



# **Work-Based Learning (WBL) Equality, Diversity and Inclusion (EDI) Strategy**

## **2020 to 2026**

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## Vision Statement

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The Welsh Government's **contracted apprenticeship providers** aim to achieve an **inclusive apprenticeships programme** where current under-represented groups have equal opportunities to benefit by:

- Having flexibility ensuring that all individuals with a potential barrier can **access, participate and achieve** an apprenticeship.
- Apprenticeships becoming **a valued choice for all** as an ultimate goal and not merely an option for those deemed 'unsuitable' for academic routes.
- Creating a learning environment where everyone has the chance to go as far as their talent and hard work will allow; regardless of background, to make sure that apprenticeships are perceived to be for all; and remove **barriers to participation for all**.
- Ensuring that inclusivity drives apprenticeship providers' actions where all staff can ensure **a person-centred learning experience** and utilise this approach to support all apprentices.
- Enabling apprentices to see **what support work-based learning offers**, with continued input and feedback of the wider learning community.
- **Consulting with the community better and hearing from diverse apprentices** to assist with the review and development of practical support that **translates to sustainable and equitable outcomes for all**.
- Continuing to **create ways of increasing the diversity of apprenticeships**, and ensure our vision for inclusivity has wider endorsement from all apprenticeship stakeholders.
- **Building employer awareness** that disabilities, ethnicity or gender should not be a barrier in the workplace.
- Following the '**social model of disability**' and **look at what people can do**, not what they can't do – identify potential barriers and remove them accordingly.

This is an attainable vision **where employers and apprenticeship providers work together** to make apprenticeships **accessible, fair and inclusive**.

## Background

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Estyn's 2014 **Barriers to Apprenticeship**<sup>1</sup> report highlighted the challenges experienced by the Work-based Learning (WBL) sector in attracting **Black, Asian and minority ethnic**<sup>2</sup> and **disabled people** to apprenticeships, and in **addressing gender stereotyping issues** within specific industries. The report produced five recommendations for **work-based learning**, stating that **apprenticeship providers** should:

- Work more closely with schools, employers, community leaders and organisations representing Black, Asian and minority ethnic and disabled learners to improve awareness of apprenticeships.
- Work more effectively with local education providers and other agencies to make sure that valuable experience and resources are shared to support apprentices from Black, Asian and minority ethnic communities;
- Work with community leaders to identify community co-ordinators who will coordinate action to raise awareness of apprenticeships in the Black, Asian and minority ethnic communities;
- Make use of role models to promote apprenticeships in the community; and
- Work with the Welsh Government and awarding bodies to develop more awareness of the support available for delivering some elements of a qualification for disabled learners

In 2016, the **National Training Federation for Wales (NTfW)** secured funding from the Welsh Government. It established the **WBL Equality and Diversity Champion (EDC)** role to support apprenticeship providers to address the Estyn report recommendations.

NTfW's **initial internal review** of their equality and diversity practice revealed that Apprenticeship Providers (APs):

- Lacked the confidence to apply their knowledge of equality and diversity
- Required more in-depth knowledge of the social and cultural issues to understand the impact on disabled people and individuals from Black, Asian and minority ethnic communities to take up apprenticeships
- Required deeper understanding of how to apply reasonable adjustments to remove barriers for existing and future apprentices with additional support needs

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<sup>1</sup> [www.estyn.gov.wales/files/documents/Barriers%20to%20apprenticeship%20-%20November%202014.pdf](http://www.estyn.gov.wales/files/documents/Barriers%20to%20apprenticeship%20-%20November%202014.pdf)

<sup>2</sup> Preferred terminology agreed by the Race Equality Action Plan Steering Group, on the recommendation of the Welsh Government Specialist Policy Adviser on Equalities, Uzo Iwobi in December 2020

NTfW established the **Equality and Diversity Champion Programme (EDCP)** in 2016 to

- Deliver **specific equality and diversity training** to contracted and sub-contracted apprenticeship providers
- Serve as a vehicle for apprenticeship providers to **share equality and diversity good practice**
- **Identify practical solutions** to reduce the barriers to apprenticeships

#### **The EDCP included -**

- Bi-monthly Equality and Diversity Champion Group meetings
- WBL Equality and Diversity Training
- WBL Equality and Diversity Tool-kit
- Awareness Raising Workshops in Autism Spectrum Disorders, Disability, Dyslexia, Gender Lensing, Gypsy Roma Travellers, Hearing Loss and Impairments, Mental Health, Race Discrimination, Sight Loss and Impairments, Spina Bifida and Hydrocephalus
- Apprenticeship Engagement Events
- Community Engagement Activities around events such as - Black History Month, Disability Awareness Month, Mental Health Awareness Week, International Women's Day, Gypsy Roma Traveller History Month

The annual equality and diversity reviews<sup>3</sup> revealed that most values were placed on the EDC meetings, the work-based learning specific equality and diversity training and resulting toolkit as effective channels for sharing good practice and developing equality and diversity knowledge.

The EDC role was extended in 2018 to align to the lifecycle of the Welsh Government's **Apprenticeships Skills Policy Plan**<sup>4</sup> to become the **Strategic Equality and Diversity Lead (SEDL)** with an enhanced focus in driving up the sector's commitment to increasing the participation of individuals from protected groups on to an apprenticeship.

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<sup>3</sup> WBL providers undergo an annual review of their equality and diversity actions where details of their participation is recorded

<sup>4</sup> <https://gov.wales/apprenticeships-skills-policy-plan>

## Introduction

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This Equality, Diversity and Inclusion (EDI) strategy is for the Welsh Government's **contracted and subcontracted apprenticeship providers**, referred to as the **Apprenticeship Providers (APs)** in this document.

It is recognised within work-based learning that traineeships are considered an essential first step on a vocational route for young people who have barriers to employment and creates a potential pathway to apprenticeships. This strategy, however, relates to the **apprenticeships programme only**.

The APs **own** this strategy, yet critical to its success will be continued engagement and dialogue with the Welsh Government and external stakeholders that provide a gateway to diverse groups and individuals who want to take up apprenticeships.

Embedding equality, diversity and inclusion across apprenticeships provision will require a robust but flexible programme that takes account of regional challenges and **that equips APs** to respond to the needs and aspirations of apprentices in Wales, in a post-Covid and post-Brexit world.

This strategy received input from external stakeholders who as part of the former EDCP supported equality leads with their understanding of how to address disability, race and gender-related matters and the impact that discriminatory practice has on underrepresented groups to participate in apprenticeships. It builds on the collective efforts of the APs during the period 2016 to 2020 to address these challenges and create a more inclusive work-based learning environment.

## Methodology

The strategy themes, priorities and approach emanated from discussions with the:

- Work-Based Learning Equality and Diversity Champion Group
- Welsh Government Apprenticeship Unit
- Welsh Government Education and Lifelong Learning Statistics Team
- Equality and Human Rights Commission (EHRC)
- External stakeholders from third and public sector organisations

The main consultation period took place from March 2020 to September 2020 during the height of the Covid-19 pandemic through the online platforms of Microsoft Teams, Zoom, telephone meetings and email communications. The NTfW's SEDL coordinated APs' input and collated the written and oral responses to produce the final document.

The list of contributors is in Appendix D.

## Impact of Covid-19

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Covid-19 has proved devastating to work-based learning, with many apprenticeship businesses closed or significant numbers of learners affected by **furloughed industries**.<sup>5</sup> Covid-19 related research such as the **Black, Asian and minority ethnic Covid-19 Socio-Economic Sub-group report** <sup>6</sup> has indicated that the following groups will be disproportionately affected by the pandemic:

- Disabled people
- Individuals from Black, Asian and minority ethnic backgrounds
- Individuals from disadvantaged communities and backgrounds
- Women
- Young people

**Welsh Government's response to the report**<sup>7</sup> refers to this EDI strategy and the efforts deployed to **increase access to apprenticeships** of individuals from Black, Asian and minority ethnic backgrounds.

