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27th September 2023

Mr. Paul Davies MS
Chair of the Economy, Trade and Rural Affairs Committee
Senedd Cymru - Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

Dear Mr. Paul Davies MS,

Subject: Concerns Regarding Changes to Apprenticeship Frameworks for Plant Operatives

I hope this letter finds you well. I am writing to you on behalf of Jones Bros. Ruthin (Civil Engineering) Co. Ltd, a leading civil engineering company based in North Wales. As the Chair of the Economy, Trade and Rural Affairs Committee in the Senedd, we believe you can help us address a pressing issue that has recently emerged in our industry.

Jones Bros has been a prominent figure in the field of civil engineering for several decades, and we have consistently invested in the development and retention of a highly skilled workforce. One of the cornerstones of our approach has been our commitment to apprenticeship schemes, which have played a pivotal role in shaping the careers of numerous individuals and supporting our operations.

Our apprenticeship programs have been integral to our ability to self-deliver many of our projects, as they enable us to grow a workforce of professionally qualified Engineers, Ecologists, Surveyors, Plant Operatives, and other professional support roles. Over the years, we have taken great pride in our training initiatives, including our 4-year Higher Engineer apprenticeship scheme and our Operative training scheme, which was formerly a Level 2 Plant Operative apprenticeship.

We have successfully delivered the Plant Operative Level 2 apprenticeship in-house at our accredited training centre for over a decade. This approach allowed us to train apprentices on various plant equipment within our facilities and according to our timeframes. These apprenticeships have been a crucial part of our strategy and have yielded excellent results.

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Registered in England and Wales: 00983459



Over the last 10 years Jones Bros has recruited more than 308 apprentices with an 87 to 90% completion rate.

One of the key points of concern arises from the recent decision by the Welsh Government to cease funding the Level 2 apprenticeship and transition to a Level 3 apprenticeship framework. While we understand the rationale behind this change, we are confronted with several challenges that need to be addressed.

Under the Level 3 framework, apprentices are required to attend 700 hours of classroom-based learning at college over three years, during which we would need to continue paying their wages. Unlike the Level 2 framework, which had no formal entry standards, the Level 3 apprenticeship expects learners to have a good basic understanding of English and Math. It is recommended that they develop further formal skills in these areas, such as Essential Skills or GCSEs.

Up until this point, our only requirements for prospective plant apprentices have been that they must be at least 18 years old, possess a valid driver's license, and be willing to work away from their place of residence.

The Level 3 apprenticeship does not require specific formal entry criteria. Nevertheless, on the City & Guilds Skills for Wales website, you can find information regarding Construction – Plant Operations Level 3, which outlines the following details:

“There are no formal English and maths entry requirements for these qualifications. But it is expected that learners will have a good basic understanding of English and maths. It is recommended learners develop further formal English and Maths skills, such as Essential Skills or GCSEs to support successful progression with this programme”.

Our experience indicates that a significant proportion of apprentices who successfully completed the Level 2 framework would struggle with the increased academic demands of the Level 3 apprenticeship. Many of these individuals might not even complete the Level 3 due to their difficulties with English and Math. Given our history with such applicants, we believe they would be reluctant to sign up for the Level 3 apprenticeship, making it challenging to maintain our previous recruitment numbers.

Moreover, the Level 3 apprenticeship extends the overall duration by almost a year compared to the Level 2, and the requirement for apprentices to spend over 700 hours in college further complicates our ability to run the program effectively, given the diverse and widespread nature of our projects across the UK.

Furthermore, we would like to highlight that the additional 700 hours of learning required in the Level 3 apprenticeship framework introduces learning objectives that would typically be covered at a much later stage in a civil engineering career, typically as individuals progress into site supervision roles. The standard entry level for personnel on civil engineering project sites is the Site Supervision Safety Training Scheme (SSSTS), followed by advancement to the Site Management Safety Training Scheme (SMSTS). The transition period between completing the Level 2 apprenticeship we had been delivering and entering into site supervision roles is vital. During this period, less academically inclined operatives have the opportunity to gain valuable hands-on experience on construction sites. This practical experience greatly enhances their chances of building a successful and fulfilling career in the civil engineering industry.

We believe that the shift to the Level 3 framework, with its focus on academic learning, could inadvertently discourage individuals who are more practically inclined from pursuing careers in civil engineering. It is

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essential to acknowledge the importance of practical experience in our industry and find a way to strike a balance between academic knowledge and on-the-job skills development.

In the third year of the Level 3 apprenticeship, apprentices must complete a practical project on all four machines within the apprentice framework. Each project requires an assessor to carry out two site visits, resulting in a total of eight visits per apprentice. Currently, we do not possess the necessary resources to handle this workload alongside the number of apprentices we employ.

Another significant challenge is the stipulation that Plant Operative apprentices must work over 51% of their time in Wales. With a decline in infrastructure investments in Wales, we are actively pursuing projects in England and Scotland, which inevitably reduces the number of projects where we can employ apprentices while still adhering to the 51% rule.

Our primary concern is that the practical implementation of the Level 3 framework appears to have been inadequately considered, leaving us with numerous unanswered questions regarding the future of the individuals we have been offering opportunities to for over a decade.

Considering these challenges, we kindly request your support in addressing the following issues:

- Revaluation of the Level 3 Apprenticeship Framework: We urge the Welsh Government to reconsider the move to the Level 3 apprenticeship framework for Plant Operatives considering the practical challenges it presents to employers like Jones Bros.
- Adaptation to Changing Work Opportunities: Given our expanded operations in other parts of the UK, we ask for flexibility in meeting the 51% working time requirement in Wales.

We kindly request your support in addressing these concerns and finding a way to ensure that the apprenticeship framework aligns with the realities of the civil engineering field. Your assistance in advocating for these necessary adjustments will contribute to the continued growth and prosperity of the industry while providing opportunities for individuals from diverse backgrounds to succeed within it.

Thank you for your attention to this matter, and we look forward to your response. If you require any further information or would like to discuss this issue in more detail, please do not hesitate to contact me at anthonym@jones-bros.com or 07768 375714.

Sincerely,



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