consider how apprenticeship providers could be encouraged to support this ongoing literacy, numeracy or digital skills development where there is no requirement for apprentices to undertake ESW.

Question 2:

What are your views on the proposed adjustments to Essential Skills requirements for learners with Additional Learning Needs?

We agree with this proposal. It is supported by the findings of our 2023 report, which reported that attaining ESW qualifications was a barrier to learners with additional learning needs achieving overall framework success (p. 11).

We would like to see clear guidance given to providers and learners regarding the possible adjustments that may be available to support them.

Question 3:

What are your views on removing the requirement to undertake Essential Skills for learners undertaking Degree and Professional apprenticeships?

We agree with this proposal, although as noted in our response to Question 1, we think it could also apply to learners with relevant degree level qualifications who are undertaking higher apprenticeships at level 4 or 5. We believe that the apprenticeship brand should be consistent throughout all levels, with clear criteria on how apprentices continue to develop their literacy, numeracy and digital skills. The proposal assumes all learners undertaking degree and professional apprenticeships have the appropriate skills.

Question 4:

What are your views on the change relating to increasing the minimum qualification credit from 37 credits to 38 credits (excluding Essential Skills credit values)?

It is not clear from the consultation document what the evidence base is for increasing the minimum qualification credit from 37 credits to 38 credits. Since many frameworks in practice require more credits than this, then this would not appear to be likely to have a substantial impact so we would support the change.