While Covid-19 related research predicts poor employment outcomes for the groups mentioned above, **priorities identified in this strategy remain to:**

- Increase the participation of individuals from Black, Asian and minority ethnic backgrounds
- Increase the participation of disabled people
- Develop greater gender balance across the apprenticeships programme to address male and female underrepresentation in certain sectors.

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<sup>5</sup> <https://www.bbc.co.uk/news/uk-wales-52940335>

<sup>6</sup> <https://gov.wales/black-asian-and-minority-ethnic-bame-covid-19-socioeconomic-subgroup-report>

<sup>7</sup> <https://gov.wales/covid-19-bame-socio-economic-subgroup-report-welsh-government-response-html#section-50761>

## Delivering the EDI Strategy

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The former Equality and Diversity Champion (EDC) programme centred on supporting APs to address Estyn's 2014 <sup>8</sup>report recommendations to increase the diversity and access to apprenticeships. While AP's participation was not mandatory, the programme successfully created a more knowledgeable hub of equality and diversity leads.

A five-year **Equality Diversity and Inclusion Programme (EDIP) accompanies this strategy** which sets out the actions and methods needed to achieve the EDI outcomes. This is a working document, drawn from work-based learning practitioners' overall experiences and challenges faced to increase participation of the priority underrepresented groups into apprenticeships.

Implementing the strategy requires a structured and coordinated approach to realising the vision of an equitable, diverse and inclusive apprenticeship offer. To reflect the renewed strategic direction, from March 2021, the EDC group will become the **Equality, Diversity and Inclusion Group (EDIG) who will meet quarterly**. Every third meeting will monitor and evaluate regional EDI performance ensuring the EDIP remains relevant, achievable, **or assessing whether interventions are required to meet** any specified targets.

### The EDI Strategy Aims:

The strategy aims to:

- **Provide** a framework for Apprenticeship Providers to develop policies and strategies that increases the participation of the priority underrepresented groups
- **Develop** equality and diversity practice of Apprenticeship Providers to effectively respond to the diverse needs of current and future apprentices
- **Monitor** progress towards achieving equality and diversity outcomes for apprenticeships
- **Assess** the impact of the EDIP on increasing participation of apprentices from disabled people, individuals from Black, Asian and minority ethnic backgrounds

### The EDI Strategy Outcomes:

- The Apprenticeships Programme reflects the diversity of Wales
- Apprenticeship Providers are skilled and equipped to support the needs of diverse learners
- Monitoring and evaluation systems reflect the key milestones of an apprentice journey
- Apprenticeships Programme remove all barriers for apprentices

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<sup>88</sup> [www.estyn.gov.wales/files/documents/Barriers%20to%20apprenticeship%20-%20November%202014.pdf](http://www.estyn.gov.wales/files/documents/Barriers%20to%20apprenticeship%20-%20November%202014.pdf)



## Responsibility for the EDI Strategy and EDIP

NTfW's Strategic Equality and Diversity Lead (SEDL) will produce the EDIP in conjunction with the APs and will be responsible for

- Driving and coordinating input
- Communicating progress on the EDI strategy outcomes to APs, the Welsh Government, and external stakeholders
- Reporting on the impact of the programme

**NTfW and the Apprenticeship Providers** will have responsibility for implementing this strategy and ensuring that the actions set out in this document are carried out. Additionally, quarterly meetings will take place with the Welsh Government in line with the SEDL quarterly claims to highlight and address potential risks to achieving the project outcomes.

The **Apprenticeship Providers' Strategic Managers and Equality Leads** are responsible for ensuring that this strategy is implemented and maintained within their work-based learning consortiums and equality teams. The quarterly **EDIG** meetings will record progress and ensure that all relative staff is fully informed about their responsibilities and any training and support they will receive in carrying out activities under this strategy.

The Apprenticeship Providers have a responsibility to ensure their actions comply with this strategy's requirements, namely to operate within the equality, diversity and inclusion context described in this document.

## Factors that may impact future access to apprenticeships

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Economic projections are that apprenticeships will play a vital role in the **Welsh Government's Covid-19 economic recovery plan**<sup>9</sup>. The **Regional Investment Framework for Wales (RIfW) Consultation Report by the Organisation for Economic Co-operation and Development**<sup>10</sup> (OECD) foresees challenges for regional investment models to address the economic disparities across Wales. RIfW programmes will be designed around the future-focused **Wellbeing of Future Generations (Wales) 2015**<sup>11</sup> where the wellbeing goals of achieving a **More Equal Wales** and a **Prosperous Wales** places apprentices at the centre of the learning and skills future landscape in Wales.

**Welsh Apprenticeship Frameworks**<sup>12</sup> move toward a career-focused model will bring new challenges for individuals with additional learning needs who want to access apprenticeships post-2021. The **Apprenticeship Issuing Authority for Wales Guidance**<sup>13</sup> for learning providers and apprenticeship key stakeholders outlines the new process to strengthen commissioning to ensure the apprenticeship frameworks are more accessible and informative to all relevant stakeholders.

The **essential skills element** required to complete a **Welsh Apprenticeship Framework** presents a barrier to some learners. Measures taken to address this challenge include modifications to the **Specifications of Apprenticeship Standards for Wales (SASW)**<sup>14</sup> **Framework** in 2016 which allowed for 'proxy' qualifications as recognised alternate to essential skills. In 2020 the Welsh Government introduced revisions to the apprenticeships eligibility criteria. Exceptions to the English and Maths minimum requirements are permitted for disabled individuals undertaking foundation apprenticeships and apprenticeships. How these measures impact on supporting disabled apprentices to complete their frameworks will be recorded and evaluated as a valuable determinant of developing an inclusive apprenticeship model.

In 2022, learners (aged 16 to 25) with additional needs will move to the new **Additional Learning Needs (ALN)**<sup>15</sup> system where an Individual Development Plan (IDP) will replace the Statement of Needs. The ALN Bill's provisions do not extend to work-based learning. APs will need to identify and apply additional learning support for apprentices at the point of access and need.

The **Curriculum for Wales 2022**<sup>16</sup> promises a flexible learning programme where schools are required to promote apprenticeships and provide more career focussed activities.

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<sup>9</sup> <https://gov.wales/driving-skills-and-employability-vital-wales-economic-recovery>

<sup>10</sup> <https://www.oecd.org/unitedkingdom/the-future-of-regional-development-and-public-investment-in-wales-united-kingdom-e6f5201d-en.htm>

<sup>11</sup> <https://www.futuregenerations.wales/about-us/future-generations-act/>

<sup>12</sup> <https://gov.wales/structure-welsh-apprenticeship-frameworks>

<sup>13</sup> <https://gov.wales/sites/default/files/publications/2020-05/apprenticeship-issuing-authority-for-wales.pdf>

<sup>14</sup> <https://gov.wales/sites/default/files/publications/2018-03/the-specification-of-apprenticeship-standards-for-wales-sasw.pdf>

<sup>15</sup> <https://gov.wales/additional-learning-needs-and-education-tribunal-wales-act>

<sup>16</sup> <https://gov.wales/curriculum-for-wales>

## The Strategic and Legislative Context

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### Strategic Context

This strategy supports the ambitions of the Welsh Government's **Apprenticeship Policy Plan**<sup>17</sup> and takes cognisance of supporting strategies that improve access to apprenticeships such as

- **Enabling Gypsy Roma Travellers**<sup>18</sup>
- **Asylum Seekers and Refugees Plan**<sup>19</sup>
- **Inclusive Apprenticeships: Disability Action Plan**<sup>20</sup>
- **Framework for Independent Living**<sup>21</sup>
- **Employability Plan**<sup>22</sup>

### Legislative Context

This strategy is not a 'tick box exercise'. Actions should demonstrate more than just compliance. Central to achieving **equity and equality of opportunity** for all apprentices will be how apprenticeship providers interpret and apply knowledge. The provisions of the below legislation underpin the EDI strategy commitment and approach

- **Equality Act 2010**<sup>23</sup>
- **The Wellbeing of Future Generations (Wales) Act, 2015**<sup>24</sup>
- **Gender Pay Gap (GPG) Duty**<sup>25</sup>
- **Additional Learning Needs and Education Tribunal (Wales) Bill**<sup>26</sup>
- **Socio-Economic Duty**<sup>27</sup>
- **Curriculum for Wales 2022**<sup>28</sup> (Implementation from September 2022)

