

Scottish Apprenticeship Advisory Board (SAAB) Defining an Apprenticeship: Consultation

Energy and Utility Skills' response

The following six principles have been discussed and agreed by SAAB and will underpin our recommendations on the definition of apprenticeships in Scotland.

1. Apprenticeships and Employment

All post-school apprentices are employed.

Employer demand and employment status are fundamental to the success of an apprenticeship and are what clearly differentiates it from a 'training programme'. The apprentice must be employed in a genuine job and not solely for the purpose of delivering an apprenticeship.

- An apprentice must be an employee from the first day of their apprenticeship
- An apprentice must be paid at least a wage consistent with the law for the time they are in work and in off-the-job training
- The job role must provide the opportunity for the apprentice to gain and develop the knowledge, skills and behaviours needed to achieve their apprenticeship

This applies to all apprenticeships with the exception of Foundation Apprenticeships, which are delivered in the senior phase of school. They require significant work experience over a sustained period to satisfy the competence requirements for the award.

2. Apprenticeships and Occupational Pathways

Each apprenticeship is a programme of work-based learning designed to develop competence in a defined occupation and apprenticeship pathway.

To develop competence, an apprentice must be employed in a clearly defined occupation or job. Whilst generic or cross-sectoral skills - such as entrepreneurialism and business improvement – can enhance an apprenticeship and support development of a wider skill set, they do not develop occupation-specific competence.

3. Availability and Investment

Apprenticeships are available across a wide range of sectors where there is demonstrable industry demand. Apprenticeships can support the development of skills and competency across a wide range of sectors, including niche industries where employee numbers may be low, but are essential to retain specialist or traditional skills. There needs to be a strong business case for investing in developing frameworks.

4. Equality of Opportunity

Apprenticeships support equality of opportunity and are designed to ensure there are no unnecessary barriers to learning or assessment.

We firmly support the values of inclusion and diversity. We are committed to equality of opportunity within apprenticeships, and to ensuring that all individuals achieve their full potential, regardless of their personal characteristics, beliefs or experiences.

Each apprenticeship framework submitted for approval must provide information on the sector's employment demographics, actual or perceived barriers to access and measures to improve participation from under-represented groups. SAAB will work with partners to develop advice on approval criteria which identify any impact on different groups and provide options to mitigate against potential barriers.

5. Documentation

Apprenticeship Framework documentation is clear, accessible and in an easy to understand format.

Apprenticeship frameworks in Scotland are currently set out in long documents and include information such as registration, recruitment and selection and health and safety. SAAB will advise on how framework documentation can be reviewed to simplify the information for employers and stakeholders.

6. Relationship to Occupational and Professional Standards

Apprenticeship frameworks are based on occupational and integrate professional standards where necessary. They are designed to develop the apprentice's technical and wider skills.

Occupational and Professional Standards are critical because they define the skills, knowledge and understanding needed by an individual within a given industry to perform competently at a specified level.

They allow recognition and transfer of skills and competence across sectors and borders. Apprenticeships and their associated qualifications must reflect occupational, and where relevant, professional standards to maximise the value of the apprenticeship to employers and individuals.

Please provide any comments on these principles you wish to make:

- We support principles 1-6 and the emphasis on alignment between the Scottish and UK models.
- We are pleased to see that principle 3, 'Availability and Investment', recognises sector demand for apprenticeships and the need to target priority sectors across the UK.
- Principle 4, 'Equality of Opportunity', supports our sector's goal to expand our talent pool to all groups and communities, as set out in our [Energy and Utilities workforce Renewal and Skills Strategy: 2020](#). The energy and utility sector struggles with a lack of workforce diversity and is therefore failing to access the total breadth of talent available. 78% of the sector's employees are male, compared with 53% nationally, and just 6% are from a black, Asian or minority ethnic group. Evidence shows that

diversity within a workforce is vital in order to foster innovation: in a global survey conducted by Forbes, “85% of corporate diversity and talent leaders agreed that a diverse and inclusive workforce is crucial to encouraging different perspectives and ideas that drive innovation” (Forbes Insights (2011) Global Diversity and Inclusion – Fostering innovation through a diverse workforce). The measures proposed under principle 4 will support achievement of this goal.

- Principle 6, ‘Relationship to Occupational Standards’, sets out two important considerations. Firstly, alignment of Apprenticeships with Professional and Occupational Standards is key in terms of ensuring quality and consistency. These Standards establish that individuals have the skills, knowledge and understanding they need to perform competently and safely in our industries at a specified level. Gatsby and Energy and Utility Skills Transnational and Nations research found that employers believe existing standards (NOS) are fit-for-purpose, are valued, and are liked by energy and utility sector employers. That said, they also acknowledge that NOS need modernising and should be made more accessible. For example, National Occupational Standards could be utilised to identify the meta-competences required for roles in adjacent sectors, reducing the proliferation of frameworks.

Secondly, the integration of transnational standards into national apprenticeships promotes cross-border recognition and transfer of skills and competence. This is particularly important in optimising apprenticeship policy for Scotland’s major infrastructure-based employers, as many operate in more than one UK nation. The existence of uniform, transnational principles of competence for sector roles helps to minimise unnecessary operational costs and bureaucracy.

Defining an Apprenticeship: Principles for consultation

The following eight key principles are proposed by SAAB. Explanatory comments have been included to highlight some current practice and key issues.

When answering these questions, please take time to consider the potential impact for employees and individuals. The responses you provide will assist in further refining these principles.

Principle 7: Framework Design Process

The requirements of an Apprenticeship are set out in a framework document defined by industry which adapts to emerging and future needs.

Apprenticeships are designed for industry, by industry. To be fit for purpose, the process for designing the apprenticeship framework’s requirements must ensure that industry input represents the needs of the whole sector: from large multi-national companies to SMEs and micro businesses.

Framework design must also be informed by an understanding of the practicalities of delivery, therefore input is needed from other stakeholders such as Awarding Bodies and

Training Providers as necessary. The processes that support the development of frameworks need to be sufficiently flexible to respond to changing industry needs.

Q1 a) Do you agree with this principle?

- Yes
- No

Please give a reason for this answer:

The principle described above would allow stakeholders to ensure that the framework design process meets as wide a range of needs as possible. In particular, SAAB may wish to consider the following points.

During the framework design process, we would encourage SAAB to consider the impact that different aspects of the design might have on transnational employers and align at an early stage with the standards and frameworks in other UK nations.

This will enable Scotland and UK nations to access the best talent, without having to significantly retrain. Differences in apprenticeship frameworks between UK nations act as barriers to the transfer of skills and competencies and overall workforce agility and resilience for transnational employers. Ultimately, this can lead to employers incurring increased training costs and repetitive, unnecessary training for apprentices and workers.

SAAB may also wish to consider how existing National Occupational Standards could be used to identify the meta-competences required for roles in adjacent sectors, reducing the proliferation of frameworks and promoting the transfer of skills between sectors. This could go some way towards addressing skills shortages that exist in the energy and utility sector, and other adjacent infrastructure, engineering and construction sectors.

Q1 b) How can we achieve more involvement from employers, particularly SMEs, in developing the requirements for apprenticeships in their particular industry?

From our experience of developing apprenticeship programmes with employers right across the UK energy, utilities and infrastructure sector, we would recommend a multi-faceted approach to include:

- Working with lead and large employers to encourage and assist them to work with and engage their supply chain partners.
- Energy & Utility Skills also runs industry network groups and contractor groups which could provide useful fora within which to assist SAAB and explore these types of issues.
- Also, for critical sectors of the economy we would suggest mandating a certain number of SMEs to participate in the framework development process.
- SAAB should remain open to different sectors and apprenticeship levels requiring different models.

Principle 8: Qualifications and Pathways for Progression

Apprenticeships offer internationally recognised, accredited technical and professional qualifications, at SCQF levels 5 to 12, with clear pathways for progression.

In Scotland, mandatory vocational or degree qualification requirements are set at different levels for Foundation, Modern and Graduate Level Apprenticeships and these are accredited and recognised on the Scottish Credit and Qualifications Framework (SCQF). In some sectors, there is also a requirement to gain professional qualifications (for example, some financial services).

Generic or cross-sectoral skills can also contribute to a successful, robust and future-proofed apprenticeship system. For example, Modern Apprenticeships at SCQF Level 5-7 include five Core Skills³ which are deemed most likely to be needed in a work environment while Technical and Professional Apprenticeships at SCQF Levels 8-11 include Career Skills units, to reflect work based requirements at a higher level.

