

Response to Medr Consultation on the Apprenticeship Programme

October 2025

Universities Wales represents the interests of universities in Wales. Our membership encompasses the Vice Chancellors of all the universities in Wales and the Open University in Wales. Our mission is to support a university education system which transforms lives through the work Welsh universities do with the people and places of Wales and the wider world.

Universities Wales welcomes the opportunity to respond to this consultation. However, we note that we were not included in the pre-consultation stakeholder engagement process. This is deeply unsatisfactory and has left us at a disadvantage in formulating this response, having had less preparation time and a shorter window to seek member input. It is our view that insufficient thought has been given to the apprenticeship eco-system we need in Wales.

Key Messages:

These key messages should be considered integral to our overall response to the consultation. They inform and support our answers to all questions.

Universities are critical to the higher-level skills pipeline in Wales.

- Through degree programmes, degree apprenticeships, professional qualifications and lifelong learning opportunities, our **universities develop high-level skills to meet Wales's economic demands**. As established skills providers they equip students with the knowledge and practical skills needed in the workforce, aligning local demand, priority growth sectors and skills gaps.
- According to the latest [HESA data](#), three quarters of graduates from Welsh universities who are in work in the UK 15 months after graduation are employed in high skilled occupations. A very high percentage -90%- are employed in high or medium skilled occupations. A majority of degrees offered in Wales have a vocational element and/or professional accreditation attached, and universities deliver over 300,000 days of continuing professional development every year¹.
- The future of the Welsh economy depends upon the nation being sufficiently equipped to capitalise on rapid industrial, digital and societal developments. **By 2035, it is predicted that Wales will need 400,000 additional graduates to take on higher skilled employment².**

¹<https://www.hesa.ac.uk/data-and-analysis/business-community/services#cpd>

² [Jobs of the future](#)

Degree apprenticeships are of strategic importance to Wales

- The skills and talent pipeline is essential to support economic growth. This will be a challenge in Wales given the demographics of our workforce, which is on the whole older and less well qualified, and our low levels of HE participation. **Degree Apprenticeships can help deliver the higher-level skills that are lacking in Wales.**
- **Degree apprenticeships are of strategic importance as they support social mobility, lifelong learning and align industry needs.** They strengthen partnerships between higher education institutions and employers to develop high-quality programmes that address skills needs, fill occupations that are experiencing shortages and deliver them in an innovative and flexible way. They provide opportunities for employers to recruit talented staff with potential, and to develop and upskill existing staff.
- **Degree apprenticeships have successfully also widened access to higher education** for cohorts less likely to undertake a traditional degree course and allowed employers to recruit a more diverse workforce. Universities in Wales also have significant expertise in delivering other work-aligned skills-based qualifications that are highly valued by industry such as Foundation Degrees, HNDs and HNCs.

The current system is broken

- Universities currently partner with industry to deliver degree apprenticeships across the available frameworks: advanced manufacturing, engineering, digital and construction.
- **However, the current system is failing.** Fundamentally, this is a programme which operates in the absence of overarching policy. In particular, **it lacks the direction, capacity and investment required to meet the significant demand for high-level skills in the economy.**
- The existing system, which relies on Welsh Government resource for its development, **is not currently agile enough** to respond to the rapid changes in technological skills demanded by Wales' evolving economy. As awarding bodies, there is no reason why Welsh universities could not be given greater freedom to design and deliver apprenticeships in partnership with businesses. For meaningful progress to be achieved, there must be a policy to support innovation, capacity for growth and crucially, a shift to higher-level skills.