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<sup>17</sup> <https://gov.wales/sites/default/files/publications/2018-03/aligning-the-apprenticeship-model-to-the-needs-of-the-welsh-economy.pdf>

<sup>18</sup> <https://gov.wales/enabling-gypsies-roma-and-travellers-plan>

<sup>19</sup> [https://gov.wales/sites/default/files/publications/2019-03/nation-of-sanctuary-refugee-and-asylum-seeker-plan\\_0.pdf](https://gov.wales/sites/default/files/publications/2019-03/nation-of-sanctuary-refugee-and-asylum-seeker-plan_0.pdf)

<sup>20</sup> <https://gov.wales/sites/default/files/publications/2018-11/inclusive-apprenticeships-disability-action-plan-for-apprenticeships-2018-21-1.pdf>

<sup>21</sup> <https://gov.wales/action-disability-right-independent-living>

<sup>22</sup> <https://gov.wales/employability-plan>

<sup>23</sup> <https://www.equalityhumanrights.com/en/equality-act/equality-act-2010>

<sup>24</sup> <https://www.futuregenerations.wales/about-us/future-generations-act/>

<sup>25</sup> <https://www.gov.uk/guidance/gender-pay-gap-reporting-overview>

<sup>26</sup> <https://gov.wales/additional-learning-needs-and-education-tribunal-wales-act>

<sup>27</sup> <https://gov.wales/socio-economic-duty-overview>

<sup>28</sup> <https://gov.wales/curriculum-for-wales>

## Achieving Equality, Diversity and Inclusion

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Keeping abreast of current EDI terminology and related legislation is vital to ensure this implementation is sensitive to the social and cultural barriers that impact the priority groups. The equality definitions and terminology used in this document are informed by the **Equality and Human Rights Commission (EHRC<sup>29</sup>)** and recognised equality organisations involved in current EDI discourse and combat discrimination, prejudice and social injustice.

**Equality** is about ensuring people have equal access and opportunities and are treated fairly within equality legislation. The **Equality Act 2010**<sup>30</sup> provides that individuals who experience discrimination and unfair treatment receive protections by law. Apprentices have **employed status**; consequently, they are covered by the Equality Act 2010.

**Policies, practices and procedures** must prevent apprentices and staff from being **treated unfavourably** or **discriminated** on the grounds of their race, gender, disability, age, religious belief, sexual orientation, gender reassignment, pregnancy and maternity or marriage and civil partnership.

**Diversity** is about respecting and **valuing difference** in individuals. A workplace approach to diversity should recognise, value and manage difference in individuals, **positively strive** to meet individual's different needs, and **acknowledge all the characteristics** that make one individual or group different from another.

**Inclusion** involves not only **recognising and accommodating difference** but being **flexible in offering choice** for individual apprentices. Inclusion is about understanding the complexity of individuals' interactions within the apprentices' workplace environment and how they can participate in all aspects of their framework.

### Black, Asian and minority ethnic

Black, Asian and minority ethnic is the preferred terminology by governments and public sector organisations when referencing ethnic minority groups in the UK. From December 2020, the correct terminology, which has been adopted Welsh Government-wide, is:<sup>31</sup>

- In Welsh Government communications, use the term **Black, Asian and minority ethnic**<sup>32</sup> in the first instance.
- In further instances within the same communication, use the term **ethnic minority communities**.
- Until otherwise instructed, avoid the use of the acronym '**BAME**'.

The above recognises that there are multiple communities with different cultures and needs.

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<sup>29</sup> <https://www.equalityhumanrights.com/en/equality-act/equality-act-2010>

<sup>30</sup> <https://www.equalityhumanrights.com/en/equality-act>

<sup>31</sup> Preferred terminology agreed by the Race Equality Action Plan Steering Group, on the recommendation of the Welsh Government Specialist Policy Adviser on Equalities, Uzo Iwobi in December 2020

<sup>32</sup> <https://gov.wales/govwales-style-guide>

## Disabled

This strategy uses the term disabled people which is the preferred term offered by disability rights organisation **Disability Wales**<sup>33</sup>. The Equality Act 2010 defines disabled as an individual having a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities.

This strategy recognises the **Social Model of Disability**<sup>34</sup>, which identifies that environmental, organisational, and attitudinal barriers disable people and prevent their full participation in society, **not** their medical conditions or impairments.

The term disabled is not an all-encompassing word to define individuals who have long-term health conditions or impairments. Some apprentices may not consider themselves disabled; however, may require additional learning support.

## Gender Equality, Gender Mainstreaming and Genders Stereotyping

This document refers to **male** and **female** regarding increasing their participation in apprenticeship industries where they are underrepresented. In this context, the aim is to expand males and females' choices and challenge the notion of '*jobs for men*' and '*jobs for women*'. **The European Institute for Gender Equality (EIGE)**<sup>35</sup> defines **gender stereotyping** as 'preconceived ideas whereby females and males are arbitrarily assigned characteristics and roles determined and limited by their gender. Individuals may self-define themselves in non-binary terms. Efforts should ensure the individual does not experience discrimination because of how they self-identify.

**Gender Mainstreaming**<sup>36</sup> is considered an effective strategy to realise **gender equality**<sup>37</sup>. The EIGE defines it as involving integrating an organisation or business' design, implementation, evaluation and monitoring of policies and business functions to achieve equality for men and women.

**Gender Equality** is about the equal rights, responsibilities and opportunities of women and men and girls and boys. This strategy aligns with the principles of **Gender equality which extends to all females, males and non-binary** people to achieve equality of outcome for all<sup>38</sup> to address the gender balance in male and female-dominated apprenticeship sectors.

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<sup>33</sup> <https://www.disabilitywales.org/home/>

<sup>34</sup> <https://www.disabilitywales.org/social-model/>

<sup>35</sup> <https://eige.europa.eu/>

<sup>36</sup> <https://eige.europa.eu/gender-mainstreaming/what-is-gender-mainstreaming>

<sup>37</sup> <https://eige.europa.eu/thesaurus/terms/1168>

<sup>38</sup> <https://chwarateteg.com/projects/gender-equality-review/>

## The Current Situation

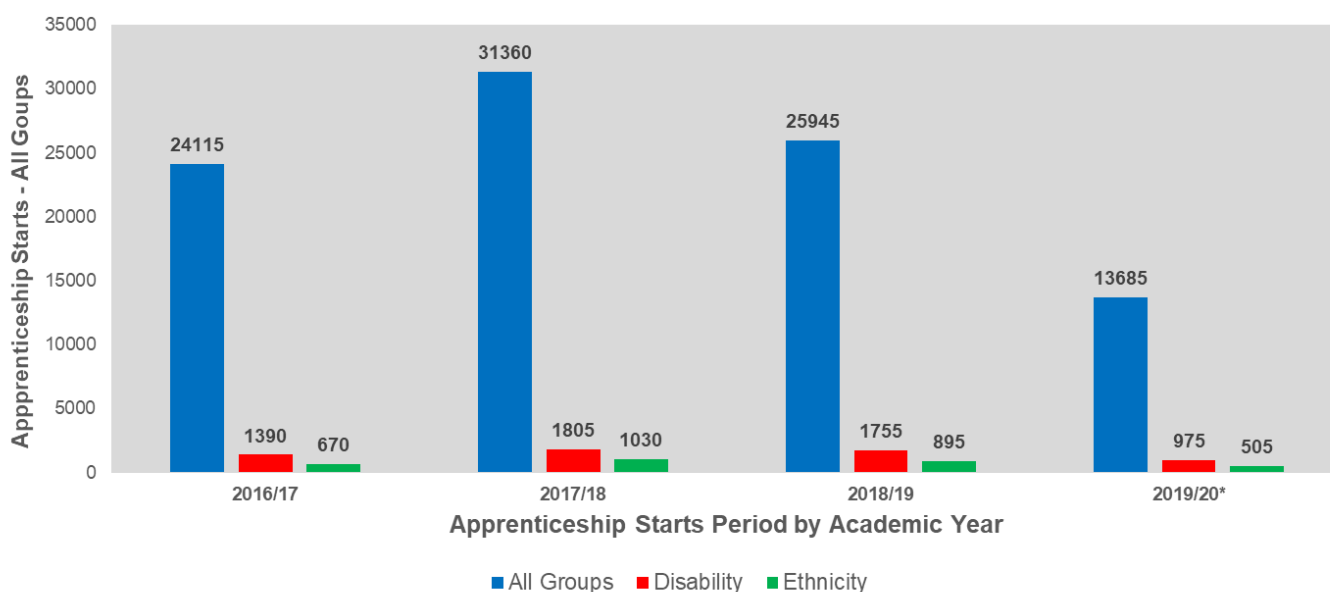
At the time of writing, the **Lifelong Learning Wales Record (LLWR)** <sup>39</sup>data shows that from 2016/17 to 2019/20 Quarter 2 period there are **95105** apprenticeship unique starts. Indications are that the Welsh Government’s 2016 manifesto pledge of creating 100,000 apprenticeships starts will be achieved by the end of its five year tenure in 2021. The main apprenticeship starts above all other sectors, however, continue to be **Health and Public Services, Business Administration, Construction and Engineering**.

