
Ymateb i Ymgynghoriad / Consultation Response

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Background information about Estyn

Estyn is the Office of His Majesty's Inspectorate for Education and Training in Wales. As a Crown body, we are independent of the Welsh Government.

Our principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000¹ and the Education Act 2005. In exercising its functions, we must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by those receiving education and training in Wales;
- Quality of leadership and management of those education and training providers, including whether the financial resources made available to those providing education and training are managed efficiently and used in a way which provides value for money;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Our remit includes (but is not exclusive to) nurseries and non-maintained settings, primary, secondary, special and all age schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning and initial teacher training.

We may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, we have set three strategic objectives:

¹ This act to be replaced by the Tertiary Education and Research (Wales) Act 2022 when the quality provisions are commenced.

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Response

Introduction

Estyn broadly welcomes the development of a new apprenticeship programme for Wales and supports the high-level principles underpinning it. We see this as a major opportunity to create a coherent, all-age apprenticeship system with clear pathways from level 2 to level 6. A single programme and network of providers would reduce fragmentation, strengthen collaboration and ensure that key stakeholders, including learners, parents and employers can easily understand the opportunities available.

Our inspection work shows that apprenticeships in Wales often deliver strong outcomes, with motivated learners, committed providers and effective partnership working. The new programme should be inclusive and aspirational, offering opportunities for learners of all backgrounds, including those with additional learning needs or groups that are currently underrepresented. Schools have a critical role in this, they must provide impartial, high-quality advice and guidance from an early age, ensuring all learners are fully aware of apprenticeships as a valued pathway.

Employers and providers should be fully involved in designing, delivering and evaluating programmes, ensuring that apprenticeships remain relevant to sector needs, responsive to future economic change and respected as high-quality pathways on par with academic routes. The content of apprenticeship programmes should reflect current training needs but also allow for amendments and new content to be introduced with a shorter lead time than is currently the case.

We also emphasise the importance of embedding essential skills, bilingualism and digital literacy in meaningful, vocational contexts. Apprenticeships should be accessible in both English and Welsh. To achieve this, the programme requires stability in policy and funding, greater flexibility in delivery and sustained investment in professional learning for the provider workforce.

Consultation questions

What is the New Apprenticeship Programme trying to achieve

Q1: Are these high level principles right for the new apprenticeship programme in Wales?

Yes, Estyn agree that the high level principles are right from which to develop the new apprenticeship programme in Wales.

The development of one apprenticeship programme (and network of providers) for all levels of apprenticeships is the biggest opportunity in developing the new apprenticeship programme from level 2 through to level 6. The previous contracting of apprenticeships to level 5 and commissioning of delivery of degree apprenticeships created a splintered network of apprenticeship providers, not conducive to creating coherent apprenticeship pathways that are clear and accessible to young people, parents, employers and other key stakeholders involved in the promotion of apprenticeships.

The grant funding element of the new commissioned programme will need to be carefully managed to ensure true collaboration between apprenticeship providers, playing to the respective strengths of each provider and building on the effective collaborative partnerships that exist currently. The current network is mature and has worked well to significantly strengthen partnership working. It will be beneficial to build on this strength.

Retaining the all-age programme is also important in recognising that apprentices can start, exit and re-enter the apprenticeship programme at various stages of their careers. This is particularly important in an increasingly uncertain economic landscape, where individuals may need to retrain or refocus careers several times though their lifetime. However, due consideration needs to be given where potential apprentices have worked in the same company and undertaking the same job for a lengthy period of time without any intention of undertaking a different role.

We agree that apprenticeships need to be inclusive and welcome initiatives that address current under-representation of specific groups.

We have identified the need to encourage and support greater use of the Welsh language in apprenticeships. We support the principle of increasing opportunities to use Welsh within the new programme and equality of access to apprenticeships in English or Welsh should be the long term aim.

Q2: How can we make the apprenticeship programme more flexible to meet learner and employer needs, including responding to economic shifts, labour market demands, regional differences and future workforce trends in Wales?

A source of frustration for employers, providers and stakeholders has been the lack of stable eligibility criteria for apprenticeship starts. While the programme has always been “all-age”, the underlying rules on length of service, age and prior achievement have shifted frequently, often annually. This creates confusion, makes medium- to long-term planning difficult and causes challenges for providers in managing relationships with employers.

The new programme should establish a clear and fair set of eligibility criteria, prioritising funding towards those who most need access. Wherever possible, these criteria should remain constant to ensure transparency and confidence across all stakeholders. A focus

should be on new entrants to apprenticeships. Currently, especially in a few learning areas and in higher apprenticeships, learners have often been employed with their employer for a considerable period of time and in a few cases have no aspiration to progress in their job roles or undertake a different role.

