



# CYMRU BOARD MANIFESTO

Wales

December 2021



Levelling Up and Building Back Better in Wales is impossible without investing in professional management and leadership across our nation.

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# EXECUTIVE SUMMARY

- **World class leadership will be essential to deliver the Welsh Government's growth plans** - on infrastructure and transition to net zero, levelling up and innovation. But Wales starts from a position of considerable disadvantage: before Wales can start to 'Build Back Better' it needs to catch up, relative to other parts of the UK.
- **Every organisation (no matter its size or sector type) needs professional managers and leaders to enable performance and growth.** Two areas in particular are holding Wales back: the over representation of micro businesses and the limited availability and accessibility of management training.
- **The vast majority of Welsh businesses are very small** (95% of enterprises are micro businesses) and they struggle to invest in training. Only 8% of SMEs in Wales offer training to develop management skills and capabilities, a figure which has remained unchanged since 2017. <sup>1</sup>
- **Access to management training and upskilling is restricted**, Wales has the lowest percentage of overall training - and of management and leadership training - across all four UK nations. There are only 16 undergraduate management training providers in Wales offering 360 courses versus 292 providers in England offering over 28,000 courses. <sup>2</sup>
- **Current leadership initiatives**, such as ION Leadership and the *20Twenty* Business Growth and Leadership Programme, are underpinned by European Social Funding and **face a funding cliff in 2023**. We need to address the availability and accessibility of management training immediately if we are to avoid a long period of low productivity and slow growth.
- **Chartered Management Institute (CMI) Cymru has identified three areas of focus** with key recommendations ranging from the easy and practical to the bold and disruptive, and it starts at the very top.



<sup>1</sup> Calculated from UK Government data using the proportion of SMEs offering training for managers in Management and Leadership in the UK and the number of SMEs in the UK.  
<sup>2</sup> Data from <https://www.ucas.com/>

## STRATEGIC AWARENESS – LEADERSHIP FROM THE TOP IS FUNDAMENTAL TO GROWTH

- 1 The Welsh Government to invest in leadership initiatives in line with the principles outlined in the 2021 CMI Comprehensive Spending Review.** Current leadership initiatives are underpinned by European Social Funding that expires in 2023. The UK Prosperity Fund is an opportunity to help lessen the impact of EU funding ending.
- 2 Every elected Member of Senedd and senior Senedd Committee member to complete an appropriate level of leadership qualification.** Leaders need to ‘walk the talk’ and role model professional leadership. We need to see organisations across Wales following industry-recognised professional standards for management and leadership, and committing to their ongoing professional development. **CMI professional standards** and **Chartered Manager** status can support this, and we would be pleased to collaborate with you to develop a programme or qualification that meets the specific needs of government leadership.
- 3 Clarify ownership of the leadership agenda within the Welsh Government structure.** Consider establishing a new position, such as a Director for Management and Leadership, that is empowered to work across Government Departments to ensure management and leadership skills are considered when creating new initiatives or policy.





## BUSINESS – SCALING UP IN WALES

- 4 Business Wales (in partnership with CMI) to initiate a study into the specific leadership factors that limit micro and small business from scaling up**, with a key focus on strategic growth, equality and inclusion, and including the third sector. Business Wales to also include leadership and management knowledge and skills in all 'business growth' programmes.
- 5 Create a nationwide leadership portal** that can provide clear navigation to existing leadership development pathways and professional bodies, rather than create 'new' initiatives. There is power in scaling up, collaboration and connecting support programmes, such as Business Wales mentoring with professional bodies mentoring programmes through CMI and Global Welsh. In bringing together existing services, a digital leadership 'aggregator' can increase awareness, collaboration, take-up and impact.
- 6 Conduct a nationwide marketing and communications campaign for Welsh development opportunities.** Currently, there is very low awareness of key initiatives, such as National Learner Week and Help to Grow. These opportunities need to be widely communicated to reach the SME ecosystem across Wales.
- 7 The Welsh Development Bank and any Government lender to incorporate leadership assessments into lending criteria.** Requiring evidence of a commitment to management development, such as a professional management qualification, should be used as a borrowing requirement to ensure organisations can maximise the impact of the funding they receive.