Looking ahead

- This consultation represents a useful opportunity to address the challenges within the current system. However, this is a consultation on a programme in the absence of a policy framework, and without a **full independent and transparent review of degree apprenticeships** - within the wider context of work-based learning and skills in Wales – fundamental issues will remain unresolved.
- The Welsh Government must set a clear policy direction for apprenticeships in Wales to ensure that the policy is **sufficiently flexible, agile and capable of expanding in response to emerging high-skill needs of the Welsh economy**.
- In order to implement a viable policy, it is essential that the government enables **full funding flexibility to Medr**. Without such flexibility, the sector will be constrained in its ability to design and deliver provision to meet the key skills needs in the economy, and Medr will fall short of its Strategic Aim of developing Welsh apprenticeship provision that benefits a changing economy and society.
- In terms of the changes proposed in this consultation, **expanding degree apprenticeships beyond the current narrow frameworks** should enable degree apprenticeships to play a more significant role in contributing to growth and social mobility and meeting the future skills needs of Wales - **provided this is funded adequately and does not jeopardise existing delivery**.
- In line with the principle of being ‘agile and responsive’, the programme should give more autonomy to higher education providers to expand their existing successful relationships with industry and to expand development of taught provision for higher level skills. **As awarding bodies, there is no reason why Welsh universities could not be given greater freedom to design and deliver apprenticeships in partnership with businesses**.
- Beyond this, we note the **absence of detailed information** regarding the proposed new apprenticeship mechanism and the revised grant funding model. This significantly limits our ability to fully understand or provide meaningful feedback on these changes. It is essential that this information be published as soon as possible and **that relevant stakeholders are consulted** to ensure transparency and informed input. Further, it is our view that any significant changes in funding for degree apprenticeships is incredibly challenging without changes to the current legislative framework and/or a review of student finance eligibility.

Consultation Questions:

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

While Universities Wales is broadly content with the proposed principles, we disagree that the programme should be limited to level 6 qualifications. Level 7 should be incorporated along with sufficient additional funding. If the programme is to be all-age (principle 1), then it should be able to help develop those who already have qualifications who may be working. Limiting to level 6 qualifications means that those who wish to attain the highest skills are limited to studying through more formal routes which may be less likely to be attractive to somebody in employment, and to their employers.

Universities Wales also has an overarching concern that while the principles are well-meaning, if the budget does not match the ambition, and the system is not set up in sufficiently agile and responsive way (including through funding) then this will not deliver what the Welsh economy needs going forward. If we are to progress the apprenticeships programme in Wales effectively, unresolved issues regarding the underlying policy framework must be addressed.

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?

The programme should give more autonomy to higher education providers to expand their existing successful relationships with industry and to expand development of taught provision for higher level skills. Increased engagement with all forms of higher education is vital for upskilling the nation to meet demand. Universities work closely with professional bodies that link to industries, both for public and private benefit and are used to validating provision that makes courses fit for the future. Trust and appropriate funding opportunities should be established to allow for apprenticeships provision to expand without further layers of red-tape impeding them.

The existing system, which relies on Welsh Government resource for its development, is not currently agile enough to respond to the rapid changes in technological skills demanded by Wales' evolving economy. **As awarding bodies, there is no reason why Welsh universities could not be given greater freedom to design and deliver apprenticeships in partnership with businesses.**

Expanding degree apprenticeships beyond the current frameworks will enable degree apprenticeships to play a more significant role in meeting the future skills needs of Wales - **provided this is funded adequately and does not jeopardise existing delivery.** There is appetite from students, universities and professional bodies to expand into areas like health and social care, teacher training, professional services and management, and childhood and youth studies.

As part of a wider review, there should be consideration given to **improving pathways to higher-level skills.** These pathways should be flexible and allow learners to transition

between routes allowing learners to build their way through the Wales qualification framework through to levels 6 or 7.

The current disconnect between the variety of opportunities that are available means many apprentices, who have the sufficient skills, aptitude and appetite to progress, are simply unable to move forward with their applied learning. This is surely a significant missed opportunity not just for them personally, but for their employers and for the economy more broadly.

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?

As noted in our key messages above, this is a consultation on a programme in the absence of a policy framework, and without a **full independent and transparent review of degree apprenticeships** - within the wider context of work-based learning and skills in Wales – fundamental issues will remain unresolved.

The Welsh Government must set a clear policy direction for apprenticeships in Wales to ensure that the policy is **sufficiently flexible, agile and capable of expanding in response to emerging high-skill needs of the Welsh economy**.

In order to implement a viable policy, it is essential that the government enables **full funding flexibility to Medr**. Without such flexibility, the sector will be constrained in its ability to design and deliver provision to meet the key skills needs in the economy, and Medr will fall short of its Strategic Aim of developing Welsh apprenticeship provision that benefits a changing economy and society.

As mentioned above, the programme should give more autonomy to higher education providers to expand their existing successful relationships with industry and to expand development of taught provision for higher level skills. **As awarding bodies, there is no reason why Welsh universities could not be given greater freedom to design and deliver apprenticeships in partnership with businesses.**

Expanding degree apprenticeships beyond the current narrow frameworks should enable degree apprenticeships to play a more significant role in contributing to growth and social mobility and meeting the future skills needs of Wales - **provided this is funded adequately and does not jeopardise existing delivery**.