An apprenticeship should adapt to the needs of both learners and employers. The simplified funding model introduced in the last contracting round brought guideline completion timescales for each framework, with a notional 20% tolerance for early completions. While this helped address concerns about noticeably short apprenticeships, it does not foster a learner- and employer-centred approach. For example, in engineering manufacture, some providers and employers have designed longer, 'thinner' programmes with day release over three to four years, while others use shorter, more intensive blocks of off-the-job training. Both models meet employer and learner needs, but the current funding structure discourages this flexibility. Penalising providers financially when learners complete earlier than 80% of expected duration risks encouraging programme design driven by funding rules rather than learner progress. A new funding model should allow providers to adapt programmes while safeguarding quality through minimum duration requirements that prevent apprenticeships being condensed into a matter of weeks.

Flexibility is also needed in commissioning. Medr could retain a proportion of funding as a 'call-off' pot to address emerging and priority skills needs, building on the successful in-year priority skills funds of the past. This would allow providers to plan their annual delivery with baseline funding while still enabling a rapid response to shifting economic or regional priorities. Multi-year funding settlements should be the norm, giving providers and their supply chains stability to plan for the medium to longer term. Contracts or conditions of funding should allow for reallocation or adjustment where key performance or quality benchmarks are not met.

A barrier to flexibility is the ability of providers to recruit and retain sufficiently skilled teaching and delivery staff, particularly in areas where industry demand is growing rapidly. Providers should work more closely with employers to co-deliver learning, embedding workplace projects and industry expertise into formal teaching. There are already strong examples across Wales where providers and employers have collaborated effectively in programme design and delivery, playing to their respective strengths.

The apprenticeship content needs to be flexible to meet the current and future needs of learners and employers. Core and optional units would give this flexibility and allow units to be developed on an ongoing basis to keep up-to-date regarding current and emerging technologies and practices.

Q3: What innovations or changes would you like to see in the future apprenticeship programme to ensure it remains relevant, inclusive and impactful for the next generation of learners in Wales?

Routes into apprenticeships should be open to all, with additional support for currently underrepresented groups, learners with additional needs and those from low-income households. Clear progression pathways should link apprenticeships at various levels and connect to further and higher education, giving greater parity with full-time education pathways to employment. Employers should be involved in designing and delivering programmes, ensuring that content reflects current workplace practice and emerging industry standards.

Medr should also use this opportunity to review how to best embed the development of literacy, numeracy and digital skills for learners better into the vocational context of an apprenticeship programme, rather than a discrete set of mandatory qualifications as currently set out within the SASW. As identified in our thematic review into the [delivery of essential skills qualifications in apprenticeships](#)², although providers are effective in enabling learners to achieve their ESW qualifications currently, we found that the learning and teaching of literacy, numeracy and digital skills in apprenticeships is unhelpfully skewed towards preparation for external assessment. Three main factors contribute to this: the time that apprentices have to complete their ESW qualifications over the relatively short period of their apprenticeship, the significant learning challenge often faced by learners to develop the skills needed for their ESW assessments and an assessment model for ESW qualifications which is largely generic and requires learners to apply skills in contexts often unrelated to their vocational background. There was a consistent message from learners, providers and employers that having good literacy, numeracy and digital skills is important for life and work. However, learners strongly prefer and value learning these skills through the context of their work and vocational study. As a result, these skills should be embedded into the programme content and be vocationally specific.

Q4: What would success look like in five years' time?

In summary, success for learners would mean:

- All pre-16 learners being fully informed about apprenticeships as a post-16 option
- More learners taking up apprenticeships
- Better progression for learners into apprenticeships at a higher level
- More equitable access for learners (especially in relation to increasing representation from groups that are currently underrepresented, either generally or in specific subject areas, as well as improving access for learners living in rural areas)
- Greater use of the Welsh language in apprenticeships and more opportunities for apprentices to continue to learn Welsh
- Better opportunities to improve literacy and numeracy skills from starting points
- More protected time to complete off-the-job aspects of apprenticeships
- More timely completion of apprenticeships

In five years, a successful apprenticeship programme in Wales will be delivered by a strong and coherent network of providers. Further education colleges, higher education institutions and independent training providers will collaborate seamlessly, playing to their respective strengths rather than competing, and forming a resilient supply chain that offers learners and employers confidence and choice. This collaboration will underpin a coherent suite of pathways from level 2 through to level 6, with each stage clearly mapped so that learners can see both the entry and exit points, as well as the career destinations that each level

² <https://estyn.gov.wales/system/files/2024-02/Delivery%20of%20Essential%20Skills%20Wales%20qualifications%20in%20apprenticeship%20programmes.pdf>

opens up. Learners will have in-depth vocational experience and knowledge and contribute fully to the work of their employers and the local economy.

Schools will be key to the success of the new programme, offering genuinely impartial and independent advice and guidance about all post-16 options and ensuring that statutory education prepares learners appropriately to step into the world of work through an apprenticeship at 16 years of age. Apprenticeships will enjoy true parity of esteem with equivalent qualifications, giving young people and their families confidence that whichever route they choose, they are valued and recognised.

Provision will be flexible and tailored to the needs of every learner, taking account of individual needs. There will be progress in addressing the current underrepresentation of specific groups of learners in apprenticeships as a whole or in specific subject areas. Opportunities will be open to all types of employers, from the largest anchor companies to the smallest SMEs.

