

Response to the Welsh Government consultation on aligning the apprenticeship model to the needs of the Welsh economy



Question 1 – How can apprenticeship progression be strengthened to provide clear routes into higher apprenticeships?

The National Deaf Children's Society (NDCS) Cymru is the national charity dedicated to creating a world without barriers for deaf children and young people. We support and represent the interests of deaf children and young people from birth through to independence. In referring to “deaf” we refer to all levels of hearing loss, including mild, moderate, severe, profound and temporary hearing loss.

We welcome the opportunity to respond to this consultation on aligning apprenticeships to the needs of the Welsh economy and our response will be from the perspective of the needs of deaf young people.

Deafness is not a learning disability and given appropriate support a deaf young person can achieve the same things that all young people aspire to: to do well at school, college, in an apprenticeship or at university and to build a career.

However, this support is not always in place and as a result deaf young people can face a number of barriers to achievement.

It is also true that young people who have learning difficulties or complex needs are more likely to have a hearing loss than the general population and that hearing loss might often be undetected.¹ It is important that their deafness is considered alongside any other needs.

Deafness affects individuals differently, but without appropriate support, deaf learners can be vulnerable to experiencing difficulties with skills such as:

- Listening skills: many deaf children and young people use assistive listening devices, which improve access to sound but do not restore “typical” hearing levels.
- Attention and concentration: communication in a hearing orientated society can require high levels of concentration from a deaf child/young person.
- Language development: without appropriate support, deaf learners can be prone to difficulties with language development.
- Literacy and numeracy skills: without appropriate support, deaf learners can face difficulties in developing literacy and numeracy skills.

¹ U. Hild, C. Hey, U. Baumann, J. Montgomery, H. A. Euler, K. Neumann (2008); Study: High prevalence of hearing disorders at the Special Olympics indicate need to screen persons with intellectual disability

- Self confidence: living in a hearing orientated society presents many challenges for deaf children and young people.

Deaf young people face substantial barriers entering into training and employment. Research conducted in 2007 into the employment experiences of severely and profoundly deaf people, found that at a time of near full employment, deaf people were four times more likely to be unemployed than the general population. Negative attitudes from employers were seen as the main barrier to getting a job.² Deaf young people are much more likely to be unemployed than hearing peers. If they do work they are more likely to be in semi-skilled or unskilled jobs.

Ensuring that deaf young people have fair and equal access to apprenticeships is essential to ensure improved long-term employment prospects.

Action on Hearing Loss in Northern Ireland has recently published a report on the transitions experiences of young people with hearing loss (Opening Doors).³ The research highlights many of the barriers that young deaf people face when embarking on training or apprenticeships. These include:

- Deaf young people not aware of their rights and the requirement for employers to make reasonable adjustments under the Equality Act 2010.
- Employers and training providers being unaware of how to access the support and funding available for deaf young people in the workplace
- Employers and training providers being unaware of the needs of the deaf young person
- Employers and providers being unaware of what reasonable adjustments should be made to support deaf young people
- Lack of awareness in young people of the different options available to them at 16, including apprenticeships

Supporting young deaf people into apprenticeships could be improved by better transition arrangements between school / college and apprenticeship provider.

Careers Wales works with all children and young people to develop a transitions plan and has specific guidance on working with young people who have a statement of special educational needs. Only a minority of deaf children and young people have a statement of SEN with most having support through Individual Education Plans (IEPs). There is a risk that the present transition planning process fails to take account of the specific needs of the majority of deaf young people. This means that many deaf young people miss out on vital support in this crucial transition period.

The imminent introduction of the Additional Learning Needs Reform Bill presents an excellent opportunity to support deaf young people into apprenticeships. The Welsh

² *Opportunity Blocked: The employment experiences of deaf and hard of hearing people.* RNID, London, 2007.

³ <http://www.actiononhearingloss.org.uk/news-and-events/n-ireland/news/new-research-report-on-transitions-for-young-deaf-people.aspx>

Government proposes that each child and young person with ALN from 0-25 years old will have an Individual Development Plan outlining the support that they need to access learning. The Welsh Government proposes that the IDP will apply in further education, but at the moment it does not intend to extend IDPs to apprenticeships.

