

Medr/2025/17: Apprenticeship Programme in Wales: Consultation

31 October 2025

Introduction

About Skills Federation

[Skills Federation](#) brings together the shared perspective of different industries on how the UK can build a workforce able to meet our skills needs. Our members are 18 employer led sector skills bodies who work across more than 20 sectors of the economy and represent over 150,000 employers, both large and small, across the UK. They are funded by their industries to provide sectoral voices and vital support on skills issues. This includes workforce planning and intelligence, professional standards, tailor made skills solutions, qualifications, kitemarking, accreditation and quality assurance.

Skills Federation is the designated Certifying Authority for Apprenticeship Frameworks in Wales and certified 13,567 apprentices in 2024-25 through our online system, [ACW – Apprenticeship Certification Wales](#). We also provide [ACE360](#), an industry-wide end point assessment platform that supports training providers and end point assessment organisations in England and in Scotland, we are responsible for the registration and certification of Modern Apprenticeships through [MA Online](#).

Skills Federation's response

We are pleased to respond to the consultation because ensuring that any reform to apprenticeships delivers better outcomes for apprentices, businesses and the UK economy is one of our key priorities. Our response focusses on those questions where we, along with our members, can represent the views of employers.

Key points that underpin our response include:

- A key concern for employers is occupational competence. Our reflections and recommendations are focused on ensuring that apprenticeships in Wales continue to deliver this for learners and for industry.
- Employers will engage where apprenticeships add value for their business but are more likely to do so if it is relatively straightforward. Ensuring ease of access should be a priority in the reforms.
- Careers information advice and guidance is essential to increase the numbers of apprentices and to widen access. A UK wide careers strategy is required to set the direction and purpose of career development for young people and adults.
- Policy stability is important, and we would urge Medr to make changes to apprenticeships in Wales which will be appropriate for the long term.

Contribution of Skills Federation and members

We have also taken opportunities to suggest where Skills Federation and our members can add value to the Welsh skills system. As the Certifying Authority we are already an integral part of the apprenticeship system, as are our members who operate as certification bodies. We are keen to build on this and for Skills Federation and our members to become strategic partners to Welsh Government to help improve the skills system.

A more strategic role would help to harness the significant expertise and knowledge that exists within sector skills bodies and enable the activities they carry out to have a more formal and secure role within the system. These activities include:

- Drawing on their comprehensive employer engagement to provide feedback on the detail of apprenticeship frameworks.
- Extensive promotion of the benefits of taking on apprentices across the significant employer membership and contact bases.
- Support for the employer/provider ecosystem including responding to technical questions on the detail of frameworks, creating resources and facilitating sharing effective practice.
- Collection and curation of labour market insights which are used to ensure that apprenticeship frameworks are current and relevant for their sectors.
- Creating and reviewing national occupational standards.

Skills Federation is also able to provide intelligence across sectors where there is commonality, in addition to sector specific information to illuminate both differences between sectors and areas of effective practice. We are already working closely with the government in England to inform development of skills policy and there's potential for us to collaborate more closely in Wales to support similar activities.

Both Skills Federation and our sector skills body members operate across the UK. This provides a significant opportunity to provide insights which can help to better coordinate activities across nations. This could help to mitigate the current risks employers identify in working across borders.

Responses to the questions

What is the New Apprenticeship Programme trying to achieve?

1. Are these high level principles right for the new apprenticeship programme in Wales?

We broadly agree that the high-level principles are right for the new apprenticeship programme in Wales. We especially welcome the focus on responding to changing skill demands across the economy and regional skills needs. The labour market is evolving quickly, particularly in response to advances in technology and to meet the targets for net zero, and new jobs are being created as others disappear. We would suggest that Medr considers evidence for expanding apprenticeships up to level 7 to support increased growth and to widen opportunity for individuals.

Labour market forecasting is notoriously challenging, and it will be important that a range of data sources are used. Employer-led sector skills bodies have a wealth of labour market intelligence and insights and can effectively support policy decisions, planning and delivery.

Occupational competency is a key concept for employers and apprenticeships are a credible and valued way of demonstrating this. Medr should consider making this more explicit in the principles.

2. 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?