## EDUCATION AND TRAINING

- 8 Review the application of the Apprenticeship Levy in Wales, and open it up to leadership and management qualifications at undergraduate and postgraduate levels. The review should recognise management and leadership as an essential strategic upskilling priority (not limited to STEM or simply a select group of priority sectors).** All sectors need great leaders and there is currently inequality of access to management degree apprenticeships at both level 6 and 7 in Wales, compared to England. The Welsh Government needs to address this imbalance at the next review of the Welsh Apprenticeship Framework.
- 9 'Unlock' the training provider register to support new, small and specialist entrants.** A competitive range of providers will increase access to a greater range of quality training to the benefit of both businesses and students. We believe there are only 10 commissioned apprenticeship providers offering levels 2 to 5 in Wales compared to more than 1,100 in England, including employer-providers on the Apprenticeship register.<sup>3</sup> Higher level training is provided by HEIs, of which there are only 16 undergraduate and 5 postgraduate training providers in Wales compared to 292 and 102 in England, respectively.
- 10 Include entrepreneurial thinking as part of the standards for leadership in Wales.** This would support SMEs to innovate and grow. Work has already taken place across the education sector to include enterprise and entrepreneurship in level 5 and 7 degree programmes, but more work is needed at the entry level. Business Wales should consider including a leadership module in their 'business start-up' programme.

<sup>3</sup> (HMG) Find an apprenticeship, <http://findapprenticeship.service.gov.uk/apprenticeshipsearch>

## THE CHALLENGE

It has been well documented that a lack of management quality is a key driver of poor productivity, and that making small improvements in management practices can lead to a **significant increase in productivity**. High quality leadership will be essential to deliver the Welsh Government's growth plans and to ensure that everyone, no matter what background, is able to achieve their potential in work.

Data from **ONS** shows that better managed firms fared better during the pandemic. Also, CMI has tracked and studied the direct positive financial impact of professional leadership through our Chartered Manager award, which it has been found can **boost organisations' revenue** by up to £62k every year and £310k over five years.



**During Covid everyone had to step up to the plate, the context of the crisis has enabled a new level of leadership, which we should retain forever.**

Richard Selby / Chair of Institute of Directors / Wales



However, before Wales can start to 'Build Back Better' it needs to catch up relative to other parts of the UK. Latest ONS **data** shows Wales had one of the worst productivity rates in the UK. The amount produced in Wales for every hour worked was 4.4% lower than the average of the 12 UK nations and regions. If Wales is to avoid a long period of stagnation we need to boost management and leadership skills and capabilities - and do it fast.



**Great leaders with the right skills, experience and mindset, can unlock the potential of Wales. Leaders are the key enabler for Welsh businesses to grow not just domestically but globally.**

Walter May / GlobalWelsh



## WHY IS MANAGEMENT & LEADERSHIP SO CRITICAL FOR WALES?

Every organisation, no matter what size or sector, needs professional managers and leaders to enable performance and growth. But in Wales there is a 'double-lock' challenge in developing these skills and capabilities: the over representation of micro businesses, and the limited availability and accessibility of management training. Wales has also benefited from a larger proportion of EU funding, relative to the rest of the UK, including for management training. However, this funding is due to expire in 2023 with uncertainty over how this funding gap will be addressed.

### THE OVER REPRESENTATION OF MICRO BUSINESSES COMPARED TO OTHER PARTS OF THE UK

In Wales, micro businesses (0-9 employees) account for 95% of total enterprises.<sup>4</sup> This is significant because there is a strong correlation between the size of a business and its propensity to invest in training and developing its workforce. **BEIS - 2019 Longitudinal Small Business Survey** found that 28% of Welsh SME employers had provided training for managers, but the vast majority of this training was for technical, practical or job-specific skills. Only 8% of SMEs in Wales offered training to develop management skills and capabilities, a figure that remains unchanged since 2017.<sup>5</sup> Wales has the lowest percentage of overall training - and management and leadership training - across all four UK nations (see Table 1).

2019	UK	England	Scotland	Wales	NI
SMEs providing any training	33%	33%	35%	28%	36%
SMEs providing M&L training	13%	13%	12%	8%	13%

Table 1. 2019 Small Business Survey showing the amount of training offered to managers across the UK nations.

<sup>4</sup> Wales Longitudinal small business survey: 2019, <https://gov.wales/longitudinal-small-business-survey-2019-html>

<sup>5</sup> Calculated from UK Government data using the proportion of SMEs offering training for managers in management and leadership in the UK and the number of SMEs in the UK.

