

**Senedd Cymru**

**Pwyllgor yr Economi, Masnach a Materion Gwledig**

**Ymchwiliad:** Llwybrau prentisiaeth

**Cyf:** AP19

**Ymateb gan:** Y Brifysgol Agored yng Nghymru

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**Welsh Parliament**

**Economy, Trade, and Rural Affairs Committee**

**Inquiry:** Apprenticeship pathways

**Ref:** AP19

**Evidence from:** The Open University in Wales



# Apprenticeship pathways

## Response from The Open University in Wales

### Introduction

The Open University in Wales welcomes the opportunity to respond to the Economy, Trade and Rural Affairs Committee's inquiry into apprenticeship pathways.

Throughout this response, we offer evidence, suggestions and reflections on the questions which the Committee is considering as part of its inquiry. Should the Committee feel that it would benefit from additional evidence from us, we would be very happy to provide this either in writing or by appearing to give oral evidence.

As part of its inquiry, the Committee will naturally consider the Review of Vocational Qualifications in Wales, chaired by Sharron Lusher MBE DL, which reported in July 2023, together with the Welsh Government's response. Our response to that review is submitted to the Committee, for its information, alongside this document.

These included the need for clear and easily navigable pathways, academic-vocational permeability, flexibility of learning opportunities, parity of esteem between academic and vocational learning, the agility and responsiveness of the current degree apprenticeship system, and the portability of qualifications.

Many of these points are reflected in our response to this inquiry because, in many cases, these issues have not been resolved.

The Committee may also wish to refer to our response to the Children, Young People and Education Committee's inquiry into routes into post-16 education and training, which offers some additional, relevant information. That response has been submitted to the Committee, for its information, alongside this document.

## **1. Pathways between apprenticeship levels**

While we understand why degree apprenticeship frameworks were limited to a select number of priority areas in the first few years of the programme, the Committee may now want to consider whether it would be beneficial to expand the number and variety of apprenticeships that are offered in Wales.

If frameworks are to be limited to such a small number in the medium and long term, that will undoubtedly start to cause problems for learning progression. In the current system, very many apprenticeships simply do not have a clear path to higher vocational learning.

Although sensible in the short-term, this is not indicative of a long-term approach to planning degree apprenticeships.

The Committee may also wish to consider the budget attached to degree apprenticeships. If frameworks are expanded, as we hope they will be, sufficient new funding must be made available to support these, and not simply redistribute, and thereby reduce, the funding for existing frameworks.

The Committee will reflect on the fact that the current degree apprenticeship frameworks are in areas that have historically, and arguably still are, dominated by men. This is shown in the Welsh Government's evaluation of the degree apprenticeship programme, published in February 2023<sup>1</sup>. The effect of this is that men are more likely to have clear pathways to degree-level vocational learning, while women are more likely to face barriers.

Our preference would be to see a system in which all learners can see a clear pathway to higher learning within their area, but which also affords sufficient flexibility for learners to move between different types of apprenticeship and different areas. We would also welcome increased vocational-academic permeability.

We appreciate that such a system cannot be delivered overnight but would welcome an indication from the Welsh Government that this is the direction of

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<sup>1</sup> <https://www.gov.wales/sites/default/files/statistics-and-research/2023-01/evaluation-of-the-degree-apprenticeship-programme.pdf>, para 4.11

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travel. The Welsh Government's most recent policy statement on apprenticeships commits to continuously reviewing and revising frameworks, but we are not aware that it has set out how this will be done or at what frequency.

We would also argue that, although we understand the focus on priority economic sectors, there is value in degree apprenticeships in a much broader range of areas. For exactly the same reason that higher education should not be focused on just those areas, we consider that degree apprenticeships offer more people the chance to learn at degree level who wouldn't otherwise be able to.

It is expected that Wales will need 400,000 more graduates by 2035 and that, by the same year, 95% of new jobs in Wales will be graduate level<sup>2</sup>. In this context, it should be clear that improving pathways between apprenticeship levels, up to degree level, across a broader range of areas is necessary.

The policy statement also makes reference to the role that Medr now plays in the broader tertiary education and training landscape, which we agree is an important one. However, we are concerned that too much onus may still be placed on institutions to work together to deliver new frameworks and pathways, if there are any. With that in mind, we suggest that Medr's role should be one of coordinating this work on a regional *and* national basis.