We support the aim to increase flexibility to meet learner and employer needs across sectors and places. This will need to be balanced with ensuring enough commonality that apprenticeships are recognised as the standard for occupational competency wherever they are delivered. This also needs to be done in a way which maintains the focus on quality of apprenticeships.

A greater degree of modularisation in delivering apprenticeships could help achieve this and should be explored. This would provide more options within one apprenticeship framework to qualify people to work in different industries. For example, a lab technician apprenticeship with flexible modules could enable people to work in labs in different sectors like chemical, biotech etc.

3. 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?

National Occupational Standards (NOS) underpin qualifications that are part of apprenticeship frameworks in Wales. The plans to introduce both pan and multi sector NOS could also help to increase the level of flexibility. Increases in the use of technology mean that boundaries between sectors are becoming increasingly blurred and so frameworks underpinned by pan and multi sector NOS might be particularly useful for people who want to move between sectors.

4. What would success look like in five years' time?

We agree that this question is essential, and we welcome it being included in the consultation. In line with a Theory of Change model the impact that is sought to be achieved should be identified first and from there the outcomes and measures can be developed. This would help the apprenticeship programme to be scoped to maximise impact and to provide clarity about the intended purpose.

Measures for success in five years' time could include:

- Apprenticeships contributing to an increase in economic growth.
- Reduction in skills gaps and skills shortage vacancies.
- Higher number of apprentices.
- Broader access for a wider range of apprentices.
- Delivery of apprenticeships responds to employer demand.
- High levels of satisfaction from both apprentices and employers.

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

We think the definition of a Welsh apprenticeship is broadly right but that this could be strengthened through a more explicit link to occupational competence. We propose the wording below for consideration:

"An apprenticeship is a paid job with training. Apprentices gain experience and a nationally recognised qualification while developing the skills, knowledge, and behaviours needed for occupational competence. The requirements are defined through an apprenticeship framework."

Apprenticeship Sector Frameworks

6. Are these sectors right to meet the needs of the economy and learners?

The sectors look largely right. However, these are broad definitions and it will be important that the way navigation works on the apprenticeship [framework library](#) supports individuals and employers to be able to identify specific frameworks.

We agree with the approach of reviewing all existing apprenticeships frameworks to ensure they are up to date and take account of likely future skills demands. In doing this it will be important to consider the sectors but also that there is considerable duplication and inter-connectedness between sectors, for example, medicine manufacturing where there is a crossover between advanced manufacturing and life sciences. Whilst definitions are important, the complexity of the economy also needs to be reflected.

Relatedly, SMEs don't always fit neatly into sectors or sub-sectors and there is a higher proportion of small businesses in Wales compared to other parts of the UK. SMEs play a key role in supply chains, and it is crucial to consider them when developing policy, especially since they are less likely to invest in staff development.

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

It would be helpful for Medr to consult on the detail of this with sector skills bodies who understand what might be missing for their industries. Two examples are provided below:

- Workforce Development Trust highlighted that the role of 'Nursing Associate' has been introduced in Wales. To avoid reliance on training from other parts of the UK, Medr could consider developing an apprenticeship framework for this occupation.
- Cogent Skills highlighted that the following apprenticeships are missing: Polymer Processing, Nuclear Operative and Signmaking.

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

In addition to the range of national data sources that form part of an evidence base, there is also data and information from sector skills bodies. They have rich labour market intelligence, including in emerging sub sectors, which is already being used by government to better understand labour market and skills needs. For example, sector skills bodies including Energy and Utility Skills and CITB provided the data for the Green Jobs Delivery Group. Cogent Skills, as part of the [Hydrogen Skills Alliance](#), developed the Hydrogen Skills Framework which articulates specific hydrogen training needs. This is an open-source resource to support standard setting and the development of training and qualifications across the UK.

We would be happy to work with Medr and our members to help ensure a rich evidence base is available to inform policy and implementation decisions.

Learners

9. 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?

We do not have views to contribute in response to this question

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

Please see our response to question 5 which covers our response to these points.

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

Effective career information advice and guidance is essential to recruit a wider cohort of apprentices. To bring this about Skills Federation have recommended a new careers strategy to set the direction and purpose of career development for young people and adults. A strategy exploring career development's potential to help address broader economic and social issues and connect individuals and industry which would:

- Widen perspectives, ensuring the skills for the future and supporting levelling-up.
- Remove fragmentation within and across the UK and promote an “all-age” approach.
- Engage with sector skills bodies and use the very rich information already available including existing industry careers sites/materials.
- Utilise the tools and training already available through organisations including the Careers Development Institute and the Careers and Enterprise Company.

