

UVAC did not respond to the open consultation and [call for evidence](#) launched last year as part of Alan Milburn's review of *Young People and Work*.

On Thursday, 28 May a very well-considered [interim report](#) looking at the data and analysis was released. Our response to the interim report is this:

- We welcome acknowledgement of the failure of the school system alongside other factors affecting the early life chances of children and young adults.
- No policy commentator can ignore Britain's poor status amongst wealthy European countries of having the third-highest rate of 16–24-year-olds who are not in some form of learning or employment.
- UVAC believes that the workplace is an important and under-valued learning environment. UVAC champions the value of learning at and through work at all levels.
- However, there are real risks to a welfare and skills policy that ignores adult skills, commits to an absence of a higher-level skills strategy and fails to translate the meaning of 'lifelong learning'.

Other considerations for policy makers include the following recommendations:

1. Training our own workforce - The Migration Advisory Council should work with Skills England to determine where apprenticeships can be used to tackle skills shortages and an over reliance on migration. Nursing, where 27 per cent of National Health Service (NHS) nurses are from outside the UK, represents a good example. Nursing and health apprenticeships, including degree apprenticeships at level 7, should be used to train individuals of any age, to raise skill levels in the NHS workforce and tackle skills shortages.
2. Apprenticeships must remain an all-age programme - There is a current narrative that the apprenticeship / skills reforms have failed young people. Young people are important, but so too are individuals aged 25 and over. More needs to be done for young people but not at the expense of the existing workforce. 80% of the 2035 workforce are in employment in 2025. Skills policy must focus on individuals of ALL ages, if government is to deliver the growth agenda. Higher and degree apprenticeships must have a key role in developing the skills of the adult workforce. Government will not deliver its five missions or its industrial strategy by overly focusing apprenticeships on young people.
3. The Apprenticeship Levy is not working - Only 2 per cent of employer organisations pay the Levy. Public sector employers such as the NHS pay the Levy that is then used

to provide 95 per cent subsidies to train apprentices in non-Levy paying organisations. Government needs to reform the Levy so that the cost of training apprentices is shared more fairly by employers of all sizes, across all sectors and to ensure that the burden of the Levy is not unfairly carried by the public sector. Unions have called for the NHS to have its Levy payments ring fenced to ensure funds are protected and used to develop the skills of the NHS workforce and provide pathways to higher qualifications. Smaller businesses also need to spend more on training their employees. Increasing the scope of the Levy and the contribution paid by smaller businesses would mean more revenue is raised and the Government could introduce flexibilities to meet employer need. Government must also make a commitment that in future all funds raised from the Levy will be used to fund apprenticeships and approved training programmes.

- a. One cohort that many claim fared poorly because of the apprenticeship Levy and reforms are young people. However, apprenticeships taken by young people, defined as those aged 24 and under, still accounted for most apprenticeship places.
 - b. Organisations including the University Vocational Awards Council (UVAC), Association of Colleges (AoC) and Association of Employment and Learning Providers (AELP) have over the years questioned why employers, through a skills Levy, are expected to fund apprenticeships for 16-19-year-olds. 16-19 provision is compulsory education and the state funds the two other options, A levels (including Advanced Applied Qualifications) and T levels and soon to be V levels.
 - c. If the growth and skills levy continue like the apprenticeship levy to fund such provision (at the lower level particularly), along with new foundation apprenticeships and functional skills, many should question its name and purpose. It seems questionable why employers should be required to pay for provision to rectify the failure of 13 years of compulsory education, through a levy. Employers should spend more on training and development, but their contribution must be focused on the occupational skills needed to perform a job role.
4. The Government must be ambitious - By any measure there are too few higher and degree apprenticeships available to deliver the Government's five missions and industrial strategy. The Government needs to determine ambitious targets and develop and implement a strategy to boost numbers and make higher and degree apprenticeships a mainstream offer for both young people and adults. We would certainly not want to restrict the use of level 3 apprenticeships to train new plumbers, electricians, bricklayers and joiners for example. If sufficient new plumbers, electricians, bricklayers and joiners are to be trained we would, however, suggest that such apprenticeships need to be open to individuals of all ages.

5. Our argument is that apprenticeship should be focused and prioritised based on the skills shortages and occupations needed in the economy and to deliver effective public sector services, regardless of apprenticeship level or the age of an individual or the highest level of qualification already achieved. We need more high-quality apprenticeships in occupations needed by the economy and by the eight growth driving sectors. Prior to the Levy, apprenticeships for level 2 job roles in, for example, business administration and customer service dominated provision. Many of these apprenticeships were of questionable quality. The Levy pot is finite, and the issue is how to prioritise spending. Adopting this approach will mean that fewer level 2 apprenticeships are available for young people, although expanding Levy parameters to raise more funding will mean more types of apprenticeship can be supported. Our message is that an informed, evidenced based, debate is needed (through Skills England) and Government must then make decisions. We believe apprenticeship should be an all age, all level workforce development programme for the reasons we outline, others take a different view.
6. The prime minister's new ambition, for two thirds of young people to study to higher level (level 4 or above) – whether undertaking degrees, higher technical qualifications or apprenticeships – by the age of 25, could represent a genuine paradigm shift in how England approaches education and skills and in how HE responds. This has given UVAC an opportunity to explore what this will mean for HE, and crucially the role of universities and higher education providers working in partnership.
7. The risk for UVAC is that the three related policy issues skills, welfare and employment (including tackling NEET) dominate and suffocate a fourth policy issue for DWP, tackling shortages of skilled staff in key industries/priority sectors.

When looking at the cohort 'NEET' (probably one of the most ugly and misleading acronyms in education and skills) there is much complexity. Vanessa Wilson the CEX of mission group [University Alliance has launched a LinkedIn video](#) speaking about the higher education sector's response to the challenge by the P.M. about the value of degrees given the criticism that one in ten NEET have a degree.... but by implication that 90% do not. [Sammy Shummo, UVAC Board Director and Group Director of Apprenticeships at London South Bank University also makes a great case](#) for how HE can work as part of the solution to nearly one million children and young adults aged 16-24 who are not in some form of learning or work. Some commentators have described the group as 'LEET' (*looking for employment, education or training*) which is far more of a positive framing of the issue. However, with such a large proportion of this group not economically active (and by the very definition meaning a person of working age who is neither employed nor actively seeking and available for work) it is hard to find favour in such a description either.

Another dimension is the differences within the NEET group that speaks to age. The data suggest the surge is not from school and college leavers aged 16 and 17 (that often speaks to the lack of entry and first level job opportunities and employer recruitment practices) but from those aged 21 to 24. This contradicts the current policy moves for example, in apprenticeships, that is threatening the right of people to progress in and through work to higher paid careers and is cutting off the top of the work-based learning progression pathway. The rationale and existence of higher and degree apprenticeships have been hard won. There remain no strategies for lifelong learning, higher level skills or adults including adults in work. In UVAC's view the narrowing of provision creates a ceiling on how far individuals can progress. It signals and implies real higher learning still belongs in the traditional HE academy rather than the workplace or workspace being a site for learning, within which the learner is based and the richness of the learning opportunities available within it.