

Universities Scotland brief for the Stage 1 debate of the Tertiary Education and Training (Scotland) Bill.

25 September 2025.

Universities Scotland is supportive of two of the core objectives that the Tertiary Education and Training (Scotland) Bill is aiming to deliver, namely:

1. A simplification of the post-16 education and training landscape for the benefit of learners and employers.
2. The ambition to facilitate different approaches to apprenticeships and work-based learning with the aim of being more responsive to the skills needs of employers, the workforce and the economy.

There is an opportunity to deliver on both of those aims by building-in greater agility to the creation of graduate apprenticeships, as part of the transfer of powers signaled in the Bill.

The problem:

- Learners, employers and universities are all enthusiastic about graduate apprenticeships (GAs). However, the current “framework” process for the development and approval of new apprenticeships, situated within SDS, has proved to be unresponsive and overly bureaucratic, limiting the number of GA frameworks (to just 14 subject areas) and resulting in missed opportunities in Scotland’s skills landscape.
- The current operation of the framework approach for new GAs effectively prevents universities from responding with agility to meet obvious skills needs in the economy. Universities have had to work around the framework model, to their own financial detriment¹, in order to address skills shortages in town planning, (as an example) through new, work-based degrees which are effectively graduate apprenticeships in all but name.
- Working together but outwith the limitations of the framework approvals process, employers and universities have developed new work-based degree programmes from the point of identification of need to delivery within 7 months. Universities would like to deliver such programmes within the brand (and funding package) of a GA but that pace and agility is not replicable within the GA framework approach, as currently run. This needs to change.
- Restrictive processes apply to *existing* GA frameworks, not just the process to create new ones. For example, an employer might want to add an element of business skills to an engineering apprenticeship, but the current subject frameworks are so rigidly defined they currently prevent that. There have been instances where attempts to change the name of an existing apprenticeship, to better align with the career titles used in industry, is met with excessive bureaucracy.

¹ Only graduate apprenticeships, and no other form of work-based degree, are eligible for the SAAS fee of £1820 per student, per year. When universities respond to meet employer needs with a work-based degree but cannot do so within the GA framework model, the programme is underfunded from the outset.

The solution:

- There is an urgent need to reform the framework process for new and existing graduate apprenticeships. This doesn't need to wait for legislation; we'd want to see this progress immediately, in parallel to the Bill. However, the Bill's proposal to transfer responsibility for the framework model for GAs to the Funding Council and collocate it with GA funding makes sense and speaks to the goal of simplification.
- When coupled with the creation of a new apprenticeship committee in the SFC (as set out in section 17 of the Bill) this ensures that employers continue to have a strong voice in the creation and evolution of apprenticeships, but also creates the opportunity for the SFC to signal a clear re-set on a new, more dynamic framework process that will respond to emerging skills needs in the Scottish economy with agility, ensuring graduate apprenticeships thrive and supporting economic growth.

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