NDCS Cymru believes this is a missed opportunity to support deaf young people in apprenticeships and we would urge the Welsh Government to reconsider.

The Opening Doors report makes several key recommendations that also have relevance in the Welsh context. These include:

- Ongoing deaf awareness training among training providers and employers.
- Ensuring that Access to Work resources are sufficient to cover deaf young people's support costs whilst on apprenticeships.
- Support is needed for young deaf people when they transition from training and employment programmes.
- A work mentoring programme which matches young deaf people with a mentor in the relevant career area – and which can provide ongoing support and advice – should be developed

We would urge the Welsh Government to consider these issues when developing the new apprenticeship model in order to support deaf young people taking this particular route to employment.

Question 2 – What delivery models would support expansion of higher apprenticeships, particularly in technical occupations?

Question 3 – Is the proposal to commence the completion of apprenticeship programmes at Level 3 the best way to achieve the objectives of: raising skill levels of the workforce; providing viable alternative education routes to university; and improving the economic benefit of investing government money in apprenticeships?

NDCS Cymru can see some merit in commencing the completion of apprenticeship programmes at Level 3. Too often teachers have low expectations of deaf pupils and there is an unfounded assumption that because a young person is deaf that they cannot achieve the same skill levels as their hearing peers. By starting apprenticeships at Level 3 deaf young people will not be guided onto lower level courses

where they will not be able to fulfil their potential. However NDCS Cymru has some concerns that getting rid of Level 2 apprenticeships without appropriate alternative provision could be harmful to deaf young people with additional or complex needs. We would suggest retaining the Pathways to Apprenticeships, adapting the Traineeships model or considering a 'supported internship' scheme, as set up in England, for young people with additional complex needs

Question 4 – How could Level 2 provision be delivered outside of the apprenticeship model?

Question 5 – To help inform our assessment of the possible impact of these proposals can you foresee any particular impact on those with protected characteristics (within the meaning of the Equality Act 2010) and how they might be particularly affected by these proposals?

See all answers above

Question 6 – What would be the impact of limiting government-funded apprenticeship places to employees in new job roles?

Question 7 – What would be the impact on employers and apprentices of moving the apprenticeship programme offer towards occupationally specific apprenticeships?

Question 8 – What issues have you encountered in relation to the delivery of Essential Skills Wales qualifications when apprentices already have comparable or higher-level qualifications in similar subjects?

Question 9 – Do you think that proxies for Essential Skills Wales qualifications should be accepted within apprenticeship frameworks?

Question 10 – Which qualifications do you believe that it would be reasonable to accept as proxies for particular Essential Skills Wales qualifications?

Question 11 – How can Welsh Government encourage an increase in demand for Welsh-medium apprenticeship provision?

Question 12 – What does the Welsh Government need to consider regarding the compatibility and portability of apprenticeships between the English and Welsh systems?

Question 13 – Are there aspects of the English reformed system which would further enhance the apprenticeship system in Wales?

The new system in England for supporting learners with additional needs extends to the age of 25. Learners have Education and Health Care (EHC) Plans that are adapted and modified as the learner progresses through school and into post-16 settings. Crucially, EHC plans apply to apprenticeships and can provide essential support for young people with additional needs.

Wales is in the process of introducing a new system to support learners with additional needs with an ALN Reform Bill expected in the summer of 2015.

Statements of Special Educational Needs and Individual Education Plans will be replaced by Individual Development Plans (IDPs) for all children and young people with additional needs from birth to 25. In our discussions with Welsh Government officials on the issue NDCS Cymru understands that there are NO plans for IDPs to include apprenticeships.

We feel that this is a missed opportunity to support young people with additional needs to access apprenticeships and would urge the Welsh Government to reconsider.

Please see the answer to question 1 for more information.

Question 14 – What would be the benefit of establishing employer panels to have a role in advising on the design and content of apprenticeships and informing demand annually at a sectoral level?

Question 15 – How could Qualifications Wales support the Welsh Government’s aim to be more responsive to employer need and ensure that the content of apprenticeships has a high degree of labour market relevance?

Question 16 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: