

## Consultation questions

No.	Question	Response
<b>What is the New Apprenticeship Programme trying to achieve</b>		
1	Are these high level principles right for the new apprenticeship programme in Wales?	<p>Yes.</p> <p>The Welsh Language Commissioner agrees with the high level principles and supports the principle to 'increase apprenticeship opportunities available in Welsh'. We believe that principle should be expanded to develop the Welsh language skills of each apprentice in the context of their vocational field. This should include increasing language awareness where relevant (e.g. the importance of using a few Welsh words when providing care). We will discuss this in more detail below.</p> <p>Public sector employers are already required to offer and provide training and language awareness opportunities under the Welsh language standards. Doing this earlier on an individual's learning and career path would be advantageous.</p>
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?	<p>From the point of view of Welsh language provision, there are several considerations for creating a flexible programme that meets the needs of learners and employers. These include priority areas in terms of providing Welsh language services, for example the health and care sector and the childcare sector, and communities with a higher density of Welsh speakers.</p> <p>The Welsh language should be included as one important element in the recruitment process, ensuring that information about language skills is gathered early and is used to inform linguistic support.</p>
3	What innovations or changes would you like to see in the future apprenticeship programme to ensure it remains relevant, inclusive, and	We would like to see the Welsh language as an easy and accessible choice for all learners, with Welsh-medium provision and Welsh language skills training proactively offered to potential

No.	Question	Response
	impactful for the next generation of learners in Wales?	<p>apprentices. This should include developing each apprentice's awareness of the importance of the Welsh language.</p> <p>The proposed apprenticeship programme therefore needs to be made for Wales, reflecting the specific needs of Wales.</p>
4	What would success look like in five years' time?	<p>According to the Welsh Government's <a href="#">statistics</a> on work-based learning, there has been a substantial increase in learning activities that include a 'small amount of Welsh-medium learning'. However, a very low proportion is through the medium of Welsh only. Success in five years' time would mean an increase in the following:</p> <ul style="list-style-type: none"> <li>• the number of Welsh-medium and bilingual apprenticeships</li> <li>• the amount of Welsh-medium training across the entire provision</li> <li>• the number and percentage of learners who receive Welsh-medium and bilingual training</li> <li>• the number and percentage of learners who develop their Welsh language skills, if they are not yet able to follow training through the medium of the language</li> <li>• the learners' understanding of the benefits of Welsh language skills for the workplace and their career</li> <li>• the number and percentage of the workforce who teach and/or assess through the medium of Welsh</li> <li>• the number of Welsh-medium vocational qualifications</li> </ul> <p>More generally we would like to see all apprentices improve their Welsh language skills during their apprenticeship (see our response to question 10 for more detail).</p>
5	Does the definition of a Welsh apprenticeship set out what the new Programme needs to deliver?	
<b>Apprenticeship Sector Frameworks</b>		

No.	Question	Response
6	Are these sectors right to meet the needs of the economy and learners?	
7	Are there any broad occupational sectors that you would expect to see that are not included?	
8	How should sector frameworks evolve to reflect emerging industries, skills needs, and regional priorities within Wales, what is the evidence base for this?	<p>The Regional Skills Partnerships have an important role in the context of understanding skills needs and planning provision on that basis. Following a report in 2019 by the Economy, Infrastructure and Skills Committee on the <a href="#">Regional Skills Partnerships</a>, the <a href="#">Welsh Government</a> agreed that the ability of the Partnerships to collect and analyse data on the Welsh language must be substantially improved. The North Wales Regional Skills Partnership has mapped apprenticeship routes and the Welsh-medium/bilingual provision in its area. All the Partnerships should be supported to provide complete information about the provision of Welsh-medium apprenticeships throughout Wales and make the most of their contacts with employers to identify their needs. This would be a basis for planning the provision deliberately and efficiently and supporting apprentices with Welsh language skills.</p> <p>The <a href="#">Commission for Welsh-speaking Communities</a> has called on local authorities, health boards and other large public sector organizations to plan more deliberately in order to offer more Welsh-medium apprenticeships. In the Commission's opinion, this would create favourable conditions to enable young people to stay in their communities in areas of higher density linguistic significance.</p>
<b>Learners</b>		
9	What aspects of the current learner journey in apprenticeships work well, and where do you see opportunities	Three organizations making a key contribution to the field of Welsh-medium apprenticeships are the Coleg Cymraeg Cenedlaethol, Urdd Gobaith Cymru and