Careers Skills include units such as “Negotiate in a Business Environment” and “Promote equality of opportunity, diversity and inclusion in your organisation”. Other examples of generic or cross-sectoral skills could include project management, commercial awareness, analytical skills, and leadership.

Q2 a) Do you agree that all apprenticeships should include an accredited qualification?

- Yes
- No

Q2 b) Where specific professional qualifications are a mandatory requirement to operate in a sector, should they also be a mandatory requirement of the apprenticeship?

- Yes
- No

Please give a reason for your answers:

The reason we have stated ‘no’ for question 2a, is that employers should have the right or option to choose whether an accredited qualification is needed for the apprenticeship. The issue being that not all current qualifications are fit for purpose and for niche sectors they would need to be refreshed and brought up to date e.g. to reflect new technology developments and future industry needs.

Gatsby and Energy and Utility Skills Transnational and Nations research indicates that transferability across the borders is proving to be a hurdle for transnational employers and apprentices. This is due to variances in the apprenticeship system in Scotland and other devolved nations, which makes aligning apprentices programmes and transferability of apprentices difficult. Having an accredited qualification may exacerbate these issues for transnational employers as they will not only have to manage different apprenticeship

frameworks or standards but also possible qualifications making the system complex. Equally, if professional qualifications were standardised and used across the UK, this may make portability of apprentices easier.

Therefore, we recommend that further feasibility work is required on the impact of this policy on employers, apprentices and wider delivery stakeholders.

Q3 a) Should apprenticeship frameworks include additional units to support the development of generic or cross-sectoral skills?

- Yes
- No

Q3 b) If yes, what skills are necessary to apprentices to support their future career development?

Our recommendation is to include generic skills in all apprenticeship programmes such as employability, maths, English and digital skills as well as transferable cross-sector skills, such as risk management, asset management, data analytics, pricing and incentives, real time monitoring, contract management, stakeholder management, quality management, personal knowledge management and risk-based modelling (Energy and Utility Skills, Workforce Renewal and Skills Strategy: 2020)

Q3 b) If no, please explain why you believe this is unnecessary?

n/a

Q4 a) Are Core Skills still relevant for Modern Apprenticeships at SCQF Level 5-7?

- Yes
- No

Q4 b) If yes, should all Core Skills be separately assessed?

- Yes
- No

Please give a reason for your answers:

We consider Core Skills to continue to be relevant for Modern Apprenticeships. However, they must be integrated into the apprenticeship programme, at the appropriate level and need for the Modern Apprenticeship programme in question. Our recommendation for the future is to refine the existing assessment framework, with the assessment of these Core Skills only at a very minimum level, as this will ensure Core Skills do not become a hurdle to starting and/or achieving an apprenticeship.

Principle 9: Framework Content and Assessment

Each Apprenticeship framework describes the required content and method of learning and the associated assessment methodologies

In Scotland, competence is assessed throughout the apprenticeship and although some sectors consolidate learning through an end test or skills test (e.g. construction), there is no requirement for consolidation across all apprenticeships.

In other countries, there is a more blended approach. A report undertaken by SEMTA⁴ in 2017 reviewed the assessment approaches for apprenticeship systems judged internationally as being of high quality (Austria, Denmark, Germany, Switzerland and the Netherlands). All of the systems reviewed - apart from the Netherlands - require apprentices to pass written examinations as well as tests of their practical competence at the end of their training.

An end test will not be necessary for all sectors, but consolidation of learning can be important to ensure that the apprentice has gained the necessary skills, competencies and behaviours for that sector. Consolidation of learning can be applied through a wide range of methods including appraisal, 360 degree feedback and reflective accounts.

Q5 a) Should all apprenticeships in Scotland require consolidation of learning (such as end assessment, appraisal, review) as well as continuous assessment?

- Yes
- No

Q5 b) If yes, what methods to consolidate learning would be most useful and appropriate?

For the energy and utilities industry, consolidating learning would take the form of trade tests, practical observations, technical and competency-based interview, work log book, and practical assessment, that is to say via formative assessment. We therefore propose a combination of assessment forms, tailored to the apprenticeship programme. In the energy and utility sector a combination of end and continuous assessment works best.