We also recognise that there is ongoing debate in England as to the scope of the Growth and Skills Levy. Should the Welsh Government consider implementing something similar in Wales, we would take the view that people who are already qualified to Level 6 should be eligible to receive degree apprenticeship funding.

While, of course, we understand the arguments about focussing funding and support at those who are not yet at that level, and the need to promote social mobility, this is not a long-term approach. In the long term, we will need more support for career changers, and degree apprenticeships must be part of this.

More people have degrees now than ever before, and many of these will be the very people who want or need to change careers one or more times throughout life. It does not appear to us to be sensible to make them ineligible.

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<sup>2</sup> <https://uniswales.ac.uk/demand-graduates-wales-set-soar-2035>

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This connects to a broader point about the scope of personal learning accounts, funding for which is not currently open to us. These are focussed at lower level learning, which, although important, does not necessarily help build a highly-skilled and highly-knowledgeable economy. We have some concerns about this developing trend that focusses on lower levels of learning, to the exclusion of higher and degree-level learning.

## **2. Economy**

The degree apprenticeship frameworks and pathways that are currently available have been chosen for the very reason that they support priority sectors. This is supported by the findings of The Open University's Business Barometer, conducted in partnership with the British Chambers of Commerce, over a number of years<sup>3</sup>. The most recent Barometer found that there were particular challenges with new technologies and net zero skills, and these are clearly reflected both in the Welsh Government's policy framework and in the degree apprenticeship frameworks that are currently available.

However, if we consider that a core purpose of degree apprenticeships is to address skills gaps, the Committee may wish to reflect on how agile the degree apprenticeship system currently is and to what extent it is able to respond quickly to changing skills needs. To our knowledge, it would take some two or three years to develop a new framework. In a sector such as digital, for example, that is an extremely long period of time, in which it is likely that the technology will have already moved on by the time the framework has been created.

We also note that degree apprenticeships, although different, still follow a traditional model of taking three or four years to complete. The Committee may wish to reflect on the possibility of creating a new model where learners are able to complete shorter qualifications that enable them to gain or update knowledge or skills and start applying them in the workplace more quickly than currently.

The current system does not provide an ecosystem in which providers are able to think about offering this kind of provision. In evidence to the Committee's predecessor committee in the Fifth Senedd, we noted that funding uncertainty year after year makes recruitment challenging<sup>4</sup>. This problem still has not been satisfactorily resolved.

Unfortunately, it is still the case that notification of funding is received late in the year. This necessarily impacts recruitment because, employers and potential

<sup>3</sup> <https://business.open.ac.uk/business-barometer-2024>

<sup>4</sup>

<https://business.senedd.wales/documents/s98039/16.%20The%20Open%20University%20in%20Wales.pdf>

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degree apprentices simply do not have the time to wait for funding to be confirmed and we cannot be expected to recruit at risk.

In the part-time undergraduate sector, there is recent evidence that if provision is not financially viable, it will not be offered. We are now at a point where part-time undergraduate provision at providers other than the OU in Wales has shrunk by over a third precisely because it has not been financially viable to deliver. If degree apprenticeships start going in the same direction, that will cause significant problems.

It is also the case that business depends on stability. We doubt that businesses would be able to invest in any meaningful way in a product that does not have long-term continuity. If there is a question as to which frameworks will be funded, and which won't, year after year, the long-term likelihood is that business will not invest its future resource and conduct its workforce planning with degree apprenticeships in mind. This is especially true of small and medium enterprises, which we know to be the backbone of the Welsh economy, making up over 99% of all active businesses in Wales in 2022.

The Committee may wish to consider how the Welsh Government, working with other authorities, might better incentivise and support small and medium enterprises to engage with and make use of degree apprenticeships, either with existing staff or when recruiting. This could include financial measures, as well as reducing the administrative burden on SME employers.

More broadly, we invite the Committee to consider the effectiveness of regional skills partnerships in informing policy and whether all RSPs are receiving as rich a set of data as possible. Note our concerns earlier in this response around the capacity of SMEs to contribute to data collection. In any case, we have some reservations about degree apprenticeship development relying too heavily on regional data and intelligence; we question whether Wales is really such a large country that this is necessary. We are eager to ensure that learners and potential learners aren't limited by what is only available in their region. Region-level planning is also challenging for us as a national provider, as we need to engage with all RSPs instead of just the one, but without any additional funding or capacity to reflect this increased work.