Diverse entry routes will exist, with junior apprenticeships, Voluntary, Community and Social Enterprise (VCSE)-led pathways and employability programmes helping to bring in new cohorts of learners who might otherwise be excluded.

Success will also be measured by outcomes: high levels of timely attainment and progression to higher levels of study, training and employment and evidence of improved social mobility and inclusion. Providers will be responsive to economic shifts, new and emerging skill needs and the rapid adoption of modern technologies, including artificial intelligence. Key data to recognise progress and inform planning would include the number of learners who remain in employment in the same industry and those who change the industry they trained in.

Funding mechanisms safeguard apprenticeship funding towards new entrants and those that are learning new skills through training, either whilst entering a new trade or profession, or through progressing into new roles or roles at higher levels that require the development of new knowledge and skills.

Q5: Does the definition of a Welsh apprenticeship set out what the new Programme needs to deliver?

‘An apprenticeship is a paid job with training. Apprentices gain experience, learn new skills and gain a nationally recognised qualification while earning a wage. This is defined through an apprenticeship framework.’

Although the definition sets out what the new programme needs to deliver, and the key message within the definition is that apprentices will learn **new** skills, it would be helpful to add ‘through high quality training’ before ‘while earning a wage’.

It is particularly important to safeguard apprenticeship funding towards new entrants and those that are learning new skills, either whilst entering a new trade or profession, or through progressing into new roles or roles at higher levels that require the development of new knowledge and skills. Apprenticeship funding should not be available for use as a mechanism for employers to recognise existing skills of their workforce through formally accredited qualification and apprenticeship frameworks. This is a particular risk in sectors where there is a legislative requirement for employees to hold formal qualifications, such as in the adult social care sector, or where larger, apprenticeship levy-paying employers look to get a return on investment for their levy payments by accrediting the existing skills of their

workforce through programmes such as leadership or project management, funded through the apprenticeship programme. Medr should consider how it commissions programmes that safeguards against the definition of the apprenticeship. Examples could include mandating elements of programmes to be delivered off-the-job, where apprentices are learning new skills and knowledge, away from the day-to-day activities in the workplace. This would ensure consistency in entitlements across all levels and learning areas from level 2 to degree apprenticeships.

Apprenticeship Sector Frameworks

Q6: Are these sectors right to meet the needs of the economy and learners?

Yes

The refined list of sectors are fit for purpose and a better representation of the apprenticeship programme than the current list of Sector Subject Areas (SSAs). Separating out what was previously SSA1 – which accounted for up to 40% of all apprenticeship starts annually - into three separate sectors (care, education & early years; health and science) is important due to its size and complexity. The refined set of sectors will allow providers and regulators to effectively measure and monitor the performance and the proportionate representation of each of these important elements in the overall apprenticeship programme.

Q7: Are there any broad occupational sectors that you would expect to see that are not included?

No

Q8: How should sector frameworks evolve to reflect emerging industries, skills needs and regional priorities within Wales, what is the evidence base for this?

One of the challenges faced by providers in meeting the specific skills needs of employers has been the inability to fund and deliver additional, sometimes non-accredited elements within apprenticeship frameworks i.e. vendor type qualifications. This is particularly important as new skills emerge in areas such as green skills (retrofit, electric vehicles, heat pumps), vehicle technologies (electric and hybrid vehicles) and digital/AI-enabled roles. Often the skills required in these emerging sectors are bitesize in nature and complement existing qualifications/frameworks, rather than requiring entirely separate new programmes. The new programme could build in a fundable element to programmes that is agile and responsive to sector specific needs including bitesize, vendor and non-accredited training. If programmes comprised of core units supplemented by a larger number of optional units that can be routinely added to over time providers and employers would have the flexibility they need. It could also potentially cut down on the overall number of different programmes that are needed and ensure simpler communication of pathways.

Learners

Q9: What aspects of the current learner journey in apprenticeships work well and where do you see opportunities for improvement to better support learners throughout their learning?

Over the last three years, inspections of all ten lead providers of apprenticeships in Wales has shown what is working well and what could be improved.

What is working well:

- Learners benefit from engaging and well-structured teaching and assessment that uses real-world contexts, digital tools and questioning to build both practical and higher-order skills.
- Most apprentices are motivated, confident communicators who make sound progress and add value to their workplaces.
- Support for learners with additional learning needs (ALN) is a strong feature, with diagnostic assessment, personalised strategies and inclusive practices helping them succeed.
- Well-being and pastoral care are consistently strong, with learners feeling safe, supported and able to raise concerns. Access to mental health, financial and digital support services is broad and responsive.
- Strong relationships with assessors are often a key factor in maintaining motivation and progress.

What could be improved:

- Planning and target-setting is inconsistent, meaning some learners are not stretched sufficiently and can become overly reliant on assessors.
- Too many apprentices complete later than planned, particularly in sectors such as health and social care, where employer release time remains limited.
- Development of literacy, numeracy and digital skills is sometimes too focused on assessment requirements rather than practical workplace use.
- Learners' use of the Welsh language and uptake of Welsh-medium assessment remains low, despite growing staff capacity.
- Learners' understanding of radicalisation and extremism is underdeveloped, as opportunities to revisit these themes beyond induction are limited.
- Consideration could be given as to how continued support in relation to ALN is protected for younger apprentices, who may be studying in off the job training programmes with peers who do have a statutory entitlement to additional learning provision and support through an IDP due to being in full time education.