Q5 b) If no, please explain why you feel this is unnecessary, stating any sector-specific relevance?

Principle 10: Common and Specific Elements

Each apprenticeship is designed to develop transferable skills across the sector.

There are over 80 apprenticeship frameworks across a wide range of sectors in Scotland, designed to be transferable within a sector, rather than company-specific.

Apprenticeship policy and the current model in Scotland should mitigate against apprenticeships which are too job or task specific, but there may be an opportunity to look at developing a core and options model. This would include core elements - common to all apprenticeships at that level within the sector – and specific requirements which reflect differing occupational pathways across the sector.

This could further support transferability of skills by combining common learning elements applicable to a range of jobs across the sector, with specific elements which focus on individual occupational pathways.

Q6 a) Is it desirable to introduce a 'core and options' approach to apprenticeships across a sector?

- Yes
- No

Q6 b) What challenges and opportunities might this approach present?

Introducing a 'core and options' approach will assist an apprentice to focus on and specialise in particular occupation areas of interest. At the same time, having completed core modules, there is the opportunity for the apprentice to transfer more easily within and across the infrastructure sectors. This will help to facilitate cross-sector and cross-border recognition and transfer of skills and competence. Plus, core modules are needed in the infrastructure sectors, such as energy and utilities, as apprentices must meet certain mandatory health and safety and regulatory competency requirements.

The main challenge with the 'core and options' approach is how SAAB will achieve the right balance of content and division between the two, at the same as ensuring comparability of apprenticeships at the same level. In the energy and utilities sector, and more broadly in the infrastructure industries, core modules may work best if they develop theoretical knowledge and understanding, whereas the 'option' modules focus on the practical application and contextualisation of the learning. Therefore, a clear framework and guidance are needed on applying the approach.

Overall, the key feature of the 'core and option' model is to provide flexibility and fluidity, so that industries are able to tailor training to meet emerging and future industry requirements, particularly where there are niche specialisms and where critical skills shortages need to be met.

Principle 11: Supporting the Apprentice in the workplace

Each apprentice is supported in the workplace by a trained mentor and in their learning and assessment by a qualified trainer/ educator/ assessor.

Mentoring is an important part of high quality apprenticeships. Mentoring can ease the transition into (or within) the workplace by helping young people to understand: their role in the workplace; how to contribute to the success of the business; and how to develop their own career pathway.

A recent study noted the benefits of mentoring to businesses, including improved communication between the apprentice and the employer and improved quality and relevance of the training.

Mentoring can be undertaken by a range of people such as: a dedicated mentor; a work colleague or peer support; or a training provider or assessor, depending on the size of the

business. Currently, while promoted as good practice, there is no requirement for apprentices to be allocated a trained mentor.

Q7 a) Do you agree with introducing a requirement for a trained mentor to support apprentices?

- Yes
- No

Please give a reason for your answer:

Our analysis, from the evidence we have collated through the Energy and Utilities Independent Assessment Service, indicates that apprentices with supportive mentors perform better overall in their apprenticeship programme. They are also more likely to achieve a distinction, rather than a pass or failure.

Q7 b) If yes, how can we ensure this requirement is met?

Our recommendations are:

- Employer recognition – existing apprentice employers will already have a form of mentoring programme in place; so, it would be helpful to recognise this in SAAB's positioning with employers.
- Employer guidance, recruitment and training – laying the foundations and developing the tools such as guidance for employers on roles and responsibilities of mentors - as well as ensuring that mentors are recruited and trained in time for the apprentice starts.
- Making it a requirement - by either including it in the inspection framework or making it a funding requirement, or a combination of both.

Principle 12: Type of Learning and Duration

Apprenticeship learning is work-based and delivered to fit the requirements of the apprenticeship framework, the needs of the business and the individual's pace of learning.

Off-the-job training

The key focus of apprenticeships is on work-based learning to develop competency, skills and knowledge, with the content of learning defined by employers to meet the skills needs of the sector.

Countries such as Germany and Switzerland, and more recently England, also mandate off-the-job learning in addition to work-based learning. Off-the-job learning is defined as learning which is completed outside of the normal day to-day working environment and leads towards the achievement of an apprenticeship. It is much wider than learning delivered in a training centre or college and can encompass activity such as simulation exercises, shadowing and industry visits. It must, however, be directly relevant to the apprenticeship add value.