### **3. Employers**

We are concerned that the degree apprenticeship frameworks that are currently on offer are especially attractive to the small number of large employers, but difficult for small and medium employers to access.

Such employers who, as previously noted, make up almost all active businesses across Wales, do not have the time or resource to invest in building relationships with providers, feeding into regional data collection, or planning their workforce in the same way as larger enterprises.

We would suggest that there is an important role for Medr to play in coordinating and supporting all employers, including SMEs, to engage with learning providers and be informed about the opportunities and funding that are available. Medr also has an important role to play in developing a more collaborative culture to degree apprenticeship recruitment, such as in the case of one provider having filled all its places, signposting employers and prospective employers to other providers who have capacity. This would need to be reflected in the success metrics used by Medr in order to incentivise providers to behave in this way.

The Committee will observe that this would place additional pressure on learning providers who are already under considerable capacity and financial pressure. In England, a provider could approach a large employer and get 20-40 degree apprentices; with so few large employers in Wales, providers here need to build and maintain relationships with many more employers, and this requires resource. Medr would need to consider the implications of this.

## **4. Information about apprenticeships**

We would welcome the Committee's consideration of how degree apprenticeships can be incorporated into guidance from Progression Step 4 onwards. Early engagement in schools would help to build awareness and understanding of degree apprenticeships, alongside discussions about other pathways.

There is also a role for school and college settings to play in preparing young people for the workplace. We are starting to see this happen through the Curriculum for Wales, but we give our support to a much wider expansion of the use of work experience placements, employer engagement programmes, and essential employability skills development.

We are concerned that learners are not as aware as they could be of what the OU in Wales offers, and would ask the Committee to consider recommending a greater effort to promote all possible options to potential degree apprentices.

Anecdotally, it appears that provision of advice and guidance to prospective learners depends, at least in part, on the links that their college might have with employers and higher learning providers. As an all-Wales university, this means that we are at risk of being left out.

Equally, and as previously mentioned, SMEs simply do not have the time to build these kind of connections, which in turn leaves them at risk of not being able to take advantage of the opportunities that do exist.

Quite apart from the risk for the OU, it also means that learners are not being appraised of all the options that are open to them. We would like to see a system of high-quality and independent advice and guidance for learners which offers a breadth of information, not based on personal connections within a given region.

## **5. Equity of support and access for learners**

We refer the Committee to our earlier point around the potential gender bias of the current degree apprenticeship frameworks.

We also believe that there is a wider challenge in terms of making the connection between prospective degree apprentices, learning providers, and employers. We often receive requests from students who want to do a degree apprenticeship, but who don't currently have the right job or are not working. At the moment, there doesn't seem to be anywhere for people in this situation to go. We suggest that the Committee considers recommending a role for Medr, Careers Wales, or another organisation in helping to bridge this communication gap and perhaps help match prospective degree apprentices to jobs and/or learning opportunities.

We also refer to the terms of reference for this inquiry, in which it is suggested that respondents consider "the extent to which apprenticeship pathways are made open to all young people...". We challenge the premise of this question, which inadvertently reinforces the notion that apprenticeships and degree apprenticeships are only for young people. In fact, the Welsh Government's targets, although now delayed, have been around all-age apprenticeships. Indeed, in the economy of the future, more people will need to upskill and reskill, including through (degree) apprenticeships, at different points in life, not only after leaving school or college. We refer to our earlier point around the eligibility of people who already qualified at Level 6 to access degree apprenticeship funding.

## 6. Welsh Government's role

Throughout this response, we have included a number of actions that could be taken by the Welsh Government, Medr and others. These are listed below for ease of reference.

- We recommend that Welsh Government provide an indication of the direction of travel in terms of degree apprenticeship framework expansion.
- Should the Welsh Government look to extend the Skills and Growth Level to Wales, we recommend that learners who are already qualified to Level 6 be eligible.
- We recommend that Medr take a coordinating role, both on a regional and national basis, to providers collaborating on framework development and delivery.
- Should more SMEs start to use degree apprenticeships as part of their business and workforce planning, we recommend that Medr reflect the increased pressure this would place on institutional capacity.
- We recommend that Medr, Careers Wales, or another organisation play a role in helping to bridge the communication gap between prospective degree apprentices, learning providers, and employers.

### Contact

For more information, please contact:

**Cerith Rhys Jones, Senior Manager, External Affairs**

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# Routes into post-16 education and training

## Response from The Open University in Wales

### Introduction

The Open University in Wales welcomes the opportunity to respond to the Children, Young People and Education Committee's inquiry into routes into post-16 education and training.