Q10: What outcomes should be prioritised for apprentices (e.g. sustainable employment, qualifications) and how can these be effectively measured and supported?

Outcome	Measure / how to support
Attainment rates	Overall framework attainment rates have been historically a useful measure of provider effectiveness for apprentices. Through our inspection activity, we have seen the national apprenticeship attainment rates grow significantly over the course of the last two

decades. These are and can continue to be measured by annual provider data returns.

Timely completion rates	Timely completion rates are not currently centrally captured or published but are an important key quality indicator that supplement overall apprenticeship completion rates. For example, if a provider has high framework attainment rates, but a sizeable proportion are taking several months longer to complete their programmes than they and their employers were expecting, this needs be factored into the learner experience and how effective the provider's delivery is. Through our inspection activity and link inspection work, we have identified the timeliness of apprenticeship completion as a significant area for improvement within apprenticeship providers. We are this year undertaking a focus on timely completion rates as part of enhanced apprenticeship provider link visits, with a planned insights report to follow. This can help Medr consider how this measure may support the future apprenticeship programme in Wales.
Progression to sustained employment or higher levels of learning / apprenticeship	Not currently captured but could be a key measure supporting by destination models like those progressing from other programmes i.e. FE/school/employability programmes. Use of a better unique identifier which can stay with individuals through statutory education and into further or higher education and employment would allow a much deeper understanding of the successful impact of education and training, including apprenticeships over time.
Progression from school or pre-apprenticeship programmes (i.e. junior apprenticeships, employability pathways)	The new apprenticeship programme could benefit from recognising an effective outcome as being a learner that has progressed from school or other recognised pre-apprenticeship route. This should be seen as a positive outcome, both for the apprenticeship provider, but also from the provider of the pre-apprenticeship or school, with equal measure for a learner progressing into an apprenticeship than into other forms of further or higher education.

Overall, an evaluation of outcomes is most effective when it is not based on one or two performance measures but takes account of a range of data. Using a range of data makes it less likely that providers will behave unhelpfully by seeking to influence performance measures.

Q11: How can we attract more and/or a wider cohort of apprentices, regardless of background or starting point into the programme?

To attract a wider and more diverse cohort of apprentices, regardless of background or starting point, we need to focus on the role of effective, impartial advice and guidance in schools. Careers advice must begin early, be of high quality and be inclusive for all pupils—not just those deemed 'non-academic' or those whom schools prioritise for traditional sixth form or university pathways. This ensures that every young person is fully informed about the range of opportunities available to them, including apprenticeships, and can make choices that suit their interests, talents and ambitions.

A critical part of this is strengthening partnerships between schools and apprenticeship providers. Schools should work closely with providers to develop clear and transparent pathways that pupils and their families can understand and trust. This might include 14–16 collaborative vocational programmes that introduce young people to practical skills, as well as progression routes from VCSEs into formal apprenticeship programmes. Importantly, this

approach must be universal. Apprenticeships should be presented as a high-quality route open to all learners, regardless of ability or background and positioned alongside academic routes as equally valid. Local authorities have a key role to ensure that schools engage proactively in these partnerships to ensure the most appropriate progression pathways for pupils. It may be helpful to hold local authorities to account for attracting a wider cohort of apprentices as part of their overall skills and economic development strategies.

The apprenticeship vacancy service is intended to be the 'one stop shop' where providers and employers are encouraged to advertise their apprenticeship vacancies. However, in practice, very few providers and employers use this service and, as a result, apprenticeship vacancies advertised on the site are generally limited. Such a platform would be of great value to all stakeholders in apprenticeships, however, there needs to be more rigour placed on providers to support their employer partners to advertise apprenticeship opportunities through the service.

In the Estyn review of the current 16-19 curriculum in Wales, we found substantial differences in the options available to learners within their local area after they complete Year 11. The available options are also strongly influenced by a learner's preferred language choice and educational attainment. Overall, current arrangements for curriculum planning and delivery are not working well enough. There is no clear national strategy for 16-19 learning and too much inconsistency between and within, areas and providers. We also found that learners' awareness and understanding of the choices available to them varied considerably depending on the quality of information and advice provided to them. Too many learners lacked awareness of work-based learning opportunities such as apprenticeships.

Apprenticeship ambassadors—young people and adults who have successfully completed or are currently undertaking apprenticeships—play a vital role in raising aspirations. "If you can see it, you can be it" is especially important in challenging stereotypes and broadening participation across gender, ethnicity, disability and socio-economic background. Schools, providers and employers should work together to highlight diverse ambassadors who can inspire pupils to see apprenticeships as an achievable and respected route.

Employers / industry

Q12: How can we widen the number and range of employers offering apprenticeships, especially SMEs?