There is already effective practice in Wales where Careers Wales coordinates opportunities for schools and colleges to engage with employers. Some sector skills bodies also play an important role in coordinating careers information and recruitment for their sectors. Two examples are '[not just lab coats](#)' which [Cogent Skills](#) is involved in and [Tasty Careers](#) set up by the [NSA Food and Drink](#).

Employers/industry

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

Employers will engage with a publicly funded skills system, including apprenticeships, where they can see the benefits for their business, and where it isn't overly onerous to do so. Making access to the system simple is essential to maximise the number and range of employer offering apprenticeships.

This is particularly the case for SMEs. Skills Federation member Enginuity carried out a [survey](#) of 135 manufacturing and engineering micro and SMEs from across the UK which identifies that the UK labour market and skills system is not working for the majority.

Relatedly, policy stability is important. New policy, initiatives and programmes should be given sufficient time to embed before making changes and we would urge Medr to make changes to apprenticeships in Wales which will be appropriate for the long term.

Devolution of skills across the UK, whilst better meeting the skills needs of places, causes challenges for employers, particularly those that work across borders and solving some of the challenges could support more employers in Wales to engage with apprenticeships. Government could helpfully consider how to get parity and greater coordination across the UK within a devolved skills landscape. Agreeing the same competency standards to be used across the UK would be a starting point to achieving this.

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

Taking an employer led approach to defining skills needs and setting standards is necessary to develop and deliver apprenticeships which are sufficiently responsive. Our work indicates that this can be best done with social partners, including employers, in the room from the beginning to design solutions with government. The nature of the ask matters too. Many individual employers are keen to offer support but aren't in a position to synthesise the views of their entire sector, or to provide technical input about skills interventions.

There is, therefore, an important role for intermediaries, including Skills Federation members, to play. Sector skills bodies are better placed and resourced to offer timely perspectives on strategic and operational issues than individual employers. They can offer a view across the sectors they represent and ensure that the needs of smaller employers and supply chains are considered. Our members work across the UK and can help by providing both intelligence and practical support. We would be happy to coordinate an initial workshop with our members to explore how sector skills bodies can strategically support Welsh government to improve the skills system.

As set out in our response to question 5, defining the purpose of apprenticeships and setting out the impact to be achieved, will support evaluation. The views on employers on the impact that apprenticeships make to their business will be a key part of the evidence for any evaluation.

14. 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?

We agree that businesses need to be supported within the apprenticeship system. At the level of principles, it will be important that there is one place where employers can access all the information and support they need, that what is provided is clear, is written in language that employers understand (no jargon), and is appropriate for SMEs as well as larger employers.

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

Place based skills planning can ensure local skills provision is better able to meet the needs of individuals, including connecting them to employers and employment opportunities in their local area.

However, a focus on regions can also pose challenges for employers - particularly those that work across regional and national borders. We have suggested to central government that sector workforce plans at a UK level would help to provide a coherent picture and support coordination of responses to skills challenges. These plans could be implemented at a local level. Sector skills bodies are in prime position to support government in developing these plans.

Learning providers

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

Apprenticeship providers are well-placed to be able to effectively contribute to the design, delivery and evaluation of apprenticeship programmes. Stability of funding is essential for providers who juggle competing priorities and small margins on what they deliver. We support the move to grant funded commissioning model for the new Apprenticeships Programme from August 2027 as this should be a more streamlined process.

There is a small number of apprenticeship providers in Wales which creates opportunities for consultation and to develop networks for practitioners to share effective practice.

17. What is working well and what needs to be strengthened from a provider perspective?

We do not have views to contribute in response to this question

Welsh language

We do not have views to contribute in response to questions 18-20.

Inclusive apprenticeships

We agree that inequality has a negative impact on economic growth and social outcomes and therefore with the central importance of removing barriers to accessing apprenticeships. However other organisations are better placed to provide specific comments about how improve the uptake of apprenticeships from people with protected characteristics in Wales.