Throughout this response, we offer evidence, suggestions and reflections on the questions which the Committee is considering as part of its inquiry. As a general point, while we understand that the Committee is concerned with the progression of pre-16 learners to post-16 education and training, we encourage the Committee to remember that supporting post-18 learners back into learning is equally important.

The Committee will be aware that the operationalisation of Medr is an excellent opportunity to improve access to learning, bring coherence to the system, and ensure that we have an education and training system that is fit for the future. There exist already some good examples of collaboration across the tertiary education sector, and we hope that Medr will be able to build on this so that it becomes more strategic, better coordinated, and, importantly, better funded.

Institutional autonomy is an important principle, but we take this opportunity to remind the Committee that if we as a nation want a comprehensive offer in which everyone has the opportunity to learn throughout life, then that must be coordinated, supported, and funded sufficiently by the Welsh Government through Medr.

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**1. Quality of information given to learners about the full range of post-16 options (vocational and academic routes post 16, i.e. further education, sixth form, apprenticeships and training, and onward to higher education)**

High-quality and independent information, advice and guidance (IAG) is crucial because our system remains one in which the decisions taken by pupils pre-16 have a significant impact on their future education and employment prospects.

Although more attention has been given to it in recent years, the provision of IAG continues to be a challenge. The tertiary education system is increasingly diverse, which is a good thing, but this also means that young people have to navigate an increasingly complex landscape.

We would also argue that IAG cannot and should not be limited to pre-16 learners. In a Wales of second changes, more and more adults are going to need and want to return to learning several times throughout life.

We would argue that this is positive and is characteristic of a nation where lifelong learning is valued. Alongside this, though, adults will need to be able to access IAG that reflects all of the options that may be available to them.

We would argue that the system as it stands is not set up to enable this to happen, or at least not to the extent that it should. We recognise at the same time that Careers Wales has limited resources and capacity and must prioritise its work.

We would welcome recognition of this by the Welsh Government, in terms of funding, and further believe that Medr has an important role to play in coordinating IAG across Wales.

## **2. How effective careers support is at compulsory school age**

As we are at the post-compulsory level, it is difficult for us to comment on these questions directly, but the Committee may find it useful to reflect on some lessons learned in our sector.

Our experience is that careers support, including work experience, can meaningfully encompass a much broader range of experiences than traditional placements. Indeed, providing a greater range of experiences can help to overcome barriers that learners may be facing.

For example, shorter and less intensive experiences, such as taster and insight days, can help to build confidence and dispel myths. Virtual placements and employer events are also important in this context.

Higher education providers have found that applied problems, e.g. a project brief submitted by an employer representing a real-world issue to which students can apply their skills and knowledge, can also be a useful curriculum tool.

All of these kinds of opportunities can be stepping stones towards more substantive experiences and be built upon as learners take decisions about their education and career paths. They can also be less resource-intensive and therefore a pragmatic option for employers delivering work experience opportunities at scale.

As noted above, it is also important to consider those aged older than 18. We know, for example, that some 53% of OU in Wales students are studying with us in order to advance in or change their careers, but almost the same proportion (46%) tell us that a lack of experience continues to be a barrier to career progression.

The economy of the future will need to be able to support people to change careers more than once, and so attention will need to be given to careers support not just at the pre-16 or pre-18 level, but throughout life.

### **3. Changes in routes post-18**

Data clearly show that there is a significant challenge in participation in higher education. Indeed, Wales has the lowest participation rate of all UK nations, and the gap between Wales and rest of the UK is now at its widest in 15 years. Data also show that there are even sharper declines among widening access groups and in the most underprivileged communities.

Unfortunately, data also suggest that the young people not entering higher education are not turning to other kinds of education, such as apprenticeships, instead; rather, they are becoming NEET.

Research undertaken by Universities UK indicates that, by 2035, 95% of new jobs in Wales will be graduate level and that Wales will need 400,000 extra graduates<sup>1</sup>. Further, we believe that a highly skilled, mobile, and agile economy requires there to be more people entering higher education. Increased participation in education also has many wider benefits that have been borne out in various pieces of international research, such as improved health outcomes, lower crime and improved social cohesion, and improved democratic participation.

In common with our colleagues throughout the higher education sector, we would welcome a continued focus on this challenge from both the Welsh Government and Medr, and efforts to work with us as providers to stem the tide of falling participation rates.