The inherent risk where providers use repeat employers for regular cohorts of learners is the over-reliance on large employer contracts versus engaging with the smaller to medium size enterprises who typically will not have the resources or offer the economy of scale of apprentice recruitment. This is a particular risk as providers are responding to cuts in funding and are having to make difficult cost-saving decisions on where to allocate their resources.

Some options for widening the range of employers offering apprenticeships could include:

- Limiting the number of starts for a single employer per year i.e. the anchor companies. This could prove to be difficult to navigate with the complexities of the apprenticeship levy contributions these employers will be making.
- Offering wage or sustained employment incentives for SMEs that recruit apprentices. Would need careful implementation to ensure that financial incentives reward sustainable

opportunities and do not create a 'revolving door' of apprentices where employers maximise incentive payments.

- Considering how shared apprenticeship programmes in the constructive and creative sectors have supported SMEs to host apprentices for elements of their programmes and how similar approaches could be used across other apprenticeship sectors where smaller employers do not have the breadth of work available to employ an apprentice for a full programme.
- Ensuring that providers have the capacity to support SMEs to act as liaison with schools/pre-apprenticeship programmes on behalf of smaller businesses. This could be facilitated through employment/careers hubs and would include advertising vacancies and linking potential apprentices with employers.
- Developing engaging and informative materials tailored to schools, employers and learners.

Q13: How can employers be more effectively engaged in the design, delivery and evaluation of the apprenticeship programme to ensure relevance and impact?

Employers of all sizes should be involved systematically in shaping apprenticeship frameworks so that programmes reflect current and emerging sector skills needs. Representation at relevant advisory boards or framework development groups should be proportionate to the makeup of a particular sector, not dominated by those larger employers that often have the capacity to contribute more regularly.

Employers should have structured opportunities to feed into the evaluation of apprenticeship programmes through feedback mechanisms, including regular surveys.

Q14: How can businesses be better supported when working with an apprentice? What information would be useful to employers, prior to taking on an apprentice and during the apprentice's learning journey?

Employers need straightforward guidance on the practicalities of taking on an apprentice: funding arrangements, contractual responsibilities, expected time commitments and the support available from providers and government. We have seen that currently, employer involvement in apprenticeship programmes is too variable, with insufficient participation in progress reviews and limited time given to apprentices to attend off-the-job training in some sectors.

In the best cases, we see that employers benefit from a dedicated point of contact within the training provider or to provide advice, troubleshoot issues and ensure the programme stays on track. They receive regular updates on the apprentice's progress—covering both technical learning and personal development—which helps employers to integrate the apprentice more effectively into their workforce. Apprentices' experiences in the workplace are often based on the experiences of the person or people who they routinely work with. As a result, the experiences of apprentices can be variable. A designated workplace mentor/coach would be a positive step forward. An approach could be to validate such staff by them attending a short mentor/coach training session to allow them to secure information and guidance regarding what good mentoring and coaching looks like.

Other options that could better support business working with apprentices:

- Professional learning opportunities for line managers and workplace mentors could help support apprentices in the workplace, ensuring they receive high-quality support guidance.
- Peer networks and forums for employers could help share good practice, particularly for SMEs taking on apprentices for the first time.
- Clearer, more accessible information about apprenticeship pathways and progression opportunities available for apprentices.

Q15: How can we ensure a programme that supports regional economic development and place based skills planning?

Through our inspection activity, generally we find that lead providers of apprenticeships plan their provision well to meet the needs of their local communities and regions. They are generally well informed by and well represented at regional skills partnerships, industry forums and often have developed their own employer boards to influence the apprenticeship pathways they deliver. We see that providers are responsive and adaptable to emerging skills needs, for example, the incorporation of electric and hybrid technologies into motor vehicle apprenticeships, or the skills required for renewable heating technologies in construction apprenticeships.

There are, however, very few examples of regional collaboration between providers and regional skills partnerships to clearly map provision and progression pathways. This makes it challenging for existing or potential apprentices to get a full and impartial understanding of what pathways are available to them in their region. Stronger sector partnerships, regional skills partnerships and employer advisory groups would help align provision with local and national economic priorities. There is also an opportunity in the development of a new programme to build in more flexibility to allow providers to better respond to these needs as detailed earlier in the response.

Learning Providers

Q16: How can providers be more effectively engaged in the design, delivery and evaluation of apprenticeship programmes to ensure relevance and impact?

Providers bring first-hand expertise in pedagogy, learner support and assessment. Their early engagement in developing apprenticeship frameworks ensures programmes are not only aligned with employer needs but also deliverable, inclusive and high quality. Programmes should be co-designed with employers, providers and government with providers helping shape curriculum content, entry requirements and progression pathways. Provider staff would have the expertise and experience to develop and write delivery and assessment units if that were the approach taken in any new apprenticeship programme content.

Providers should work more closely with employers to co-deliver learning, embedding workplace projects and industry input into formal teaching.

Providers should fulfil their obligation to fully support their learners, especially in health and social care. These providers need to make sure learners access off-the-job activities as part

of their working week and access in the workplace support as with most other apprenticeship programmes. The new programme should redevelop the apprenticeship learning agreement that all parties commit to undertake, for example including a minimum required amount of release for off-the-job learning. This would support a more consistent approach and support the wider network to work more collaboratively to address where employers are not meeting this obligation.