Beyond this, more flexibility is needed so that **small and medium enterprises** are able to make use of funding and develop their workforces. The changes should take careful consideration of where funding should flow to create maximum impact on areas that demonstrate a skills-shortage at the moment and particularly for those that are likely to be ongoing and will underpin a successful economy. For example, social care and teaching are areas that are unlikely to improve significantly without thoughtfully planned interventions, but other areas may prove to be more time limited.

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

It will be very difficult to demonstrate success in just five years as learners will not have had time to progress through all of the levels in that timeframe. Limiting the window to five years demonstrates short-sightedness. Not enough consideration has been given to how learners will flow through from levels 2 to 6 (or 7). This underlines the need for the programme to be properly considered in policy terms and the need for a full review of how WBL/skills will underpin the Welsh economy going forward.

Success in seven years' time may be demonstrated by a solid flow of learners completing degree apprenticeships across a range of subject areas and recruited from a range of routes. Particular consideration should also be given to the impact on students who are subject to multiple points of deprivation, how they come through the system and graduate with honours.

However, without a full independent and transparent review of degree apprenticeships within the wider context of work-based learning and skills in Wales, to ensure that the policy is sufficiently flexible, agile and capable of expanding in response to emerging needs of the Welsh economy, success in five or even seven years will be inherently limited.

The Welsh Government must set a clear policy direction for apprenticeships and the wider skills policy in Wales. And in order to implement a viable policy, it is essential that the government enables full funding flexibility to Medr. Without such flexibility, the sector will be constrained in its ability to design and deliver provision to meet the key skills needs in the economy, and Medr will fall short of its Strategic Aim of developing Welsh apprenticeship provision that benefit a changing economy and society.

In summary the following factors will be important:

- A major improvement in gender balance through the apprenticeship programme
- Improved EDI outcomes
- Improved completion rates
- Flexibility

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

Universities Wales has not been involved in the consultation that led to this proposed definition of an apprenticeship. The definition appears suitable in the context of the current programme but might prove restrictive in view of possible future arrangements. We do believe that it could be further enhanced by including reference to how these arrangements are a joint enterprise between employers, education providers and students.

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

As noted above, Universities Wales would be supportive of an independent review that would help establish more fully what the economy in Wales will need going forward. It should be noted at this point that Universities Wales has not been included in prior discussions regarding sectors and therefore does not reflect current sector demand for degree apprenticeships.

That said, expanding degree apprenticeships beyond the current narrow frameworks should enable degree apprenticeships to play a more significant role in contributing to growth and social mobility and meeting the future skills needs of Wales - **provided this is funded adequately and does not jeopardise existing delivery.**

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

As noted above, Universities Wales would be supportive of an independent review that would help establish more fully what the economy in Wales will need going forward.

Universities Wales has repeatedly called for expansion of the frameworks and note that the bulk of the subject areas have been addressed. However, without additional funding for degree apprenticeships, it is difficult to see how genuine expansion takes place.

Beyond this, consideration might still be given to a teaching apprenticeship route given the recruitment challenges in that particular sector.

Given the curtailed period of consultation for higher education to engage with this proposal, Universities Wales expects that there will be further time to reflect upon occupational demand.

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

As expressed previously, allowing universities greater freedom to design and deliver apprenticeships in partnership with businesses would enable more agility to respond to emerging skills requirements.

As part of an independent review, consideration should be given to how Welsh Government takes consideration of how and what elements of the workforce will need to be expanded as a result of mid to long-term economic planning. This would mean engaging with all levels of tertiary education as a pre-cursor to planned development to ensure that delivering the appropriate workforce is achievable.

Longer-term planning should also include funding that goes beyond an annualised funding settlement and ensure there is enough flexibility to meet the needs of a changing economy.

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?

Learners should be able to understand that an apprenticeship route can lead them to attain the highest possible skills and have a road-map available to them from the outset that does not lead to any siloed qualifications. An apprentice hairdresser for example should be able to understand that while their skills journey starts with styling, they may be able to proceed to business management qualifications and become a successful entrepreneur themselves. There should also be a baked-in ethos of flexibility for those who wish to drift between apprenticeships and classroom-based qualifications at different levels.