The Committee may wish to reflect on the fact that part-time higher education participation continues to grow. Although it can't be measured in the same way, because the higher education participation rate measures the proportion of 18-year-olds entering higher education whereas part-time participation is all age, we know that every year since the reform the student finance system in 2018, more and more people across Wales have chosen to study with us. Indeed, with over 16,000 students currently, we have experienced a 113% growth in undergraduate and postgraduate students since 2018. Strikingly, we have seen a 160% growth in widening access students, and 55% of new students are now from widening access backgrounds.

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<sup>1</sup><https://uniswales.ac.uk/demand-graduates-wales-set-soar-2035>

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We believe that this reflects a growing trend in learners' choices. Learning options that allow students to combine their studies with work and other responsibilities and learning that is more modular or bite-sized in nature are increasingly popular, and we believe that this trend is likely to continue into the future. For that reason, it is even more important to ensure that pathways are clear and that all options can be shown to learners so that those who may benefit from a more flexible approach can be identified before they are 18 years old and not pushed into routes that are unsuitable for them.

However, this kind of provision has been underfunded for a number of years to the point where most providers have withdrawn most of their part-time provision. The most recent data from HESA show that 51% of all part-time undergraduate students in Wales study with us and, without the OU in Wales, it is likely that part-time higher education would have fallen in the years immediately after the reform of the student finance system. At the same time, the remainder of the Welsh part-time undergraduate market has shrunk by almost a third since 2017/18. In that sense, we, and the type of provision we offer, have been central to achieving a key Welsh Government policy priority.

We understand that Medr is planning to review its funding methodologies and would welcome any efforts to better support part-time and flexible learning options, together with improved portability of learning and qualifications and more cohesive learning pathways at post-16 and post-18 level.

## **4. Welsh-medium provision**

As a pan-UK and international provider, much of our curriculum is shared and therefore delivered in English. We do, however, have a number of professional programmes, such as our Postgraduate Certificate in Education (PGCE) and Nursing programmes, that are directly funded in Wales and are delivered bilingually. We have also invested over a number of years in expanding our Welsh-medium content on our free online learning platform, OpenLearn.

More broadly, we are aware of the need to increase Welsh-medium provision across the country, and that, should the Senedd pass the Welsh Language and Education (Wales) Bill, there will need to be greater cohesion between pre-16 and post-16 education. In that context, we agree with the recommendations 8, 9, and 11 in the Committee's report on the Bill, and look forward to clarification.

We have also been consistent in saying to the Welsh Government, Medr and its predecessor body, and the Coleg Cymraeg Cenedlaethol, that expanding our Welsh-medium provision should require additional funding for that purpose.

## **5. Equity of access**

As noted earlier, data show that participation challenges in the higher education sector are particularly sharp amongst widening access learners and those in the most under-privileged communities. The Committee may also want to consider that while part-time higher education has continued to grow, the OU in Wales has seen particularly notable growth among those same groups (see widening access growth figures above).

We agree with colleagues across the sector that now is the right time to consider the role of the Seren programme, and to what extent it is helping to address the challenges that we are currently facing. We believe that there is a strong argument to realign the Seren programme to be more focussed on widening participation and access, rather than those learners who are already likely to enter higher education.

The Committee may wish to reflect on University Ready<sup>2</sup>, a project hosted by the OU in Wales but involving all higher education providers, which has been supporting young people who are transitioning to higher education with such things as study skills and life skills at university. This is an excellent example of a programme which supports access to higher education which could be aligned with other programmes, such as Reaching Wider. We believe that all of these kinds of opportunities and activities should be considered in the round.

On a separate point, the Committee may want to consider the fact that the OU in Wales is the only higher education provider in the country which serves all communities and has students in every single Senedd constituency, including the most rural. There are some excellent examples of how the OU in Wales has partnered with other providers and organisations in some of these areas to expand access to higher education in rural communities, such as our award-winning partnership with Powys Teaching Health Board, which we would be happy to provide more information about, should that be useful.

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<sup>2</sup> <https://www.open.edu/openlearn/education-development/university-ready>

## **6. Post-16 destination data**

Medr has a crucial role to play in ensuring that the right data is being collected at the right time, and that that data can be made sense of and used. We would welcome efforts to improve the transparency and availability of data to support decision-making and policymaking, both at the institutional level and more widely.