## A SMALL WELSH BAKERY ATTEMPTING TO SCALE UP

Crwst have been looking for an Operations Manager to run their bakery and production site for over half a year. They are not looking for a technical baker, because they believe “those skills can be developed on the job”. Crwst are looking for a leader who can commercially run a logistics enterprise and has people management skills to coach others and inspire the team. They have identified that filling this position would unlock the creation of eight local jobs and a turnover opportunity of over £1m. However, they have not been able to find any candidates with the professional management training they need.



**I cannot train someone internally, as I don't know how to train a professional manager and there are no apprenticeships available for senior management in hospitality. Everyone seems to assume that because it is food related we are looking for a low skill level, but we need a highly skilled manager and we can't find one!**

Osian Jones, Crwst Director



Support from the UK Government for management training, such as Help to Grow: Management scheme<sup>6</sup>, is not well understood and is only available to businesses with more than five employees. In the Autumn Spending Review, Westminster committed to providing the Welsh Government with an additional £2.5bn per year on average through the Barnett formula over the next three years, and an extra £425m for 2021/22, on top of its annual baseline funding of £15.9bn. We urge the Welsh Government to use this additional allocation to boost management and leadership skills, in order to ensure growth, higher productivity and higher skills across Wales.

<sup>6</sup> The scheme is limited for businesses with more than five employees.



# WHY IS MANAGEMENT & LEADERSHIP SO CRITICAL FOR WALES?

## LIMITED AVAILABILITY AND ACCESSIBILITY OF MANAGEMENT TRAINING

In Wales, there are some leadership and management education pathways available from entry level 2 to 5 in the FE sector, and level 5 and 7 in the HE sector. However, availability is much lower than in the rest of the UK (see Table 2).

2020/21	Apprenticeships providers level 2-5	Undergraduate courses	No of providers	% of UK	Postgrad courses	No of providers	% of UK
Wales	10	360	16	1.03	78	5	1.44
Scotland	*	3,981	22	11.40	480	6	8.84
England	1,104	28,026	292	80.28	3,912	102	72.08

Table 2. Availability of management training providers for undergraduate and postgraduate courses across the UK in 2021/22 <sup>7</sup>

In terms of apprenticeships, unlike in England, in Wales the use of the Apprenticeship Levy is not available outside of the Welsh Government's priority sectors, and is currently unavailable for leadership and management in any sector. It should also be noted that in Wales education providers that can deliver on Welsh Apprenticeship Framework are limited in number, we estimate that there are only 10.

Lack of access to management training must be addressed if Wales is to compete with its neighbours and the rest of Europe for experienced and qualified leaders to grow the Welsh economy. Better alignment in terms of access to apprenticeships across the nations will also enable 'frictionless' learning for students and make it easier for organisations with employees in England and Wales to grow opportunities in professional leadership.

## CASE STUDY



For the last six years, Pizza Hut Restaurants has been offering a range of level 2 to 7 apprenticeships in partnership with training providers and universities. In 2020, they brought the apprenticeship provision in-house in England offering level 2 to 4 qualifications, which has allowed them to integrate up-to-date business content.

Currently, they only offer placements in England and (with regret) not in Wales. This is mainly because there are differences and complexities of trying to manage different apprenticeship qualifications and funding models. Employees often move across the border and having different systems makes it impossible to deliver a consistent learning experience.

For all senior managers the business encourages the completion of higher level qualifications. However for those leaders based in Wales, providing access is expensive, up to £22k per person on top of paying the Apprenticeship Levy. Making it cost prohibitive.

Higher level qualifications are critical to create an aspirational career path and retain senior talent in the hospitality industry. Once in charge of a restaurant, a manager can be responsible for a multi-million pound business and large teams of people. However, due to the nature of career paths from the shop floor up there are lots of 'accidental' managers who would benefit hugely from professional leadership development. We would urge that senior qualifications are available to all sectors and it is made easier for businesses to offer apprenticeships across the nations.



## FACING A FUNDING CLIFF EDGE

Many organisations in Wales have relied on EU funds for training and skills programmes, as well as large-scale infrastructure projects. With higher levels of economic deprivation in population terms, Wales received a large share of EU regional development funding.

