nus scotland
national union of students

mail@nus-scotland.org.uk
www.nus-scotland.org.uk

Education and Gaelic Committee Written Submission - NUS Scotland

Introduction

NUS Scotland represents students in Scotland's colleges and universities and apprentices. Our starting point, set out in NUS Scotland's Roadmap to a New Education System, is that education is a public good and that there should be complete parity between further and higher education. We believe that parity must extend to apprentices. We believe apprentices should get the best of both worlds, the education of a student and the rights of a worker, rather than the worst of both. Apprentices are learners as well as workers, and the reform of the apprenticeship system should be judged on whether it gives them the same rights, support and voice that other learners in Scotland's tertiary system have.

How apprenticeships are delivered to, and accessed by, young people.

Scotland has three apprenticeship routes, Foundation Apprenticeships, Modern Apprenticeships, and Graduate Apprenticeships. Each route is funded and delivered differently.

Foundation Apprentices are taken by school pupils in S3 to S6 usually through school partnerships with local authorities, colleges and employers. Modern Apprenticeships are jobs the apprentice is employed and trains with a college or private training provider using public funding, currently administered through Skills Development Scotland. Graduate Apprenticeships combine employment with a degree and are funded through the Scottish Funding Council.

This system creates difficulties for individuals applying for apprenticeships who are navigating three different systems, three different sets of rules and sources of information. There are also challenges in sourcing apprentices, while sites such as Apprenticeships.scot list vacancies, prospective apprentices are then required to apply through the employer's own process without a process similar to UCAS. The National Union of Students Scotland has called for one central application route which covers all publicly funded apprenticeships with advice on how to apply as well as highlighting the rights apprentices have as workers.

Apprenticeship delivery is also uniquely vulnerable to economic changes as an apprenticeship role only exists if an employer creates the role. Skills

Development Scotland's 2025/26 own statistics show that Modern Apprenticeships seen 2.6% fewer apprenticeship starts than the year before. This reduction was particularly concentrated amongst younger people, 16 – 19 year olds seen starts fall by 4.6% and 20 – 24-year-olds seen a fall of 3.7% compared with just 0.3% for those aged 25 and over. Skills Development Scotland itself admits that it expects factors such as rising business costs and weak confidence to reduce the recruitment of younger applicants in 26/27.

Furthermore only 55.9% of apprenticeship starts where for those ages between 16 – 24 and 45.5% of Modern Apprenticeship starts had actually been in employment with their employer for more than a year, upskilling is obviously important but this demonstrates that the system is not working as intended for young people looking for a route into employment after school or college.

Additionally, apprentice applicants can find that there are geographical limitations also, across Scotland 8.3% of employed 16 – 24-year-olds are Modern Apprentices, however the spread of this varies considerably across Scotland. In Argyll and Bute this is about 26.6% compared with just 3.3% in Edinburgh and 4.9% in Dundee. This is due to Modern Apprentices being allocated by employer demand rather than locally allocated, this means that some applications, particularly in larger cities may have fewer opportunities.

There are also barriers to accessing apprenticeships for disabled apprentices with only 17% of Modern Apprentices identified as disabled compared with 28.1% of the working age population, and disabled applications also faced an achievement gap of 74.1% compared with 81.7% for non disabled applicants. Care experienced apprentices made up 2.9% of apprentices but their achievement rate was 71.3% compared with 80.6%. Apprentices from SIMD 20 areas the achievement rate was 76.8%. Apprentices who are women made up 41.2% of starts but only represent 14.3% of STEM apprentices and at SCQF level 5 males made up 74% compared to 26% female.

Financially accessing apprentices can be its own challenge. The minimum wage for apprentices is £8 an hour compared with £12.71 for workers aged 21 and over, NUS Scotland has long argued that apprentices being on this lower rate means that they are effectively paying for their own training, where as home students, rightly, pay no tuition fees. The current system also precludes apprentices from accessing support packages such as bursaries, hardship funds and support services.

Furthermore, apprentices are particularly impacted by transport costs, while the under 22 free bus travel is particularly welcome we can see that a

considerable number of apprentices are over 22 and live within rural areas adding an additional financial barrier to completion when wages are already lower.

In addition, research the National Society of Apprentices, (now NUS Scotland) spoke to 150 trade apprentices and found that two thirds where on the apprentice minimum wage, and had spent an average of £600 on tools and equipment in the first year of their apprenticeship. The benefits systems compound the financial challenges of apprentices as the UK social security system does not treat an apprenticeship as approved education or training for receipt of child benefit which means a young person taking on an apprenticeship could cost their family £100 a month.

Beyond the financial and access challenges to apprenticeships, apprentices in Scotland no not have the same protected off the job training requirement that apprentices in England receive. This leads to apprentices quality of learning suffering, facing isolation from peers and this isolation can lead to another barrier to completion.

NUS Scotland is of the position that all apprentices should have access to day or block release, this allows apprentices to meet with peers, gives them access to college support services including childcare, mental health support services and student support.

Whether current apprenticeship offers meets skills demand, and how this might improve

NUS Scotland believes the current apprenticeship system fails to meet Scotland's economic and workforce needs because it treats apprentices as cheap labour rather than properly supported learners. Persistently low pay, including an apprentice wage below the standard minimum wage, pushes many young people into poverty and undermines retention and completion. Structural inequalities also leave apprentices in female-dominated sectors, such as social care and retail, in low-paid roles without the robust off-the-job training or day release available in traditional male-dominated trades.