For example, at the moment we as provider don't have automatic access to learners' previous educational data, which means that it is difficult to track progress.

In response to an earlier question, we mentioned the need for increased portability of learning and qualifications and more coherent learning pathways. If these are improved, as we hope they will be, improved data will also be necessary both for the learner and for providers.

More broadly, we encourage the Committee to consider what 'post-16' really means in this context. Certainly, for the OU in Wales, our students study across the whole life course; in the future, it is our expectation that more and more people all across Wales will study at various points throughout life. If that does come to pass, we encourage the Committee to ask itself what the value is of 'post-16 data', and how the data landscape can accurately reflect these kinds of learning patterns.

We also suggest to the Committee that the concept of a 'destination' is perhaps becoming less relevant, as more and more learners up-skill, re-skill, and re-train at different points throughout life. That students and graduates are able to take time away from study or work, do something different, travel, volunteer, care for family, and return to study or work, is arguably a hallmark of a truly flexible system. So, again, we encourage the Committee to ask itself what the value is of considering a 'destination' in this context.

## **7. Welsh Government's role**

We have already made a number of suggestions both for the Welsh Government and Medr earlier in this response.

More broadly, we would argue that, although we have seen some progress and a lot of the right things being said, our system remains one in which learning is too linear and in which a disproportionate focus is placed on learning up to the age of 21, following the traditional pathways and model. We have outlined earlier in this response how this is misaligned with future learning patterns and the future economy.

We would welcome increased effort on the part of the Welsh Government and Medr to move at pace towards a system that is significantly more flexible both for the learner and for the provider, in which it is possible to stop and start learning and move up, down and between types and modes of learning, and in which the learner can see a clear pathways to ever higher learning with a given subject and between subjects.

We would welcome expansion of more alternative learning options, such as degree apprenticeships, and anything that Medr can do to encourage collaboration, reduce fragmentation, and bring coherence to regional and national policy around priority sectors.

Again, we also stress that all of the above should consider learners throughout life, and not just those who are around 16-18 years of age.

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Should the Committee feel that it would benefit from additional evidence from us, we would be very happy to provide this either in writing or by appearing to give oral evidence.

## **Contact**

For more information, please contact:

**Cerith Rhys Jones, Senior Manager, External Affairs**

Friday 2 December 2022

Sharron Lusher MBE DL  
Chair of the Vocational Qualifications Review Group  
Further Education and Apprenticeship Division  
Welsh Government

Dear Sharron,

**Re: Vocational Qualifications Review**

We are very pleased to be playing an active role in the Vocational Qualifications Review that you are chairing for the Welsh Government.

As you know, we are keenly interested in ensuring that the vocational qualifications on offer to learners in Wales meet their needs as well as the needs of communities, the economy, and the nation more broadly, both now and in the future.

In addition to our contributions through the review group itself, we wanted also to submit some written evidence for your consideration.

**Clear and easily navigable learning pathways**

Overall, our view is that there is currently a significant missed opportunity for learners to be able to move on from lower to higher level vocational learning. The principle that learners ought to have a clear line of sight to ever higher levels of learning is, in our opinion, vital to Wales' economic development.

At present, these pathways do not often exist. For example, those who undertake an apprenticeship cannot map a clear line of sight onto a higher-level qualification that they could undertake in the future such as a degree apprenticeship or other study at higher education level.

There is an opportunity now with the establishment of the Commission for Tertiary Education and Research to ensure that learners who study both academic and vocational

We welcome correspondence in Welsh and in English and corresponding with us in Welsh will not lead to delay.  
Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg ac ni fydd gohebu gyda ni yn Gymraeg yn arwain at oedi.

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qualifications alike have routes through to higher learning available to them and are supported on that journey.

There is also an opportunity to change our way of thinking, so that we are not talking about academic learning on the one hand, and vocational learning completely separately. Rather, we can think about how learners can move seamlessly between different kinds of learning opportunities, and to progress their learning continuously. That is precisely what lifelong learning should be, and the existence of clear learning pathways, and the embedding of a flexible approach across the system, is crucial to achieving it.

This is the vision that we all share, and which is encapsulated in the Minister for Education's own mission to make Wales a nation of "second, third and fourth chances." We all agree, I'm sure, that delivering that mission must include achieving parity of esteem between academic and vocational qualifications, as set out in the Programme for Government.

### **Parity of esteem**

While there has been some progress in recent years, there is more that could still be done to enhance parity of esteem between academic and vocational qualifications.