Compared with England, allocations of **EU structural funds** per person were a little over a third higher in Scotland, more than twice as high in Northern Ireland, and six times as high in Wales. However, current leadership initiatives, such as *20Twenty* and ION leadership, are facing a funding cliff in 2023, because they are underpinned by European Social Funding and there is no plan yet for replacing this funding.

During the **Autumn Budget**, the UK Government announced that Welsh communities, educational institutions and businesses will share over £2.6bn of the Prosperity Fund over the next three years with the other UK nations. We need to see management and leadership development as a priority spending area for the UK Prosperity Fund.

### CASE STUDY



## 2023 FUNDING CRISIS – TWO CRITICAL MANAGEMENT AND LEADERSHIP PROGRAMMES AT RISK

### 20TWENTY BUSINESS GROWTH & LEADERSHIP PROGRAMME

The *20Twenty* Business Growth and Leadership Programme is the only Management and Leadership course in Wales to offer all CMI qualifications from level 3 to 7 including a Postgraduate Certificate, and enable individuals to progress through the levels. Over 1,000 people have achieved a professional qualification.

*20Twenty* offers cross-sector senior leadership programmes that have already benefited 10% of the top 300 businesses in Wales. This includes large businesses like Sony, Admiral, and Atradius, but also SMEs that need access to best practice skills development at an affordable rate.



I am concerned that the link between productivity and leadership is not being fully appreciated by policymakers. The *20Twenty* has been subsidised by the European Social Fund through the Welsh Government since 2010, but the EU funding will stop in 2023. The value of the project has been over £12m, and the EU subsidy accounts for over half of this. The loss of EU funding (without any replacement being put in place) would be disastrous in Wales, not only for management and leadership provision, but also in the potential decline in productivity across many sectors of the economy.

Christopher Byrne, Deputy Director, Creative Leadership and Enterprise Centre (CLEC)



# WHY IS MANAGEMENT & LEADERSHIP SO CRITICAL FOR WALES?

## CASE STUDY



## 2023 FUNDING CRISIS – TWO CRITICAL MANAGEMENT AND LEADERSHIP PROGRAMMES AT RISK

### ION LEADERSHIP PROGRAMME

ION Leadership is a programme designed to develop and enhance the leadership skills of business owners and managers in Wales. For the past 11 years, ION leadership has supported over 1,600 leaders in over 1000 businesses across Wales to become better leaders. ION has empowered businesses from geographically remote and/or deprived regions in Wales, enabling them to access the skills necessary to scale and create further job opportunities.

ION leadership programmes have delivered a marked increase in turnover - 26% on average - created sustainable enterprises capable of continuous growth, and developed better equipped leaders with enhanced knowledge and skills. 97% of delegates have reported that the programme and network has had a significant impact on them and the way they work. As with *20Twenty* above, funding at ION is at risk beyond 2023.



At ION we have a proven return on investment in leadership training and we had ambitious plans to expand our services. However, we will be forced to close all of our existing programmes without some support funding to replace the European Social Fund [...] I am very concerned that by not providing adequate professional development opportunities for our micro and small business leaders across Wales we really are capping future growth and this will impact particularly rural economies. It feels such a missed opportunity when for a modest investment we could springboard these same businesses to grow and create jobs.

Suzanne Parry Jones, the ION Project Lead



## MANAGEMENT SKILLS ARE CENTRAL TO WORKPLACE SUCCESS

Management and leadership skills are not a 'nice to have'. They are vital to the success of individuals and businesses, across all sectors and job roles by widening the pool of jobs individuals can access and enhancing individuals' ability to progress within those roles.

**Recent CMI research** highlights the impact of management and leadership on student outcomes: analysis of graduate earnings data finds 64% of graduates with CMI accredited degrees are employed in highly skilled roles 15 months after graduation compared to 57% of graduates with non accredited business degrees<sup>8</sup>. This research also finds that almost all employers (97%) think that CMI's employability framework, which is underpinned by the **Professional Standards for Management and Leadership**, would equip graduates with the skills to get on in the workplace.

The lack of management development opportunities is one of the key reasons talented individuals choose to pursue careers outside of Wales. We need to address these management gaps if we are to ensure that young people can feel "confident about planning their future" in Wales, something Welsh Minister for the Economy, Vaughan Gething, **recently championed**. Investing in core management skills will deliver more employment and progression opportunities and will ensure Wales' labour force is adaptive and resilient in supporting the country's economic recovery.