Stronger collaboration across providers—sharing resources, expertise and facilities—would help widen access to specialist training and improve regional equity of provision.

Providers should have structured opportunities to feed into the evaluation of apprenticeship programmes, using their data on learner voice, progress, completion and destinations.

Joint evaluation processes (involving learners, employers and providers) would give a fuller picture of programme impact and highlight areas for continuous improvement.

Providers need access to ongoing professional development to ensure staff stay up to date with industry standards and pedagogy. Ongoing strategic investment in infrastructure and digital tools will help providers deliver innovative, flexible, individualised apprenticeship models.

Q17: What is working well and what needs to be strengthened from a provider perspective?

Over the last three years, inspections of all ten lead providers of apprenticeships in Wales has shown what is working well and what needs to be improved.

What is working well:

- Senior leaders set clear strategic priorities aligned with national and regional policy and demonstrate a strong commitment to collaboration and improvement.
- We have seen particularly good examples of effective partnership working within consortia of apprenticeship providers. Where all partners place the learner experience central to all activities and fully contribute to all aspects of the consortium's work in a positive and meaningful way. The inclusive leadership cultures across the consortia are supportive, collaborative and underpinned by shared values, helping address local, regional and national skills needs. Medr should consider carefully how a grant funded funding model may look to retain some of this effective collaboration that has been built up over the past decade
- Self-evaluation and quality assurance are well established, with governance structures providing clarity and accountability.
- Professional learning is a sector strength, with regular training in pedagogy, safeguarding, bilingual delivery and inclusive practice.
- Providers respond well to emerging skills needs, for example in green technologies and health sciences, through partnerships with employers and regional skills bodies.

What needs to be improved:

- Employer involvement in apprenticeship programmes is too variable, with insufficient participation in progress reviews and limited support for off-the-job learning.

- Improvement planning does not always include clear or measurable success criteria, particularly around timely completion.
- Financial pressures and fluctuating learner numbers present growing sustainability challenges, requiring providers to balance efficiency with maintaining quality.
- Whilst professional learning has increased capacity for bilingual learning, this is not having enough impact on the proportion of learners using Welsh regularly and completing their assessments in Welsh.

Welsh Language

Q18: Do our high level principles for the new Apprenticeship programme have any positive or negative effect on:

(a) opportunities to use the Welsh language and

(b) treating the Welsh language no less favourably than the English language

in particular;

• How can we encourage a higher take up of Welsh medium provision and bilingual workplace opportunities across Wales?

Apprenticeships should be presented in schools as a bilingual pathway from the outset, so that Welsh-medium options are visible and aspirational.

Employers need clear information about the business and cultural benefits of offering bilingual apprenticeships such as improved customer service, staff retention and community engagement.

Additional support should be provided to employers and providers who commit to delivering Welsh-medium provision, for example through targeted funding or shared resources.

Medr could work with the sector to identify and promote apprentice ambassadors that are Welsh-speaking, have learnt bilingually or have simply improved their Welsh language skills because of their apprenticeship programme to the benefit of them and their employer.

Providers should work closely with the Coleg Cymraeg Cenedlaethol to access sector-specific support and advice.

• How can the Welsh language skills, particularly for the workplace, be more meaningfully embedded more broadly into apprenticeship programmes to support bilingualism, respond to employer need and cultural identity across sectors?

All learners on apprenticeships should be able to develop their Welsh language skills whilst on their programme. Apprenticeships should embed opportunities for the development of sector-relevant Welsh language skills directly into the vocational context of the employer, focusing on vocabulary, communication and customer-facing scenarios that reflect real work contexts. Much like through embedding literacy, numeracy and digital skills, learners strongly prefer and value learning these skills through the context of their work and vocational study.

Employers and providers should work together to identify the specific Welsh language skills relevant to their sector, ensuring training is meaningful and practical.

Q19: Are there any considerations for us to take into account that would have a positive impact on:

(a) opportunities to use the Welsh language and

(b) treating the Welsh language no less favourably than the English language

In our [Thematic Report: Increasing the use of the Welsh language in the post-16 sectors](#)³ (March 2025) we highlighted areas for improvement across the further education and apprenticeship providers required to grow the present bilingual and Welsh-medium offer.

There were two recommendations for further education colleges and apprenticeship providers to assist in upskilling the language capacity of the workforce:

- Work with Coleg Cymraeg Cenedlaethol to ensure consistency in the way in which practitioners are allowed to attend training and language lessons with the aim of ensuring that they have non-contact time in their teaching timetables to undertake them without adding to their workload. The main barrier for staff who wish to attend training is the lack of time or time pressures. This is particularly true for courses on the Work Welsh programme. Line managers are not always willing to release staff. In most cases, staff also must attend courses on top of their teaching hours or other normal duties, which affects their ability to join and complete courses.
- Continue to refine their professional development offer for practitioners to increase their Welsh language skills and bilingual pedagogy with the strategic aim of moving staff and students/apprentices along the language continuum purposefully. With the exception of a very few institutions, colleges and apprenticeship providers need to extend the good work they have undertaken in terms of increasing the use of 'a small amount of Welsh-medium learning' in learning activities to aim for higher levels of the language pyramid or continuum to realise the aims of policies such as Cymraeg 2050.