To better meet skills demand, apprenticeships must guarantee high-quality education and financial security. All apprentices should receive at least the Real Living Wage. We wholeheartedly welcome the Scottish Government's steps to secure this for public sector and publicly funded apprentices, but further measures are needed to encourage private employers to follow suit. The Scottish Government should also urge the UK Government to raise the national apprentice minimum wage to the Real Living Wage. Mandatory costs, including tools and equipment, must be addressed through grants or transparent upfront disclosure. Every apprenticeship framework must also

provide day or block release, ensuring vocational routes meet the same standards as higher education.

The Scottish Government's aims for the reform of the apprenticeship system

As the national representative body for tertiary education students in Scotland, NUS Scotland believes apprentices must be recognised as both workers and students. We welcome the consolidation of apprenticeship delivery under a redesigned Scottish Funding Council as a step towards a more coherent system that is more likely to deliver genuine parity of esteem between apprenticeships, further education, and higher education. It is, however, just a starting point. In the UK total employer investment in skills declined 19% per employee, in real terms, between 2011 and 2022, meaning greater investment in skills is essential.

While the new legislation introduces a dedicated Apprenticeship Committee within the SFC and consultation requirements, we emphasise that these mechanisms must translate into real, tangible outcomes for apprentices themselves rather than stopping at administrative streamlining. Reform must be bolder than rationalisation and must prioritise apprentice interests by tackling financial hardship, eradicating hidden costs such as mandatory expenses for tools and equipment, ensuring robust and equal access to off-the-job training across all sectors, and embedding genuine, democratic apprentice influence into the heart of governance.

The progression of plans to give the Scottish Funding Council new responsibilities for apprenticeships

We support bringing apprenticeship funding into the same body that funds colleges and universities. A single funder is a real opportunity to deliver parity between apprentices and students and to make pathways between school, college, university and work easier to navigate. We welcome that the Act requires the SFC to consider including apprentices, or people representative of apprentices, on the Apprenticeship Committee, and to consult apprentice representatives when appointing members. We also welcome the guidance's expectation of at least three apprentices or learners on the committee, although we believe more apprentice voice would be more impactful, and its suggestion that the SFC put in place infrastructure and resources to support their participation.

However, NUS Scotland believes that apprentices are an afterthought in the transition. Skills Development Scotland’s public questions and answers on the transfer speak mainly to learning providers and employers. Apprentices

get a single short answer promising no interruption. The answer on who will shape apprenticeships after April 2027 says employer and industry input will remain central and says nothing about apprentices. None of the six transition workstreams is about apprentices' experience. We ask that apprentices, through NUS Scotland are involved in the transition programme now, and that there is communication written for apprentices, not just for providers and employers.

We have concerns regarding the balance of voices on the Apprenticeship Committee. The guidance expects at least half of the members to be employers or employer representatives, and requires the chair to be an employer. With a committee of 10 to 20, three apprentices could be a small minority. Employer voice matters, but apprentices are the people the system exists to serve. There is a real risk of tokenism unless apprentice members are properly supported: paid for their time or given protected release from work, with expenses, induction and ongoing support.

The guidance asks members not to narrowly represent their own organisation. We understand the intent, but apprentice members will only be effective if they are connected to, and accountable to, other apprentices. We ask that apprentice members be drawn from or nominated through representative structures such as NUS Scotland, and that NUS Scotland is formally consulted on appointments, as the Act requires the SFC to consult representatives of apprentices.

We would encourage the SFC to learn from the social partnership models NUS Scotland has seen through the European Apprentice Network, where government, employers, educators and apprentices govern the system together. The new committee is weighted towards employers; a genuine social partnership would put democratic apprentice voice at its heart.
We would welcome a clear timetable for the reform phase, we understand why "lift and shift" protects continuity. But there is not yet a published timetable for what comes after the transfer. Without one, the promised reduction in complexity could drift. We ask that the Scottish Government and SFC publish a reform roadmap with milestones before April 2027 and report progress to Parliament.

We are concerned around possible disruption to ongoing apprenticeships. There were 39,237 Modern Apprentices in training at the end of March 2026. They need certainty that their training, funding and provider arrangements will continue without interruption, and clear communication about what, if anything, changes for them on 1 April 2027.

We welcome the commitment that core systems, including the FIPS system that manages apprentice records and funding, will stay the same, and that

experienced Skills Development Scotland staff will move across. But other machinery apprentices rely on is not addressed in the public transition material. This includes the SESAP self-evaluation and quality assurance process for learning providers, and the equality funding providers draw on to support disabled and other under-represented apprentices. The SFC should confirm publicly that these continue. Any gap in equality funding would fall hardest on the apprentices who already have the lowest achievement rates.

Furthermore, it must be clear where an apprentice goes with a complaint about their training or treatment once Skills Development Scotland no longer manages the programme. Today the complaints link on the apprenticeships website leads to Skills Development Scotland's general corporate complaints policy, not an apprentice specific process. Too many apprentices tell us they do not know where to go when things go wrong, so the SFC should put a robust complaints process for apprentices in place from day one. The transfer should also be used to look at apprentices' access to the learner support, mental health support and student representation that SFC-funded institutions provide to students.

We welcome the expectation that SFC-funded institutions meet Fair Work First criteria from April 2027. We would like to see Fair Work conditions, including progress towards the real Living Wage for apprentices, built into the new MA contract and the SFC's wider funding of apprenticeships. The open procurement SDS is running now for 2027/28 Modern Apprenticeship delivery is the immediate chance to start. Public procurement should play its part more widely too: companies bidding for public contracts should commit to offering quality apprenticeships paid at least the real Living Wage.

Skills Development Scotland currently publishes detailed equality and intersectional statistics on apprenticeships. The SFC must maintain, and ideally improve, this reporting from day one and use it to set targets that the Apprenticeship Committee scrutinises.