# WHY IS MANAGEMENT & LEADERSHIP TRAINING SO IMPORTANT FOR WALES?

Our political representatives are the ultimate public showcase for Wales, both globally and domestically. We need all of our nations' key representatives to recognise the power of positive leadership in every facet of our society. We believe there is a great opportunity for Welsh politicians to demonstrate professional leadership that sets a gold standard for the rest of the UK to follow.

As well as taking accountability at the level of an individual leader, we have an opportunity to clarify ownership of the leadership agenda within the organisational design of the Senedd. The challenging agendas represented by the current ministries and strategic growth aspirations for Wales will only be achieved through access to the right quantity and quality of capable leaders. Building capability is a long term structural challenge for Wales and this needs a higher level of priority in decision making and investment decisions.

We would like to see organisations across Wales adopt the CMI **Code of Conduct and Professional Practice**, as a standard for all leaders and managers and for all political representatives to strive for leadership excellence and commit to their continuing professional development, such as through membership of a professional body or completion of **Chartered Manager**. CMI would be pleased to collaborate with the Welsh Government, civil servants and political representatives to develop a programme or qualification that meets the specific needs of government leadership.

## BEST PRACTISE CASE STUDY



### INSTITUTION OF CIVIL ENGINEERS' APPROACH TO LEADERSHIP DEVELOPMENT IN WALES

Institution of Civil Engineers (ICE) recognised many years ago that it had to develop the range and skills required to be a civil engineer. This can include the delivery of major and long term strategic infrastructure projects. They would need to establish professional development programmes that offer members the opportunity to follow pathways leading to senior management.

ICE believes their approach to training is so effective because their programmes produce expert engineers, while also developing their leadership capabilities. This produces leaders who can make the step from being individual technical contributors to managing large teams of people, and delivering effectively on strategic priorities.

Management and leadership is inbuilt in the overall attribute development for all civil engineers. In addition, apprenticeships and development programmes offered by the ICE integrate 'hard' and 'soft' skills with the Chartered Civil Engineer pathway culminating in professional Chartered Manager status.



**You might be a teacher, a lawyer, or a civil engineer, it really does not matter what your career background is, in order to 'level up' and create a prosperous Wales, we need strong leadership in every profession – I am proud to be a Fellow of CMI and seeking to be a qualified Chartered Manager**

**Keith Jones, Director, ICE Wales Cymru**



# WHY IS LEADERSHIP IN BUSINESS CENTRAL TO SCALING UP SMEs?

To unleash innovation and growth in Wales, SMEs need a productive business environment to scale up. The Welsh Government does offer programmes to help SMEs scale up, but these do not include any formal leadership and management training. Yet strong management capability is essential to enabling firms to scale.<sup>9</sup>

In 2021, CMI Cymru hosted a series of four panel interviews entitled 'There is Gold in the Welsh Valleys', exploring the opportunities for Wales after Covid and Brexit. Across all panels, the importance of professional leadership emerged as the most important enabler of future prosperity in Wales.

The panels highlighted entrepreneurship and leadership go hand in hand, with Professor Brian Morgan (Director at CLEC, Cardiff School of Management, Cardiff Metropolitan University) referencing that although 40-50% of the traits of an entrepreneur - risk taking for example, tend to be inherent in the individual, 40-50% of traits can be developed through experience and training. Some progress has been made by the Welsh Government to integrate entrepreneurship skills into education, but more can be done to develop the leadership skills required to realise and execute an idea.

At CMI we talk a lot about the 'accidental' leader and the impact an untrained manager can have on others compared to the increased productivity professionally trained managers can deliver. As Professor Brian Morgan referenced, to be successful, entrepreneurs need support, mentoring, and access to development and capability they may not have themselves, in order to build their businesses.