The creation of the Commission for Tertiary Education and Research presents an opportunity for academic and vocational qualifications to be planned and delivered in a holistic way so that there are equitable opportunities available for all kinds of learners and qualifications that meet Wales' current and future needs.

### **Effectiveness of the current offer**

The effectiveness of the vocational qualifications currently on offer is hampered by the prescriptiveness of the system. Learners report difficulty in moving between qualifications and, in turn, employers tell us that this generates learners who have not benefitted from the flexibility and the breadth of opportunities and experiences that they want and need.

In addition, the learning outcomes of some vocational qualifications are not responsive enough, in any case not quickly enough, to evolving industries. Indeed, employers tell us that by the time some learners have completed a vocational qualification, the learning criteria have become obsolete. This is, perhaps, most acutely the case in digital- and STEM-related qualifications.

Employers also tell us that learning criteria often do not map from lower to higher levels even within the level 1-5 bracket, and that challenge becomes especially true when also

considering qualifications above level 5. For example, there is no direct pathway from lower levels to a higher level in software engineering and data; indeed, we have often found that it is challenging seamlessly to progress vocational learners onto our degree apprenticeship programme.

The risk associated with this lack of clear pathways, as well as the significant focus of public policy on achieving lower-level qualifications, is that learners are encouraged to attain a particular level, for example a level 2 or 3 qualification, but then to go no further. In the long term, this will hamper the delivery of the Welsh Government's goal of Wales becoming a highly skilled nation, as set out in the Programme for Government, the Employability and Skills Plan, and the Economic Resilience and Reconstruction Mission.

### **The future of vocational qualifications**

Your review provides a golden opportunity to reiterate the importance of encouraging and facilitating learners to pursue ever higher levels of study. Higher learning brings enormous benefits to the nation as a whole and its economy, as well as to employers, individuals, and communities. In its current form, our system does little to encourage learners to undertake higher study and we would want to see action taken to address this.

We would also suggest that this review provides an opportunity to consider career education frameworks, where a person identifies a career/vocation and can see the learning route(s) to that career/vocation. Again, portability and flexibility would be crucial to this kind of approach. We would argue that this kind of approach would help with parity of esteem, where the focus is on the end goal rather than on the 'type' of learning (vocational, academic, etc.) being undertaken.

This kind of approach would represent a made-for-Wales system which serves learners, communities, and businesses well. It would be a proactive shift, not simply a response to the continuing roll out of T-Levels and winding up of BTECs in England.

### **Challenges and opportunities**

On the subject of T-Levels, it is worth noting that Wales has some particular challenges in respect of any Welsh version thereof: compared to England, we have much fewer multinational corporations who could support such a programme; the make-up of our further education sector is markedly different to that of England, including that it is, at least for now, centrally administered by government; and the industries in Wales that would have the capacity to support co-development are much smaller in number.

Challenges aside, we also have opportunities. We benefit from a much more collegiate culture in our education system. We benefit from being that much smaller and closer together – it is much easier to make connections and to move quickly. And we now have the Tertiary Education and Research (Wales) Act – an overarching legislative framework which has the potential to support us all in working together for the benefit of learners and of Wales.

As you know, that legislation creates the ‘approved Welsh apprenticeship’, which we think could offer another means to a solution. While much of the detail remains to be determined by regulation, we can imagine a position where there is available to learners in Wales a version of apprenticeship which strikes a balance between academic study and on-the-job learning more similar to the T-Level model, but which affords learners much more flexibility to combine different kinds of learning experiences, and whose development and delivery is tailored much more to the particular characteristics and needs of Wales and Welsh learners.

### Conclusion

That question is at the heart of our thinking around how our tertiary education system should work: what does Wales need, and what do learners need, now and in the future? We have now an excellent opportunity to co-design a system which provides learners with the opportunities they want and need, and which meets the needs of our communities and our economy.

We look forward to discussing this with you in our forthcoming meeting and would be happy to provide any further information as required.

We also look forward to continuing to play an active role as part of the Vocational Qualifications Review group, and in supporting the vital work that you are doing on behalf of the Welsh Government.

Yours sincerely,



Louise Casella FLSW  
Director, The Open University in Wales

We welcome correspondence in Welsh and in English and responding with us in Welsh will not lead to delay.  
Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg ac ni fydd gohebu gyda ni yn Gymraeg yn arwain at oedi.