The table below shows that females dominate the Health, Public Services and Business Administration sectors, and the majority of male apprenticeship starts are in the Construction and Engineering industries.

Industry Sector	Total Starts into sector	Male Starts	Percentage Start	Female Starts	Percentage Start
Business Admin	1825	590	32%	1235	68%
Construction	1910	1815	95%	85	5%
Engineering	1525	1430	94%	80	6%
Healthcare and Public Services	4620	735	16%	3880	84%

The chart below shows that the percentage of apprenticeship starts from disabled individuals has increased from **5.8% in 2016/17** to **7.1%<sup>41</sup> in 2019/20** and individuals from Black, Asian and minority ethnic backgrounds from **2.8% in 2016/17** to **3.7% in 2019/20**.

Apprenticeship Starts by Disability & Ethnicity  
Comparison data from 2016 to 2020 (Q1 & Q2)



<sup>39</sup> <https://gov.wales/lifelong-learning-wales-record-llwr>

<sup>40</sup> <https://gov.wales/statistics-and-research>

<sup>41</sup> <https://app.powerbi.com/view?r=eyJrIjoieTYlYlZmUwNGQzMzZmNS00ZjVklWE0YTMTMTcxMDkwYzVmMWM4IiwidCI6ImE0YTZmOGZmLTJlZjU0tNDBkOC1iMDJkLTliM2UyYmIwYmRkNCJ9>

The data shows an encouraging increase in disabled and Black, Asian and minority ethnic apprenticeships' participation over the defined four-year apprenticeships start period. The numbers, however, rely on apprentices' self-declarations. Additionally, anecdotal evidence from APs reveal a reluctance from learners to disclose their ethnicity and that learning support given to some apprentices is not always recorded. The published start numbers of these groups, therefore is questionable.

Addressing the gender balance of specific apprenticeship industries is challenging and will require a long term co-ordinated approach involving employers across all sectors to achieve significant change. The Trade Union Congress (TUC) research links the **Gender Pay Gap (GPG)** to differences in the sectors in which males and females take up apprenticeships. They assert that choices are often based on occupational stereotypes of '**traditional roles**'<sup>42</sup>. The UK's public sector **Gender Pay Gap Duty** <sup>43</sup>review similarly reveals persistent gender pay gaps and occupational segregation related to ethnicity and disability. While employers are currently not required to report disability and ethnicity pay gaps, the **TUC**<sup>44</sup> and **Chartered Institute of Personnel Development (CIPD)** <sup>45</sup>call for a **Disability Pay Gap** and **Ethnicity Pay Gap** reporting to become a legal requirement. This situation may change as the TUC finds that these pay gaps are invariably linked to unlawful discrimination, structural barriers and negative attitudes<sup>46</sup>.

Additionally, the Welsh Government has commenced its **Socio-Economic Duty**<sup>47</sup>, requiring specific public bodies to consider how their strategic decisions reduce inequalities associated with socio-economic disadvantage. Whereas there is no reporting required, the duty does apply to Welsh Government Minister's business functions. It may require targeted efforts to ensure apprenticeships are accessible to individuals in these socio-economically disadvantaged areas.

The Equality Diversity Inclusion Programme (ECIP) that accompanies this strategy outlines three **specific engagement projects** around disability, ethnicity and gender which aims to challenge perceptions of apprenticeships, reduce access barriers and provide solutions to increase participation levels.

With this current situation and cognisance of the duties mentioned above, the following section focuses on how the Apprenticeship Providers will address these core challenges to increase participation of disabled people and individuals from Black, Asian and minority ethnic backgrounds and achieve a greater gender balance in the main apprenticeship industry starts.

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<sup>42</sup><https://www.tuc.org.uk/sites/default/files/Apprenticeships%20gender%20inequality%20booklet%20%283%20web%29.pdf>

<sup>43</sup> <https://www.gov.uk/government/publications/understanding-the-gender-pay-gap-within-the-uk-public-sector>

<sup>44</sup> <https://www.tuc.org.uk/news/tuc-calls-government-make-employers-report-their-disability-pay-gaps>

<sup>45</sup> [https://www.cipd.co.uk/Community/blogs/b/policy\\_at\\_work/posts/why-ethnicity-pay-gap-reporting-has-to-be-introduced](https://www.cipd.co.uk/Community/blogs/b/policy_at_work/posts/why-ethnicity-pay-gap-reporting-has-to-be-introduced)

<sup>46</sup> <https://www.tuc.org.uk/sites/default/files/2020-11/Disabled%20workers%20note.pdf>

<sup>47</sup> <https://gov.wales/socio-economic-duty-overview>

## Increasing Participation

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Increasing **participation of the Apprenticeship Providers (APs) and individuals who want to participate in apprenticeships** is the cornerstone of this strategy.

This strategy recognises the need to address regional situations and challenges to ensure full participation in all aspects of the EDIP. As a minimum, APs should commit to participate in the following **core activities**:

- Attendance at the EDI Meetings
- Undertake EDI Training
- Submission of Case Studies
- Participation in Apprenticeship Engagement Events

The above activities formed the basis of the former Equality Diversity and Champion (EDC) Programme. They were deemed valuable in developing AP's equality and diversity practice and raising awareness of the barriers that affect entry into apprenticeships. Overall AP participation was high, with an average 88% attendance at EDC meetings achieved. There is, however, a need to support APs who operate in isolated areas and are limited by organisational capacity, to participate as fully as possible. Online delivery provides a more accessible medium to support participation and will be essential in implementing this strategy.

**Increasing participation of underrepresented groups into apprenticeships** will require engagement with a range of partners, including working with schools, **colleges**<sup>48</sup> and parents as important career influencers. Additional Learning Needs (ALN) Centres to promote opportunities for all individuals who want to become apprentices. Understanding what **transitional support** is available for individuals with **additional learning needs** who enter apprenticeships from their statutory institutions is crucial to ensure appropriate support for these particular apprentices at the **point of access and need**.

**Case studies** are ideal for APs and employers to present positive stories of achievement and demonstrate what support is available throughout an individual's apprenticeship journey. Additionally, identifying **ambassadors** from former apprenticeship alumina can promote the programme to diverse groups and show what career options are possible through apprenticeships.

**Third sector organisations** play an important role in brokering access to groups underrepresented in apprenticeships. They can be critical allies to improve and promote the apprenticeships offer to their respective members and communities of interest.

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<sup>48</sup>Only applies to lower level apprenticeships (essentially Levels 1 to 5) and does not apply to Degree apprenticeships



Organisations such as **Chwarae Teg**<sup>49</sup>, **Remploy**<sup>50</sup>, **Ethnic Minority and Youth Support Team (EYST)**<sup>51</sup> deliver Welsh Government-sponsored programmes that offer training and career development services for disabled people, Black, Asian and minority ethnic groups and Women into STEM roles respectively. Additionally, APs can draw on the following Welsh Government initiatives to expand a package of support for learners and promote an inclusive apprenticeships agenda.