In Scotland, off the job learning is mandatory only for those apprenticeships where industry specifically requires it (e.g. engineering). Some sectors specify formal off-the-job learning to deliver underpinning knowledge; others do not require taught learning but may deliver additional training outside the workplace or out with the apprentices' normal working duties. For some apprenticeships, there will be no off the job learning and all learning will be delivered on the job.

Q8 a) Should each apprenticeship in Scotland require mandatory off the job learning?

- o Yes
- o No

Q8 b) What would be the advantages and disadvantages of introducing mandatory off-the-job training for all Scottish apprenticeships?

- Introducing mandatory off-the-job training will ensure industry agrees the right level and fit-for-purpose training that is consistently applied to an apprenticeship programme. This will give employers confidence that 'x' apprenticeship is comparable and of the same quality, regardless of when and where the apprenticeship was taken.
- It enables consistent development of:
 - o core skills, understanding, knowledge and competency for the occupation area
 - o safety critical and awareness skills
 - o acceptable workplace behaviours
 - o an understanding of the tools and equipment use.
- If Scottish Modern Apprenticeships include mandatory off-the-job training, it would make alignment and transferability of apprentices across borders easier as apprenticeship programmes include similar or consistent features, particularly if aligned with the English model. To achieve this we would suggest that mandatory off-the-job training is defined by employers in the sector to ensure that it is fit-for-purpose.

Minimum Duration

There are set durations for Foundation and Graduate Level Apprenticeships.

Scottish Modern Apprenticeships have retained the original premise of ensuring flexibility to meet the needs of the employer and the apprentice, and thus only a few sectors mandate a minimum duration. There are some indicators of duration for Modern Apprenticeships: each framework does set out an estimated duration for the average learner and the number of SCQF Credit Points can also be used as a proxy to estimate learning hours. While these are a useful guide, they do not fully recognise how long it can take to consolidate learning, embed skills and develop competence in the workplace.

Other countries (including Germany and Switzerland) have a minimum duration for apprenticeship. It is recognised, however, that the apprenticeship and education systems in these countries are very different from Scotland.

A minimum duration may have benefits to both the apprentice and the employer, by giving the apprentice wider experience in the business and support to embed new skills.

An apprenticeship should include achievement of the mandatory components, enable the embedding of skills and competence and support the transition from being an apprentice to becoming a skilled worker.

Q9 a) Would a minimum duration for all apprenticeships in Scotland add value to apprenticeships in Scotland?

- Yes
- No

Q9 b) Should a minimum duration for each individual apprenticeship framework be defined and set by the sector?

- Yes
- No

Please give a reason your answers:

Apprenticeship duration should align with the English model of a minimum of 12 months, as this is based on international best practice. 12 months is the shortest timespan within which real value can be delivered for the apprentices and for employers, allowing adequate time for adaptation to a new environment in addition to achievement of the learning outcomes. It will also facilitate consistency and transferability for apprentices and transnational employers working across borders.

Minimum requirements may be determined by statutory, regulatory and legislative requirements. SAAB should consider the views of employers on the necessary duration of apprenticeship frameworks in order for the apprentices to be proficient.

Q9 c) If a minimum duration was introduced, how should duration be defined? For example, a set time period from the date of registration?

The duration should be defined in terms of a set time period from the date of registration.

Principle 13: Apprenticeship Agreement

Employer and apprentice roles and responsibilities are clearly set out in an apprenticeship agreement.

An apprenticeship agreement would be a standardised document, additional to the contract of employment, which sets out the relative roles and responsibilities of employers and employees during the completion of an apprenticeship.

Employers have a fundamental role in supporting apprentices' learning. Employer input and commitment is essential to ensure that the apprentice achieves competence in the role for mutual benefit. The role of the employer is to transfer skills, knowledge and experience to the apprentice and provide learning opportunities in the workplace and, if required, allow time away to undertake any off-the-job learning.

The apprentice should understand the content of the apprenticeship, and the learning required to successfully become competent and achieve the apprenticeship. They should also be able, and willing, to commit to the requirements of the apprenticeship. This can include, for example, attending courses, keeping records, contributing to the review process, undertaking assessments and keeping their employer informed of progress.