**The Welsh Government needs to back an entrepreneurial ecosystem for the whole of Wales by focusing on three key areas: accessible markets, funding and finance and probably most importantly human capital and talented leadership. We need to create an enterprise ecosystem that enables entrepreneurial leaders to consider expansion opportunities beyond their locality, county, country, Union, and even to go international. Achieving this will deliver inclusive prosperity for everyone in Wales.**

Neil Reynolds CMgr CCMI / Business Stakeholder  
Lead for CMI Wales Board



Good management is not only important to help SMEs to grow and scale up, but also to maximise their employees' talent. CMI **research** with the Learning and Work Institute shows that managers have a critical role to play in ensuring that employees thrive in their roles, especially when changing jobs. 91% of low-skilled employees surveyed agreed that it is important to have a supportive manager when taking up a new role. The key role managers play is in supporting employees' development of technical skills (93%), providing feedback on performance (92%), and helping to develop workplace networks (85%).

The Social Mobility Commission also reiterated in its **State of the Nation** 2021 that if employers want to build a culture of progression they need strong, visible commitment from senior leadership and to ensure managers at all levels are offering training and holding regular career conversations.



# CONCLUSION - INVEST FOR SUCCESS

In this paper we are urging the Welsh Government to prioritise investment in management and leadership skills. This is crucial to ensure Wales' post-pandemic recovery and to move towards a more prosperous, high-skill and high-wage economy. Wales has a wealth of untapped entrepreneurial potential that can be used to boost the country's productivity and successfully deliver current and future major infrastructure projects.

Our main asks of the Welsh Government are to:

- Invest in leadership initiatives in line with the principles outlined in the [2021 CMI Comprehensive Spending Review](#).
- Increase the provision of management and leadership training across Wales.
- Support micro businesses to scale up by investing in their management and leadership capability.
- Include entrepreneurial thinking as part of the standards for leadership in Wales.
- For Welsh politicians to lead from the top, complete relevant leadership training, and clarify ownership of the leadership agenda within the Welsh Government structure.

If you have any questions or wish to discuss our proposals further please do not hesitate to contact the policy team at [policy@managers.org.uk](mailto:policy@managers.org.uk)

For any press inquiries please contact [press.office@managers.org.uk](mailto:press.office@managers.org.uk)

# TRANSFORMING ACCIDENTAL MANAGERS INTO CONSCIOUS LEADERS

CMI works with business and education institutions to inspire people to unleash their potential and become skilled, confident and successful managers and leaders. With a wealth of practical qualifications, events and networking opportunities on offer throughout the UK and Asia-Pacific, CMI helps people boost their career prospects and connect them with other ambitious professionals in any industry and sector.

CMI has more than 100,000 people training to be better managers right now. Backed by a unique Royal Charter, CMI is the only organisation allowed to award Chartered Manager status – the ultimate management accolade. CMI's thought leadership, research and online resources provide practical insight on critical issues for a 160,000 plus membership community and anyone looking to improve their skills, nurture high performing teams and help pave the way for the next generation of managers and leaders.

For more information, please visit [www.managers.org.uk](http://www.managers.org.uk) or our social media pages on [LinkedIn](#), [Facebook](#), [Twitter](#), [YouTube](#) and [Instagram](#).



## CROESO - CMI CYMRU

CMI Cymru is a volunteer Board made up of CMI members based in Wales representing a broad range of professional sectors but sharing a passionate belief that increasing the number of professionally qualified members will enable social mobility and 'levelling up'.

During 2021, the Board has been engaging with expert partners and industry bodies across the business and education spectrum to identify key recommendations that are both financially realistic (recognising the economic challenges post Covid) and bold enough to make a real difference to the long term prosperity for Wales.

Connectivity and collaboration also came out as a key recommendation from more than one of the CMI Cymru panel sessions hosted throughout 2021. On that note, CMI strongly supports the recent creation of Wales Business Council (WBC) that is intended to bring together and connect industry bodies and leaders to help 'join the dots'. We are also encouraged by the framework that is being developed by the WBC, which will include leadership as part of the Growing an Inclusive and Skilled Economy Pillar. We look forward to working in partnership with the WBC to elevate the criticality of the leadership agenda.

I use the term "initiative itus" to describe the tendency in Wales to invest and launch lots of small 'things' in silos whereas there could be huge value in connecting forums and joining the dots. I recommend, "just bringing people together and creating better business collaboration".

Professor Dylan Jones-Evans OBE BSc MSc PhD FRSA, Assistant Pro Vice Chancellor (Enterprise) at the University of South Wales





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For more information, please visit [www.managers.org.uk](http://www.managers.org.uk) or [www.managers.org.uk/wales](http://www.managers.org.uk/wales)

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