- The government's **Access to Work Scheme**<sup>52</sup> which provides practical support and advice to people with a health condition or disability to overcome barriers to enter or stay in work
- **Working Wales**<sup>53</sup> delivered by **Career Wales** is a free advice, guidance and training access service for individuals to help them into employment or further their careers.
- **Additional Learning Support Fund**<sup>54</sup> created as a top-up for providers to fund specific tools or support for individuals with additional learning needs.
- **Apprenticeship Vacancy Service**<sup>55</sup> which includes information and guidance for disabled individuals who want to become apprentices
- **Colegau Cymru's Additional Learning Needs Transformation project**<sup>56</sup>, is funded by the Welsh Government to support colleges as they prepare for the implementation of the Additional Learning Needs and Education Tribunal Act (ALNET)

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<sup>49</sup> <https://chwaraeteg.com/>

<sup>50</sup> <https://www.remploy.co.uk/remploy-cymru>

<sup>51</sup> <http://evst.org.uk/>

<sup>52</sup> <https://www.gov.uk/access-to-work/eligibility>

<sup>53</sup> <https://workingwales.gov.wales/>

<sup>54</sup> <https://gov.wales/additional-learning-needs>

<sup>55</sup> <https://careerswales.gov.wales/apprenticeships/what-is-an-apprenticeship>

<sup>56</sup> <https://www.colleges.wales/en/page/additional-learning-needs>

## Equality Diversity Inclusion Programme Projects

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The central focus of increasing participation of apprenticeships will be the continued engagement of external stakeholders including employers and critical allies. For instance, the EHRC's '**Is Wales Fairer**'<sup>57</sup> and Estyn's '**Partnerships with employers in secondary and special schools**'<sup>58</sup> reports that call for APs to set and meet '**equality and diversity participation targets** and **improve apprenticeships' promotion in schools**' respectively, requires a measureable response that demonstrates progress.

Addressing these challenges will require cooperation with our apprenticeship stakeholders to realise positive changes in perceptions, attitudes and behaviours to ethnicity, disability and gender across the apprenticeships programme.

The EDIP, therefore, will deliver **three specific engagement projects** where each project will include:

- **case studies** identifying role models/ambassadors to promote apprenticeships to diverse communities and individuals
- **a roundtable discussion** event identifying the factors behind disability/ethnicity non-disclosures and barriers to apprenticeships and actions for increasing participation
- an **apprenticeship careers development event** outlining apprenticeship opportunities in particular in Business Administration, Construction, Engineering, Healthcare and Public Sector industries
- a **Project Evaluation Report** outlining lessons learned, recommendations for follow-up actions to achieving the project outcomes

### Disability Engagement Project Rationale

Participation of disabled people into apprenticeships has increased from 5.8% (2016/17) to 7.1% (2019/20). This increase is welcomed but more is needed to continue this trajectory. This improvement was realised through the suite of actions, measures and policies originating from the **Inclusive Apprenticeships: Disability Action Plan 2018-2021**<sup>59</sup> which included setting an annual 1% performance target for Apprenticeship Providers (APs) in 2019.

That plan was co-designed and endorsed by specialist disability organisations that demonstrated a useful tool to showcase employers' positive recruitment stories and outline the economic benefits of employing disabled people. We believe that the practical actions enacted have been the driving force behind the positive changes over the past few years.

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<sup>57</sup> <https://www.equalityhumanrights.com/en/publication-download/wales-fairer-2018>

<sup>58</sup> <https://www.estyn.gov.wales/thematic-reports/partnerships-with-employers-5>

<sup>59</sup> <https://gov.wales/sites/default/files/publications/2018-11/inclusive-apprenticeships-disability-action-plan-for-apprenticeships-2018-21-1.pdf>

This model of engagement and co-production will be fundamental to the project to source new ways to address persistent barriers and access to apprenticeships for disabled people.

The annual 1% performance target will also remain and monitored and reviewed throughout the project.

### **Black Asian and minority ethnic Engagement Project Rationale**

In broad terms it is recognised that Black and Asian minority ethnic people are under-represented in apprenticeships. The percentage of learners from Black, Asian minority ethnic backgrounds in 2019/2020 was 3.7% which compares to 5.5% of the general population of Wales. In recent years there has been an encouraging trend as the number of apprentices from a Black, Asian minority ethnic backgrounds has increased from just 2.8% in 2016/17. The full extent of the COVID crisis will have on these numbers going forward is not fully known but Covid-19 related research predicts poor employment outcomes for BAME.

Within these headline figures there are certain factors to consider:

- Ethnic minorities tend to be concentrated with certain geographical areas of Wales with populations varying considerably from 1.7% in Wrexham to 19.8% in Cardiff.
- Ethnic minorities tend to be more represented within certain economic sectors.
- It is uncertain as to whether Ethnic minorities always declare their ethnic backgrounds maybe because of the fear of discrimination.
- The figures above are based on 2011 census data and it is thought that the numbers in 2021 will have changed significantly from 10 years ago.

Taking these factors into account it is felt that a specific project initially focussing on engagement then actions and making changes to drive up participation would be appropriate to inform setting an appropriate participation target. The strategy sets out engagement with Black, Asian and minority ethnic people, apprenticeship providers, employers, apprentices and other stakeholders to establish the best actions and changes to ensure equality of opportunity and outcome for individuals from Black Asian and minority ethnic backgrounds who want to access apprenticeships

The project will draw on the shared experiences and knowledge from APs and Black, Asian and minority ethnic groups to ensure that the Equality Diversity Inclusion Programme (EDIP) aligns appropriately to regional situations and addresses learners' needs and concerns. As set out in the strategy, we will be monitoring and reviewing progress over time to assess effectiveness of this approach including appropriateness of targets.

### **Greater Gender Balance Project Rationale**

The starting premise for the project is the current data. Apprenticeship frameworks in Wales currently attracts greater participation from females (61%) than males (59%)<sup>60</sup>.

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<sup>60</sup> <https://www.learningandwork.wales/2019/02/21/the-latest-analysis-on-women-in-apprenticeships-supporting-women-into-work-and-diversifying-the-workplace/>

Over the period 2016-17 to 2019-20, female starts into Construction and Engineering have remained around 5% and 6% of the total apprenticeship starts respectively. Conversely females dominate Business Administration, Healthcare and Public Sector with 68% and 84% of females choosing these sectors respectively. Research shows there are contributing factors that female career choices, in particular such as self-confidence, finances and bullying in the workplace<sup>61</sup>

We understand there is also gender segregation in other sectors, but the issue is particularly significant in these chosen sectors. Working collaboratively with employers to build understanding of the barriers that exist for males and females to enter 'perceived' non-traditional sectors will be valuable project outcomes towards achieving greater gender balance across the apprenticeships programme.

Focussing efforts in this way, will enable us to assess the impact of the actions taken to consider what might be appropriate and work best in other sectors.

This project supports the Welsh Government's aim to develop a Gender Mainstreaming strategy for the Apprenticeship Programme to identify how to achieve better outcomes for males and females underrepresented in these main apprenticeship industries.

## Employer Engagement

It is recognised more is needed to support employers in their equality and diversity practice. APs should feel confident they have the necessary skills and capacity to achieve the targets deemed appropriate to this strategy's success and that their employer networks can also subscribe.

**Monitoring and benchmarking** against the core programme activities is necessary to show progress towards increasing the diversity of apprenticeships.

### Apprenticeship Providers will:

- **Monitor and evaluate provider participation** through annual equality and diversity reviews which will reflect the level of engagement in the programme and specific activities to attract under-represented groups in their respective regions
- Extend the EDIP equality and diversity training to employers, where appropriate
- Deliver **three specific projects** focusing on disability, ethnicity, and gender to demonstrate increased participation into apprenticeships from disabled people, individuals from Black, Asian and minority ethnic backgrounds, and gender balance across Health and Public Services, Business Administration, Construction and Engineering industries underrepresentation of males and females.