Q10 a) Would an apprenticeship agreement between employers and apprentices be a useful addition?

- Yes
- No

Q10 b) What roles and responsibilities should an apprenticeship agreement include?

The employer should:

	Yes	No
Sign a declaration confirming the apprenticeship	x	
Confirm the content of the apprenticeship and identify learning opportunities	x	
Understand what support they need to have in place to support the apprentice	x	
Other (please list)	Addition of maths and English Contract of employment	

The apprentice should:

	Yes	No
Sign a learning agreement which sets out their roles and responsibilities	x	
Confirm the content of the apprenticeship and requirements to meet learning outcomes	x	
Identify learning opportunities with the support of their mentor	x	
Other (please list)	Addition of maths and English Contract of employment	

Q10 c) Do you think employers or apprentices require additional support to meet the responsibilities contained within the agreement?

- Yes
- No

Q10 d) If yes, what support might be required?

Our recommendation would be to offer employers and stakeholders a 'how to' workshop, detailed guidance and agreement templates.

Principle 14: Quality Assurance

Apprenticeships are underpinned by robust quality assurance processes from design to delivery.

A range of organisations are involved in the quality assurance of apprenticeships, from the development of underpinning standards, and approval of apprenticeship frameworks, to the delivery of training. Each organisation has – and will continue to have - a distinct role, but there may be opportunities to share best practice and adopt more collaborative working. End-to-end quality assurance is currently under review by a SAAB working group. We are keen to look at how to further enhance and improve quality assurance processes and are interested in your views on this.

Q11 a) How can quality organisations work together to strengthen quality assurance in apprenticeships?

Our proposal is to set up a Quality Alliance, led by SAAB, to include all stakeholders and employers, to develop a quality framework and/or statement for the apprenticeship programmes which defines quality objectives, stakeholder responsibilities, quality indicators and measures to evaluate performance.

Q11 b) How can we embed equality into the principles of quality assurance to ensure that apprenticeships are fully accessible for all equality groups?

Equality can be embedded in the principles of quality assurance by including both qualitative and metric targets for equality groups.

Please use the space below to make any final comments.

We support the overall aims of both apprenticeship reform and the Levy, to bring new talent into the UK workforce. The sector is encouraged by the 14 proposed principles outlined in 'Defining an Apprenticeship'. We would like SAAB to consider the following points:

- Apprenticeship policy and approach should be encompassed within a wider national and UK workforce resilience and skills plan, so that labour sustainability and productivity is continually addressed. This is especially important in a post-Brexit Britain where new skills needs and gaps are likely to emerge and impact on GDP. Technical education policy should not be limited to just achieving the target number of apprenticeship starts. We therefore recommend that priorities should be set and aligned with critical skills challenges in sectors vital to UK productivity and growth, thus being demand-led and that this should therefore be incorporated into the principles.

- For instance, the energy and utilities sector faces critical skills and workforce renewal challenges. It is predicted that 221,000 vacancies will need to be filled during the next decade, brought about through the 100,000 existing employees who are set to retire, the 90,000 people who will leave to find new roles and the 31,000 new jobs being created (EUSG, 2016, Workforce Planning Research Results). In addition, in the sector the proportion of establishments reporting at least one vacancy has increased to a quarter (UKCES, 2015, Employer Skills Survey 2015: Scotland). These challenges are made all the more daunting by the difficulties the sector faces in filling vacancies with competent workers. The Employer Skills Survey: Scotland (2015) found that the proportion of vacancies that are hard to fill in the energy and utilities sectors due to a lack of skilled applicants, is 66%, which is higher than any other sector (average Scotland figure is 34%).
- In addition, we see clear strategic and financial benefits for Scotland, if SAAB aims for a 'joined-up approach', or alignment, between the four devolved governments. For transnational employers, it is essential that there is coherence between skills priorities and the work of these departments to ensure goals remain interconnected, relevant and achievable for prosperity and growth. We have an opportunity to try to align the apprenticeship programmes across the UK nations to enable transferability and workforce resilience. This will also provide an operating environment within which transnational employers can have the confidence to invest in apprentices. Therefore, alignment with the rest of the UK is vital, given the labour market operates across borders, and Scotland will need to access the best talent without having to retrain apprentices.