For example, there is a large pool of Learning Support Assistants that would benefit from being able to access teacher training via an apprenticeship route. This would allow them to earn and learn, while still fulfilling their primary function and eventually increasing the pool of trained teachers – and particularly ones who are likely to remain in the local workforce. For many of these, already balancing family needs and a full-time job, accessing higher education in addition to their work can be challenging.

Ideally, when a student enrolls on their first apprenticeship, a career pathway should be available to them through stackable qualifications that can be gained through a range of apprenticeships at different levels, up to level 6 or 7.

Universities Wales understands that the need for vertical integration across all levels, and ideally up to level 7, is something that Medr is in the process of evaluating. Medr will need to ensure that universities are properly included in further discussions as demand can come from the top-down, not just bottom-up.

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

The needs of the economy should be taken into account so that Wales does not run the risk of having an attractive route becoming massively over-subscribed and the market flooded in a particular skillset. One particular outcome that should be considered is that a learner should never be led into a silo that stops at a particular level and impedes them understanding that their learner journey can take them all the way to the highest level of skills. A key outcome that should be prioritised are ‘completions’ rather than ‘starts’, and where insufficient completions are occurring, these should be reviewed.

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

Flexibility between accessing different routes at different points of their learner journey would help with attracting a wider cohort of apprentices. If the scheme is to truly be ‘all-age’ then it should be aimed at all ages, ensuring that older less qualified people also have the opportunity to gain higher level skills. Targeted support for under-represented

groups should be considered in order to help tackle long-term and often multi-generational gaps in some communities in Wales. Consideration should also be given to addressing ‘cold-spots’ in Wales where apprenticeship opportunities have historically been less available due to the propensity for smaller employers. The impact of such projects should be clearly showcased and the benefits for employers and learners should be readily apparent.

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

Consideration should be given to the funding mechanisms and incentives that can be created to encourage SMEs to overcome the current barriers they face. A recent report by the [Edge Foundation](#) notes that there were issues with engagement with SMEs in England as there is little immediate return on investment for resource-poor businesses. SMEs should be encouraged to engage with schools from a young age, starting before learners enter the tertiary sector. Consideration should be given to flexible and part time apprenticeships which may be more suitable for smaller employers, ensuring there is appropriate credit recognition which allows learners to stack credits and gain certification.

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

As awarding bodies, universities should work directly with employers on the construction and delivery of degree apprenticeships, as previously noted this would allow universities and employers to work in real time in responding to the needs of the Welsh economy. Our members already leverage strong links with employers, not only in the design of apprenticeships, but also in more traditional routes. As well as employers, consideration should be given to engagement with professional bodies who will be taking a longer-term view in some instances of what will be needed in the future. Given the long-standing relationships between employers and universities, it would be helpful for the funding mechanism to be appropriately flexible to allow both businesses and universities the opportunity to plan for the longer term rather than yearly allocations which historically have impeded progress.

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?

Employers need to have a clear idea and understanding as to how they can engage with apprenticeships. A model should be developed that is not burdensome and demonstrates clearly the benefits of engaging. A multi-year funding model, or indeed in the case of degree apprenticeships more freedom to work with awarding bodies on developing these courses would allow businesses to plan better. The late notification of degree apprenticeship funding to date has proved to be a serious issue for universities and their partners in developing and recruiting to programmes.

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

It should be noted that governments across the UK have struggled with effective skills planning for many decades. If Medr is to effectively grasp this nettle, then it is going to need to be given sufficient scope by Welsh Government to determine strategy and associated funding that allows providers to deliver in a flexible and agile manner. This is particularly important given the Welsh economies dependence on SMEs.

All relevant government departments, such as economy, education, local government and health, need to ensure a coordinated cross-sector approach and develop a degree apprenticeships policy that supports regional economic development and public sector workforce development and training.

Regional Skills Partnerships have a relevant role to play in liaising with Medr on skills gaps and demand from industry, which sits alongside Welsh Government steers on sectors in which the skills pipeline should be developed as a priority for the Welsh economy.

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

Meaningful consultation with the higher education sector is of vital importance to the success of apprenticeships in Wales. **This has evidently been lacking thus far.**

Universities Wales would support a full independent review of this area, conducted transparently and consultatively, which would take into account the views of providers at all levels, so that higher level skills are properly considered. Increased engagement with all forms of higher education is vital to develop a policy that is fit for purpose.

