Universities Scotland response to Scottish Government consultation on statutory guidance proposals of the Scottish Funding Council's apprenticeship committee

Universities Scotland has responded to a consultation from the Scottish Government on the statutory guidance proposals of the Scottish Funding Council's apprenticeship committee. You can read the statutory guidance proposals on the Scottish Government website.

We share the Scottish Government's intention to see an increase in the number of graduate apprenticeships. Like the Scottish Government, we believe this requires more flexibility in the frameworks and in the associated processes.

Our overall comments on the guidance proposals are;

- One concern held by Universities Scotland is that the "as is" transition will restrict the current work that is underway and that ultimately the new arrangements may not deliver the change we need. We are concerned that because of the relatively lower volume of graduate apprenticeships, they will not get the time and attention that they need and deserve from the committee or the proposed sub-committees. This could be addressed (at least in part) by having a sub-committee specifically for graduate apprenticeships.
- We are aware of the First Minister's commitment to an increase in Graduate Apprenticeship opportunities during this parliament and that the advice and guidance as currently drafted may not support a sufficient pace of change to fulfil these commitments.
- Another concern is that this guidance is too prescriptive and will make it hard for SFC to change or evolve the committee in light of future needs. We suggest amending the wording so that it allows for more flexibility to allow for more agility in the future.

Looking at the current proposals, what we would like to see included is;

- At least one of the apprentices on the committee to be a graduate apprentice. It will also be important to support this individual (and any other apprentices on the group). We note the work of sparqs, which has a long history of supporting students on national committees relating to quality and learning and teaching and who would be well placed to help.
- To refer to foundation apprenticeships in the guidance and make reference to the definition in the act rather than the other way round (as in the current draft). This is because work-based learning is a widely used term across universities and colleges and beyond, where it does not have the specific meaning it does in the TET act. We are concerned this could lead

to confusion about the role of the committee. This could be avoided by referring to foundation apprenticeships.

- Include public sector employers such as local authorities and NHS in the committee and also to consider how to include views from third sector organisations. These employers are foundational for the economy as their services enable private sector growth. Arguably the current graduate apprenticeship list has been designed with only the private sector in mind – we note comments from a local authority attending the January roundtable on graduate apprenticeships who commented that they had had to make graduate apprenticeships fit for them rather than having graduate apprenticeships that fit their organisation.
- There is opportunity to streamline and remove duplication in quality requirements for graduate apprenticeships. Graduate apprenticeships are already subject to the rigorous quality requirements of the SFC's Tertiary Quality Enhancement Framework (TQEF) alongside all other degrees and credit bearing activity in universities.