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<sup>61</sup> <https://www.youngwomenstrust.org/research/the-real-cost-of-apprenticeships/>

## Training and Development

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Apprenticeship Providers (APs) must continue to develop systems and practices around equality and diversity. This strategy aims to support APs with a robust but flexible training programme to meet their needs and those apprentices who may require additional support to complete their frameworks.

The **Equality Diversity Inclusion Learning and Development Plan**<sup>62</sup> will underpin APs' equality and diversity practices to equip APs with the knowledge and skills to address learners' changing needs. The LLWR shows that the number of apprentices self-disclosing they are disabled, dyslexic, or Autism Spectrum Disorders (ASD) increases. There are challenges in responding to learners who experience discrimination on the grounds of their race, disability, and gender, which impacts the numbers of apprentices from Black, Asian and minority ethnic backgrounds who disclose their ethnicity.

Apprentices should feel confident and safe to disclose if they are disabled or have any other issues that may impact their learning so that the appropriate support is in place at the point of access or when needed. Strengthening relationships with equality organisations and external stakeholders who can provide expert training on **sensitive topics such as unconscious bias, racism, or gender identity** will benefit the sector.

There are also crossovers with the EDIP and the work of **the Head of Work-based Learning Quality**<sup>63</sup>, whose role is to support all WBL providers to share good practice, co-ordinate quality improvement and encourage excellence across the work-based learning sector. Covid-19 has proved the catalyst to the universal shift to virtual learning, but it has also shone a light on pockets of communities across Wales who experience digital exclusion<sup>64</sup>. Not all learners thrive through these platforms, so developing accessible skills is essential to support those apprentices who struggle to learn solely through online delivery.

### Apprenticeship Providers will:

- Continue to develop equality and diversity knowledge and recognise that new skills may be required to respond to the changing needs of learners
- Work with the Head of Work-based Learning Quality to be equipped with the necessary skills and knowledge to develop accessible learning skills to support apprentices who struggle with the online mediums.
- Link with other equality and diversity practitioners to offer specialist training in topics identified as necessary to improve EDI practice.
- Participate in training on related strategies, legislation that impacts on the EDIP delivery and outcome.

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<sup>62</sup> This role is employed by NTFW and funded by the Welsh Government. The specific WBL Equality and Diversity plan to be developed as part of the EDI strategy

<sup>63</sup> <https://www.ntfw.org/projects/quality-head-of-work-based-learning-quality/>

<sup>64</sup> <https://www.goodthingsfoundation.org/research-publications/how-covid-19-changed-digital-landscape>

## Monitoring and Evaluation

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Data recording and monitoring have proved increasingly crucial in identifying how and when interventions are needed to address participation trends. Capturing key milestones that demonstrate the apprentices' journey (beyond the initial apprenticeship start) and progress towards the EDI strategy outcomes can provide a useful benchmarking tool to encourage good practice across apprenticeships provision.

The **Apprenticeships in Wales Report 2018**,<sup>65</sup> directed APs to increase the participation of disabled people. The publication of the **Inclusive Apprenticeships Disability Action Plan**<sup>66</sup>, co-produced with disability organisations has proved a valuable promotion aid for apprenticeships. The plan reinforces the Welsh Government's commitment to achieving positive outcomes for disabled people, including access to apprenticeships.

Future apprenticeship delivery will require robust monitoring and evaluation to understand how to support apprentices in the 'new normal' learning environment. Data alone, however, does not capture the full apprenticeship journey. There are challenges around disability and ethnicity disclosures as this recorded data is reliant on self-disclosures and self-identification. Anecdotal evidence is needed from providers and the apprentice to **understand why disclosures on disability, health and ethnicity are not volunteered** at point of access to ensure the support given to learners is not only captured but **reflected in numbers** of disclosures presented in the LLWR.

### Apprenticeship Providers will:

- Explore the use of **learner profiling systems** and work with the LLWR team to reveal the data's narrative to identify **which profiling areas should be recorded, monitored and evaluated** to demonstrate progress towards the EDI outcomes.
- Benchmark EDIP activities and EDI progress across apprenticeship provision to increasing participation into apprenticeships and achieving equity and equality of opportunity for all apprentices.
- Liaise with the Welsh Government and External Stakeholders to identify **how best to record, evaluate and record progression and achieved milestones** for the apprentice and AP.
- Set short and long-term goals related to disability, Black, Asian and minority ethnic and gender to demonstrate achievements and outcomes over the EDI strategy period.

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<sup>65</sup> <https://senedd.wales/laid%20documents/cr-ld11416/cr-ld11416-e.pdf>

<sup>66</sup> <https://gov.wales/disability-action-plan-apprenticeships>

## Measuring Success

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Apprenticeships exist in a very different environment to the manifesto pledge of 2016 to create 100,000 new starts. Then, apprenticeships were considered the essential ingredient of economic success and a vital tool in building a stronger, fairer and more equal Wales<sup>67</sup>. Whereas the investment in skills to secure our future economy was the main driver and rationale for apprenticeships, no one could foresee the impact Brexit and Covid-19 have had on the Welsh economy. It is challenging to future-proof this strategy, but the vision for achieving an inclusive apprenticeship programme must remain.

This strategy reflects what success may look like for apprentice providers, apprentices, external stakeholders, and the Welsh Government to achieve the vision of an equitable, diverse and inclusive apprenticeship programme. This EDI strategy aims to look beyond the numbers of starts and completions of frameworks to put forward other measures that contribute to apprentices' successful outcomes.

External stakeholders provide a gateway to attracting new cohorts who want to access apprentice programmes. They also have a role in celebrating and promoting apprentices' key milestones and supporting the approach for measuring success. Apprentices should have centre stage in demonstrating what they have achieved with timely and appropriate support to overcome challenges.

Demonstrating how approaches and actions have led to increased numbers and opportunities for the priority groups will be this EDIP's legacy.

### **Apprenticeship Providers will:**

- Identify the essential components against which to measure the impact of the EDI strategy
- Capture the unique journey of diverse learners who take up apprenticeships and involve them in presenting and promoting what success looks like to them.
- Monitor and evaluate the EDIP activities' take-up to create a cohort of skilled equality and diversity practitioners who can respond effectively to diverse learners' needs.

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<sup>67</sup> <https://gov.wales/apprenticeships-skills-policy-plan>

This strategy offers a **Framework of Success for Apprenticeships** based on achieving the following outcomes

<b>For Learners</b>	<b>For Apprenticeship Providers (APs)</b>	<b>For Welsh Government</b>
<b>Demonstrating Learner Support</b>		
<p>Number of apprentices that receive additional learning support</p> <p>Number of apprentices that disclose health/disability conditions or ethnicity</p>	<p>Increased number of APs using Access to Work</p>	<p>Increased number of APs accessing Additional Learning Support funds</p>
<b>Demonstrating Progression</b>		
<p>Number of apprentices disabled apprentices or apprentices from Black, Asian and minority ethnic backgrounds that complete their framework</p> <p>Number of disabled apprentices or apprentices from Black, Asian and minority ethnic backgrounds that progress to higher-level apprenticeships</p> <p>Number of disabled apprentices or apprentices from Black, Asian and minority ethnic backgrounds that receive or nominated for an Apprenticeship Award</p> <p>Number of disabled apprentices or apprentices from Black, Asian and minority ethnic backgrounds apprentices that sustain employment</p>	<p>Increased numbers of disabled people progressing from traineeships to apprenticeships</p> <p>Increased number of providers accessing training opportunities</p> <p>Number of APs attaining Equality and Diversity Marks or Accreditations</p> <p>Number of APs achieved set targets of increasing the number of disabled and Black, Asian and minority ethnic people into Apprenticeships</p>	<p>Providers achieve year on year increased participation of disabled people, Black, Asian and minority ethnic accessing apprenticeships</p> <p>Increased number of APs accessing Have a Go funding/training/delivering events</p> <p>Increased number of nominations Apprenticeship Awards for disabled apprentices and apprentices from BAME backgrounds</p> <p>Increased participation of disabled learners in World Skills Event</p>
<b>Demonstrating Diversity</b>		
<p>Number of disabled apprentices or apprentices from Black, Asian and minority ethnic backgrounds that become apprenticeship ambassadors</p>	<p>Increased number of females going into construction and engineering</p> <p>Increased number of males into Healthcare and Public Sector and Business Administration</p>	<p>Increased retention of apprenticeships starts from disabled, Black, Asian and minority ethnic people females into construction and engineering</p> <p>Increased case studies featuring disabled people, Black, Asian and minority ethnic individuals and gender balance</p>