Q20: Are there any other considerations for us to take into account so that the design of the new programme would not have adverse effects, or which would reduce adverse effects on:

(a) opportunities to use the Welsh language and

(b) treating the Welsh language no less favourably than the English language

To grow the numbers of apprentices who use and improve their Welsh language skills, the offer to study bilingually or through the medium Welsh should be proactively made by providers and not rely on prospective apprentices requesting it.

The ability to work through the medium of Welsh should be recognised and promoted as a worthwhile skill that adds value to apprentices' employment prospects. It can also provide them with a unique selling point if they decide to become self-employed enabling them to

³ <https://estyn.gov.wales/improvement-resources/thematic-report-increasing-the-use-of-the-welsh-language-in-the-post-16-sectors/>

market themselves to customers that wish to choose Welsh-speaking tradespeople where possible.

Inclusive apprenticeships

Q21: What barriers currently exist for underrepresented groups in accessing and succeeding in apprenticeships and how can the design of the new programme address these challenges and encourage retention of learners?

Estyn has identified that underrepresented groups face a mix of practical and cultural barriers in accessing and succeeding in apprenticeships including:

- Inequitable access to timely and sufficient information and guidance
- Uneven provision across Wales
- Real or perceived discrimination, e.g. on gender, race, disability
- Hidden costs, e.g. for travel, equipment and workwear
- Inequitable digital access
- a lack of visible apprenticeship role models making it harder for prospective apprenticeships to see themselves succeeding
- Language, cultural or communication barriers
- Eligibility criteria including age and how long someone has held a role
- Inflexible delivery models
- Inconsistent inclusive practice and understanding of support needs
- Inconsistent procedures for the identification and subsequent care, support and guidance for learners at risk
- Inconsistent rigour in self-evaluation processes to identify inequalities in access and outcomes.

The new programme should respond with inclusive promotion, fair eligibility, targeted financial support and stronger employer–provider collaboration to create an environment where every learner can succeed and progress.

The number of apprentices in Wales identified as having additional disability and/or learning difficulty has increased steadily over recent years with a significant rise in 2022/23. This aligns with an increase in autism diagnoses and growing awareness of how neuro-divergence affects learning. Through our inspection activity, we have seen significant improvements amongst providers in the capacity and ability to identify, diagnose, support and progress these learners as highlighted in [several case studies published from our recent cycle of apprenticeship inspections](#)⁴.

Learners from ethnic minority backgrounds have been historically underrepresented in apprenticeships. However, the picture has improved considerably in recent years. Between 2018-2019 and 2021-2022 the proportion of new starts by learners from ethnic minority backgrounds increased gradually from 3.1% to 4.9%. In 2022-2023, this more than doubled to 10.2%. Whilst there is no published data to identify the specific subject sectors accounting

⁴ <https://estyn.gov.wales/improvement-resources-search/?type=effective-practice>

for this increase, our inspection activity has identified that the health and social care sector has seen a substantial increase in learners from ethnic minority backgrounds, often accessing apprenticeship roles through employer sponsorship schemes. In a very few cases, providers have not adapted their provision well enough to cater for more diverse apprentice cohorts, specifically not supporting learners well enough for whom English is not their first language whilst accessing off-the-job sessions.

Historically, there has been significant dominance of either male or female apprentices in a number of sector subject areas. There has been concerted effort to try and redress the balance in some sectors, particularly in recent years for females into science, technology, engineering and mathematics (STEM) and construction apprenticeships. Females historically are most underrepresented in engineering, construction and manufacturing.

The new programme offers the opportunity to review how best to embed the development of key literacy, numeracy and digital skills for learners from underrepresented groups. The current ESW requirements within the SASW are a barrier, particularly related to assessment models and accessibility limitations for learners from underrepresented groups.

The new programme should ensure that providers continue to actively support employers in recruiting more diverse cohorts, through awareness raising and supporting a fair and equitable recruitment into apprenticeship vacancies. They should also demonstrate how they sensitively evaluate the learning journey of apprentices from under-represented backgrounds, ensuring that apprentices feel a sense of safety and belonging and that their programme has been tailored to their individual needs.

Q22: What targeted recruitment strategies can support participation from under-represented groups?

We suggest that targeted recruitment strategies could include:

- Targeted outreach campaigns tailored to local labour market opportunities to schools, colleges, youth work services, third sector organisations and care networks to ensure underrepresented groups receive timely, clear and sufficient careers information and advice particularly in areas of higher deprivation and rural communities.
- Simplified multi-lingual resources with case studies and frequently asked questions addressing known key areas of concern for underrepresented groups.
- The use of alumni with lived experience as apprentice ambassadors to challenge stereotypes promoting the notion 'if you can see it, you can be it.'
- Encouraging employers to adopt inclusive recruitment methods such as contextualised recruitment, simplified application processes and outreach beyond traditional advertising channels.
- The provision of awareness raising and professional learning for employers on accessibility and inclusive workplace practices including understanding sensory differences and meeting learning needs.