As awarding bodies, universities should work directly with employers on the construction and delivery of degree apprenticeships, as previously noted this would allow universities and employers to work in real time in responding to the needs of the Welsh economy.

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

We understand that the current funding method is not working well for Degree Apprenticeships. Funding must be confirmed well in advance so that employers and providers can construct a stable platform with which learners can engage.

However, looking ahead, we note the absence of detailed information regarding the proposed new apprenticeship mechanism and the revised grant funding model. This significantly limits our ability to fully understand or provide meaningful feedback on these changes. It is essential that this information be published as soon as possible and that relevant stakeholders are consulted to ensure it works for providers.

Providers have also noted that they would benefit from improved guidance from Medr on tripartite student learning agreements relevant to degree apprenticeship provision, and

data protection expectations/safeguards with reference to the relationship between providers and employers.

Universities also suggested that consideration should be given to how recognised prior learning (RPL) can fit into the skills agenda.

18. 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? • 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?

We welcome the commitment to increase apprenticeship opportunities through the medium of Welsh. There is a need for clear and accessible routes to apprenticeships in Welsh. To do this, the framework needs to

- i. Recognise the Welsh language as a strategic workforce skill by incorporating it into the frameworks, giving appropriate consideration by sector to how that is inserted and implemented.
- ii. When funding providers, Medr should recognise the higher costs of Welsh language provision, and allocate an appropriate resource.
- iii. Plan the apprenticeship workforce strategically, including through supporting assessors to develop skills to assess in Welsh.

19. 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

The Welsh language should be mainstreamed and deeply embedded in all documentation, rather than treated as an addition.

As mentioned above, when funding providers, Medr should recognise the higher costs of Welsh language provision, and allocate an appropriate resource.

20. 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

Prospective apprentices should receive timely and clear information about their right to study through the medium of Welsh. The first point of contact is crucial in terms of normalising the use of the Welsh language between the apprentice, provider and employer.

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

Further research needs to be undertaken to understand some of the barriers currently preventing underrepresented groups in accessing and succeeding in apprenticeships. The Welsh Government must set a clear policy direction for apprenticeships, and should invest in initiatives to support social mobility, lifelong learning and growth in degree apprenticeships among underrepresented groups. The research should also take account of social/financial barriers faced by learners and employers and consider how they might be overcome, as well as taking consideration of participation cold-spots. The application system for degree apprenticeships must be as straightforward as possible and as clear and streamlined as that for traditional degree programmes.

22. What targeted recruitment strategies can support participation from underrepresented groups?

There is a significant lack of understanding and awareness surrounding degree apprenticeships among both employers, employees, schools, and the public. Universities already do much in the way of outreach in schools and communities, but the limited frameworks available has made it difficult to develop a more general understanding in learning communities.

We have a level of nervousness based on past experience of recruitment strategies sponsored by public bodies which may push learners from certain backgrounds down pre-determined routes rather than apprenticeships just being part of a range of options for further study.

Targeted efforts are also required to raise awareness among SME's and tailored incentives to encourage greater participation in degree apprenticeships.

23. 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?

Please see our response to Q22 (above) and responses to other questions in relation to the Welsh language and employer cold-spots.

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

This scheme currently only exists for apprenticeships in the 16-19 range. The reasoning for this is unclear. Universities Wales would be in favour of continuing to fund this scheme with the caveat that it should be expanded to all-ages and has no negative impact on current funding for higher education.

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

Please note our responses to other questions including allowing universities to work directly with employers and proposals regarding more flexible arrangements with SMEs.

26. What could we do to support participation in apprenticeships for those who are underrepresented?

Degree apprenticeships can successfully widen access to higher education for cohorts less likely to undertake a traditional degree course and have allowed employers to recruit a more diverse workforce.

Universities Wales notes that UCAS recently referenced a correlation between 18 year-olds who wish to investigate degree apprenticeships and those subject to multiple factors of deprivation, particularly when segregated by geography. These areas are those which tend not to have large industries and are more likely to have a range of SMEs. These areas also tend to have localised transport issues and a pattern of intergenerational underachievement when it comes to qualifications.

As previously noted, Universities Wales has called for a full and independent review of the apprenticeship system in Wales. As part of this work, the barriers to access should also be considered and targeted interventions identified.