## Appendix D

## WBL Equality Diversity and Inclusion Strategy Programme Summary

## First Year - 2020 to 2021

Programme Activity Summary	Expertise and Resources needed	Timescales	
		From	To
Organise 3 online events to inform development of 3 specific 3 yr engagement projects to demonstrate increased access and participation of disabled people, individuals from Black, Asian and minority ethnic backgrounds in to apprenticeships to achieve gender balance across apprenticeships with activities	SEDL External Stakeholders Apprenticeship Providers Equality Manager	Dec 2020	Dec 2021
Produce 6 case studies per year featuring disabled, Black, Asian and minority ethnic apprentices and of males and females in apprenticeship industries where they are underrepresented	NTfW Events and Marketing Team Welsh Government	Dec 2020	Dec 2021
Identify 4 female and male apprenticeship ambassadors per year from construction, engineering and Healthcare and Public Sector backgrounds to promote apprenticeships at career development days and external stakeholder events	NTfW Apprenticeships Development Team Head of WBL Quality Have a Go equipment	Dec 2020	Dec 2021
Start quarterly online EDI meetings (March, June, September, December) per year for APs to share EDI practice and gain information on EDI matters	Engagement Project budget	Mar 2021	Dec 2021
Organise 4 engagement events per year to mark national awareness days such as Black History Month, International Women's Day, International Day of Disabled People, World Mental Health Day, Gypsy Roma Traveller Month	Training Event budget	Mar 2021	Dec 2021
Organise 2 webinars per year in conjunction with third sector organisations experienced in delivering online accessible learning for disabled apprentices and those with English as a second language		Mar 2021	Dec 2021
Evaluate feedback from Black, Asian and minority ethnic online event to inform Black, Asian and minority ethnic Engagement Project to increase take up of apprenticeships		Jul 2021	Sept 2021
Undertake annual EDI reviews with all APS to measure impact of participation in the EDIP and produce annual review report		Jul 2021	Sept 2021
Implement 3 yr Disabled People Engagement Project		Jul 2021	Jul 2024
Introduce Benchmarking against the apprenticeship providers' participation in the EDIP activities		Sep 2021	Jul 2026
Organise 1 Have a Go event per year in an ALN Centre to raise awareness of apprenticeships to Yr 10 to Yr 13 pupils with additional learning needs		Sept 2021	July 2026
Undertake an annual EDI training needs analysis of apprenticeship providers to address areas of development		Sept 2021	Dec 2021
Organise Bi-annual EDI Training event for APs and apprenticeship employers with third sector organisations to improve EDI knowledge and share good practice across the sectors		Oct 2021	Nov 2021
Produce Annual Review report on the impact of the EDIP		Sep 2021	Dec 2021

**Second Year – 2021 to 2022**

<b>Programme Activity Summary</b>	<b>Expertise and Resources needed</b>	<b>Timescales</b>	
		<b>From</b>	<b>To</b>
Produce 6 case studies per year featuring disabled, Black, Asian and minority ethnic apprentices and of males and females in apprenticeship industries where they are underrepresented	SEDL External Stakeholders Apprenticeship	<b>Dec 2021</b>	<b>Dec 2022</b>
Identify 4 female and male apprenticeship ambassadors per year from construction, engineering and Healthcare and Public Sector backgrounds to promote apprenticeships at career development days and external stakeholder events	Providers Equality Manager NTfW Events and Marketing Team	<b>Dec 2021</b>	<b>Dec 2022</b>
Organise quarterly EDI monitoring and evaluation meetings to assess the impact of EDIP and identify where support or interventions are needed	Welsh Government NTfW Apprenticeships Development Team Head of WBL Quality	<b>Sept 2021</b>	<b>Jul 2022</b>
Organise 4 engagement events to mark awareness days such as Black History Month, International Women's Day, International Day of Disabled People, World Mental Health Day, Gypsy Roma Traveller Month	Have a Go equipment  Engagement Project budget	<b>Dec 2021</b>	<b>Sept 2022</b>
Organise 2 webinars per year in conjunction with third sector organisations experienced in producing online accessible materials for disabled learners and learners with English as a second language		<b>Dec 2021</b>	<b>Sept 2022</b>
Undertake annual EDI reviews with <b>all</b> APS to measure the impact of participation in the EDIP and produce annual review report		<b>Jul 2022</b>	<b>Sept 2022</b>
Implement a 3 yr Achieving Gender Balance (AGB) project with outcomes to achieve gender balance across apprenticeships		<b>Jul 2022</b>	<b>Jul 2025</b>
Produce 1 <sup>st</sup> -year Disabled People Engagement Project Report		<b>Sept 2021</b>	<b>Dec 2021</b>
Implement a 3 yr Black, Asian and minority ethnic Engagement Project with outcomes to increase take-up of apprenticeships from Black, Asian and minority ethnic individuals		<b>Oct 2022</b>	<b>Oct 2025</b>
Review annual EDI training needs analysis of apprenticeship providers to address areas of development at Bi-annual training event		<b>Jan 2022</b>	<b>Dec 2022</b>
Produce Annual report on the impact of the EDIP including benchmarking		<b>Sept 2022</b>	<b>Dec 2022</b>

**Third Year – 2022 to 2023**

Programme Activity Summary	Expertise and Resources needed	Timescales	
		From	To
Produce 6 case studies per year featuring disabled, Black, Asian and minority ethnic apprentices and of males and females in apprenticeship industries where they are underrepresented	SEDL External Stakeholders Apprenticeship	Dec 2022	Dec 2023
Identify 4 female and male apprenticeship ambassadors per year from construction, engineering and Healthcare and Public Sector backgrounds to promote apprenticeships at career development days and external stakeholder events	Providers Equality Manager NTfW Events and Marketing Team	Dec 2022	Dec 2023
Organise 2 webinars per year in conjunction with third sector organisations experienced in producing online accessible materials for disabled learners and learners with English as a second language	Welsh Government NTfW Apprenticeships Development Team	Mar 2023	Dec 2023
Undertake annual EDI reviews with all APS to measure the impact of participation in the EDIP and produce annual review report	NTfW Head of Quality Have a Go equipment	Jul 2023	Sept 2023
Organise quarterly EDI monitoring and evaluation meetings to assess the impact of EDIP and identify where support or interventions are needed	Engagement Project budget Training Event budget	Sept 2022	Jul 2023
Produce Annual report of engagement events to mark awareness days such as Black History Month, International Women's Day, International Day of Disabled People, World Mental Health Day, Gypsy Roma Traveller Month		Sept 2023	Dec 2023
Implement a 3 yr Achieving Gender Balance (AGB) project with outcomes to achieve gender balance across apprenticeships		Sept 2022	Sept 2025
Produce 2 <sup>nd</sup> -year Disabled People Engagement Project Report		Sept 2022	Dec 2022
Produce 1st yr Black, Asian and minority ethnic Engagement Project Report		Oct 2022	Dec 2022
Organise Bi-annual EDI Training event for APs and apprenticeship employers in conjunction with third sector organisations to improve EDI knowledge and share good practice across the sectors		Oct 2023	Nov 2023
Produce 3 <sup>rd</sup> -year Disabled People Engagement Project Report		Sept 2023	Dec 2023
Produce 1 <sup>st</sup> -year AGB Project Report		Sept 2023	Dec 2023
Introduce the participation target for Black, Asian and minority ethnic Engagement Project		Dec 2023	Jul 2025
Produce Annual Review report on the impact of the EDIP		Sept 2023	Dec 2023