Q23: Do the proposals have any positive or negative impacts, or unintended consequences, in terms of equality, diversity and inclusion? What good practices could you share?

No. However, implementation factors will be influential, such as:

- The detail within grant agreements and the extent to which funding principles reflect potential higher delivery costs for apprentices with protected characteristics e.g. assessments of needs, specialist support and reasonable adjustments
- Accountability and monitoring requirements, including those relating to data collection and self-evaluation.

We have provided examples of good practice in response to previous questions.

Q24: Should we continue to fund the supported apprenticeship programme and the Employer Incentive Scheme? Please explain your answer.

Yes. However, Estyn's recent evidence suggest that they can be sharpened. The introduction of the new programme will allow for a refresh of supported apprenticeships to better align with entry and exit opportunities. A supported apprenticeship should ideally include:

- Early identification of additional support needs (learning difficulties, disabilities, literacy/numeracy gaps)
- In-built and coordinated mechanisms from trained job coaches and other specialist support
- Adjustments and differentiated strategies in teaching and assessment
- Engagement and commitment from employers to provide necessary time, adjustments and support
- Ongoing monitoring and intervention if learners fall behind
- Opportunities for learners, including those exempt from some requirements, to continue to develop literacy, numeracy and digital skills
- Flexibility in delivery models (blended, on-job/off-job) suited to learner needs
- Bilingual / Welsh-medium options where appropriate
- Clear pathways and transitions
- Effective collaboration between schools, colleges, local authorities, employers

Supported apprenticeships provide an important pathway for learners with additional support needs and those who face significant barriers to work. They offer structured support, specialist provision and tailored learning, enabling these learners to gain skills, qualifications and meaningful employment opportunities.

Our inspection activity across all lead providers over the last three years has identified very few examples of supported apprenticeships being delivered. Bringing these shared

apprenticeship programmes within the scope of the new arrangements would be important to ensure equity of access to these pathways across Wales and a chance to share practice and improve learner experiences and opportunities.

We therefore agree that continued funding is necessary to avoid apprentices being excluded from opportunities and recommend that Medr reviews how effectively the current programme is being targeted and delivered against annual target profiles. This should include consultation with the full range of stakeholders including individuals and organisations from under-represented groups to build understanding of the reasons for low engagement with the programme.

Similarly, the Employer Incentive Scheme is a valuable lever in encouraging employers and particularly SMEs who may be new to apprenticeships, to create opportunities that may not otherwise exist in various parts of the country. We support its continuation, alongside regular review of incentive levels, conditions and alignment with the suggested wider support, training and guidance for employers outlined above to ensure it remains fit for purpose. This will balance the need to attract new employers and increase opportunities with the imperatives to enhance retention and achievement and demonstrate value for public investment.

Q25 : Are there other options in addition/instead that would help support inclusive apprenticeships more?

Estyn's recently published thematic review of the [Independent Living Skills \(ILS\) Curriculum in Further Education](https://estyn.gov.wales/improvement-resources/the-independent-living-skills-ils-curriculum-in-further-education-building-a-person-centred-skills-based-curriculum/)⁵ identified how the differing expectations of learners, employers, colleges and employment agencies are inhibiting the success of the supported internship study programme. Medr should accommodate the findings of this review into planned revised curriculum offers and progression routes.

The new programme should ensure the incorporation of learner voice mechanism targeting under-represented groups, so their voices are heard and issues flagged and addressed early.

Medr should consider evidence on the efficacy of supported shared apprenticeships in securing routes to paid employment for people with learning difficulties and disabilities and whether the existing models of supported and inclusive apprenticeships would benefit from accommodating this model to meet a wider breadth of learner need and increase employment rates.

Medr should explore how flexibility within inclusive apprenticeships in the new programme can meet the needs of the increasing number of learners arriving in FEIs having not achieved level 1 or above, including those arriving having experienced education other than at school.

Q26: What could we do to support participation in apprenticeships for those who are under-represented?

⁵ <https://estyn.gov.wales/improvement-resources/the-independent-living-skills-ils-curriculum-in-further-education-building-a-person-centred-skills-based-curriculum/>

Providers have strengthened identification and support for apprentices learning needs, including specialist coordination and faster access to support; this has increased the number of learners identified and supported and improved responsiveness. To further support participation, Medr should:

- Develop pre-apprenticeship programmes that provide stepping-stones into full frameworks for those furthest from the labour market i.e. supported internships, employability programmes.
- Strengthen links with vocational programmes (14–16) and VCSE initiatives to widen entry routes.
- Require the availability of specialist support staff and interpreters during recruitment and induction
- Ensure the availability of modular and part time options to accommodate the needs of disabled apprentices, those with health conditions and caring responsibilities
- Consider introducing national standards for inclusive practice in apprenticeship recruitment and delivery
- Share best practice, evidence of what works and inclusive recruitment models
- Consider how to support access to apprenticeships for learners living in rural areas