### Fourth Year – 2024 to 2025

Programme Activity Summary	Expertise and Resources needed	Timescales	
		From	To
Produce 6 case studies per year featuring disabled, Black, Asian and minority ethnic apprentices and of males and females in apprenticeship industries where they are underrepresented	SEDL External Stakeholders Apprenticeship	Jan 2024	Dec 2024
Identify 4 female and male apprenticeship ambassadors per year from construction, engineering and Healthcare and Public Sector backgrounds to promote apprenticeships at career development days and external stakeholder events	Providers Equality Manager NTfW Events and Marketing Team	Jan 2024	Jul 2024
Undertake annual EDI reviews with all APS to measure the impact of participation in the EDIP and produce annual review report	Welsh Government NTfW Apprenticeships Development Team	Jul 2024	Sept 2024
Organise quarterly EDI monitoring and evaluation meetings to assess the impact of EDIP and identify where support or interventions are needed	NTfW Head of Quality Have a Go equipment	Sept 2024	Jul 2025
Produce Annual report of engagement events to mark awareness days such as Black History Month, International Women's Day, International Day of Disabled People, World Mental Health Day, Gypsy Roma Traveller Month	Engagement Project budget Training Event budget	Sept 2024	Dec 2024
Organise 2 webinars per year in conjunction with third sector organisations experienced in producing online accessible materials for disabled learners and learners with English as a second language		Mar 2024	Dec 2024
Produce 2 <sup>nd</sup> year BAME Engagement Project Report		Oct 2024	Dec 2024
Produce 2 <sup>nd</sup> year Achieving Gender Balance (AGB) Project Report		Sept 2024	Dec 2024
Organise Bi-annual EDI Training event for APs and apprenticeship employers in conjunction with third sector organisations to improve EDI knowledge and share good practice across the sectors		Oct 2025	Nov 2025
Produce Annual Review report on the impact of the EDIP		Sept 2025	Dec 2025

**Fifth Year – 2025 to 2026**

<b>Programme Activity Summary</b>	<b>Expertise and Resources needed</b>	<b>Timescales</b>	
		<b>From</b>	<b>To</b>
Produce 6 case studies per year featuring disabled, Black, Asian and minority ethnic apprentices and of males and females in apprenticeship industries where they are underrepresented	SEDL External Stakeholders Apprenticeship Providers Equality Manager NTfW Events and Marketing Team Welsh Government NTfW Apprenticeships Development Team Head of WBL Quality Have a Go equipment  Engagement Project budget	<b>Jan 2025</b>	<b>Dec 2025</b>
Identify 4 female and male apprenticeship ambassadors per year from construction, engineering and Healthcare and Public Sector backgrounds to promote apprenticeships at career development days and external stakeholder events		<b>Jan 2025</b>	<b>Jul 2025</b>
Undertake annual EDI reviews with <b>all</b> APS to measure the impact of participation in the EDIP and produce annual review report		<b>Jul 2025</b>	<b>Sept 2025</b>
Organise quarterly EDI monitoring and evaluation meetings to assess the impact of EDIP and identify where support or interventions are needed		<b>Sept 2025</b>	<b>Jul 2026</b>
Organise 4 engagement events to mark awareness days such as Black History Month, International Women's Day, International Day of Disabled People, World Mental Health Day, Gypsy Roma Traveller Month		<b>Sept 2025</b>	<b>Jul 2026</b>
Organise 2 webinars per year in conjunction with third sector organisations experienced in producing online accessible materials for disabled learners and learners with English as a second language		<b>Mar 2025</b>	<b>Dec 2025</b>
Produce 3 <sup>rd</sup> year Black, Asian and minority ethnic Engagement Project Report		<b>Oct 2025</b>	<b>Dec 2025</b>
Produce 3 <sup>rd</sup> year Achieving Gender Balance (AGB) Project Report		<b>Sept 2025</b>	<b>Dec 2025</b>
Organise 1 Roundtable discussion event with all apprenticeship stakeholders to evaluate participation discuss Framework of Success		<b>Oct 2025</b>	<b>Dec 2025</b>
Produce a Framework of Success		<b>Jan 2026</b>	<b>Mar 2026</b>
Produce Annual Final Evaluation Report on the impact of the five year EDIP		<b>Mar 2026</b>	<b>Jul 2026</b>

## Appendix B

### Strategic Context

<b>Improving Access to Apprenticeships</b>	
<b>Strategy</b>	<b>Key Aims</b>
<b>Employability Plan 2018</b>	Increase the number of employers who place emphasis on creating workplaces which are inclusive and supportive environments for disabled people and those with long-term health conditions
<b>Enabling Gypsy Roma Travellers Plan 2018</b>	Promote awareness of apprenticeship opportunities with Gypsies Roma and Travellers to enable increased employment and learning opportunities.
<b>Equality and Human Rights Commission Is Wales Fair Report 2018</b>	Apprenticeship providers, employers should - <ul style="list-style-type: none"> <li>• take action to address barriers to participation</li> <li>• set and meet targets for improved participation and to use positive action provisions.</li> <li>• be held to account by WG through procurement and funding mechanisms.</li> </ul>
<b>Inclusive Apprenticeships: Disability Action Plan 2018</b>	Apprenticeship providers should - <ul style="list-style-type: none"> <li>• break down pre-conceptions that employers may have around taking on a disabled apprentice.</li> <li>• adopt the Social Model of Disability</li> </ul>
<b>Asylum Seekers and Refugees Plan 2019</b>	Promote awareness of apprenticeship opportunities with refugees to enable increased employment and learning opportunities
<b>Framework for Independent Living 2019</b>	Raise awareness of apprenticeship provision amongst individuals, parents and carers using real life case studies to ensure that disabled people feel that the Apprenticeship programme is a viable route for them.

## Appendix C

### Legislative Context

Improving Equity and Equality of Opportunity	
Legislation	Details
<b>Equality Act 2010<sup>68</sup></b>	This is a legal framework to protect the rights of individuals and advance equality of opportunity for all. It provides discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.
<b>Wellbeing of Future Generations (Wales) Act - 2015<sup>69</sup></b>	The Wellbeing Goal of 'A More Equal Wales' is a society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
<b>Gender Pay Gap (GPG) Duty <sup>70</sup> Effective from 2017</b>	Employers with 250 or more employees must publish and report specific figures about their gender pay gaps.
<b>Additional Learning Needs and Education Tribunal (Wales) Bill<sup>71</sup> Effective from September 2020</b>	Replaces the current Special Educational Needs (SEN) framework with a reformed system based on Additional Learning Needs (ALN)
<b>Socio-Economic Duty<sup>72</sup> Effective from 2021</b>	To deliver better outcomes for those who experience socio-economic disadvantage.
<b>Curriculum for Wales 2022<sup>73</sup> Implementation from September 2022</b>	All schools are required to design their curriculum, including the supporting assessment arrangements, ready for its adoption by 2022. Teachers requested to raise awareness of apprenticeships.

<sup>68</sup> <https://www.equalityhumanrights.com/en/equality-act/equality-act-2010>

<sup>69</sup> <https://www.futuregenerations.wales/about-us/future-generations-act/>

<sup>70</sup> <https://www.gov.uk/guidance/gender-pay-gap-reporting-overview>

<sup>71</sup> <https://gov.wales/additional-learning-needs-and-education-tribunal-wales-act>

<sup>72</sup> <https://gov.wales/socio-economic-duty-overview>

<sup>73</sup> <https://gov.wales/curriculum-for-wales>

## Appendix D

### List of Contributors

#### Work-based Learning Providers

##### South East Wales

ACT Training and ALS Training (Joint response)  
Babcock International  
Cardiff and Vale College  
CITB  
ITEC Training Ltd  
Isa Training and Educ8 Training (Joint response)  
People Plus  
Torfaen Training  
T2

##### South West-Mid Wales

B-WBL  
Cad Centre  
Cambrian Training  
Gower College Swansea  
PRP Training  
Skills Academy Wales

##### North Wales

Coleg Cambria  
Grŵp Llandrillo Menai

##### External Stakeholders

Chwarae Teg  
Disabled People's Employment Working Group  
Equality and Human Rights Commission  
Learning Disability Wales/Engage to Change  
Race Alliance Wales  
Race Council Cymru  
Welsh Government Apprenticeship Unit  
Welsh Government Education and Lifelong Learning Statistics