No.	Question	Response
	for improvement to better support learners throughout their learning?	<p>the National Centre for Learning Welsh. Their work includes training apprentices in a number of different sectors, working in partnership with employers and education and training institutions, and providing Welsh language courses and specialist resources.</p> <p>Since 2019 the Coleg Cymraeg Cenedlaethol has been implementing the <a href="#">Further Education and Apprenticeship Welsh-medium action plan</a>. The plan sets out actions over the short, medium and long term in relation to six key strategic areas, including increasing staffing capacity, improving provision and expanding resources.</p> <p>Medr has a crucial role in contributing to keeping up the momentum that these three organizations have established. We welcome Medr's intention to collaborate with partners and we would be glad to discuss our work further. The workplace is a priority in the Commissioner's <a href="#">Strategic Plan</a> for 2025-30. An essential element of developing the Welsh language in the workplace is Welsh-medium apprenticeships. The challenge, in our opinion, is to maintain young people's Welsh language skills and turn speakers into long-term users. It is necessary to ensure that the Welsh language is an important element in all apprenticeships.</p> <p>The Commissioner has an important role in planning Welsh language use and responding to language needs within specific workplaces and sectors. We proactively support organizations to increase the use of the Welsh language in the workplace. Our work includes holding a virtual forum and events to discuss the Welsh language in the workplace and share good practice. These steps have received a positive response from organizations throughout Wales.</p>
10	What outcomes should be prioritised for apprentices (e.g. sustainable	The Welsh language skills of prospective apprentices could give them an advantage

No.	Question	Response
	employment, qualifications), and how can these be effectively measured and supported?	<p>when applying for specific apprenticeships. All apprentices should also have an opportunity to develop their Welsh language skills during their apprenticeship. The <i>Cymraeg 2050</i> strategy states that ‘young people will need to be aware of the benefits of continuing to develop their Welsh language skills in preparation for the workplace and the importance of using the language regularly to maintain fluency and confidence’. All apprentices should be given this opportunity and encouraged to take advantage of it. Their language skills should be recorded at the start of their apprenticeship and again at the end in order to measure progress using the Code to describe Welsh language ability, which the Welsh Ministers will develop following the Welsh Language and Education (Wales) Act 2025. It should be ensured that support is available for all apprentices, whether they do their course in Welsh or partly or not, to improve their Welsh language skills during their apprenticeship. The <a href="#">language pyramid</a> model of the Coleg Cymraeg Cenedlaethol is also very relevant in this context.</p> <p>There is also a need to prioritize Welsh-medium and bilingual vocational qualifications. The lack of Welsh-medium qualifications is a problem and it means that Welsh-medium learners do not have the same range of choice of qualifications as their peers in the English-medium sector. Qualifications Wales has a strategy to increase the availability of Welsh-medium qualifications. This includes targeting post-16 vocational qualifications according to strategic priority areas, consulting with the Coleg Cymraeg Cenedlaethol and collaborating proactively with awarding bodies. Qualifications Wales reported that it had succeeded in going beyond its initial target of 120 qualifications to be prioritized for provision in Welsh between 2023 and 2025.</p>

No.	Question	Response
		<p>Although important work has been done in terms of expanding Welsh-medium and bilingual vocational qualifications, there is still considerable work to be done in this context. The method of expanding qualifications at present depends to a large extent on a model of understanding the 'current demand'. The result of this is often that substantial obstacles continue to be faced by learners who wish to study through the medium of Welsh. For example, within one syllabus it is possible that the level 2 qualification is available, but not the level 3 qualification. This model does not really encourage learners to choose qualifications through the medium of Welsh or bilingually.</p> <p>In relation to the development of Welsh-medium and bilingual qualifications, we believe that awarding bodies need to be more flexible in terms of learners' choices. For example, when registering for a qualification that is currently available in both languages, they need to choose a language and that will be the choice for each element of the qualification. It would be advantageous to have more flexibility in order to meet the needs of the learner.</p>
11	How can we attract more, and/or a wider cohort of apprentices, regardless of background or starting point into the programme?	
<b>Employers/industry</b>		
12	How can we widen the number and range of employers offering apprenticeships, especially SMEs?	
13	How can employers be more effectively engaged in the design, delivery, and evaluation of the apprenticeship programme to ensure relevance and impact?	<p>We believe that employers have an important role to play in terms of creating demand for apprentices with Welsh language skills and encouraging learners to value and develop those skills. Consideration should be given to how to support employers to highlight the need for a workforce with Welsh language skills.</p>

No.	Question	Response
		This was supported by the Welsh Government's <a href="#">policy statement</a> on apprenticeships in 2024. Apprenticeship providers and employers should work together, as well as with schools, to ensure that there is a clear pathway from statutory education to the workplace that maximizes learners' Welsh language skills.
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?	A large number of employers are subject to the Welsh language standards or have received the Welsh Offer recognition from the Commissioner. They should be supported to employ apprentices with Welsh language skills and assist the apprentices to use and develop those skills in the workplace. Other employers should also be encouraged to act in the same way. Employers can be referred to the Commissioner for support and information about the benefits of using the Welsh language in the workplace and when offering a service to the public. They should also be directed to the National Centre for Learning Welsh, which offers free provision for apprentices aged 16-25 who wish to develop their Welsh language skills.
15	How can we ensure a programme that supports regional economic development and place based skills planning?	<p>Apprenticeships create a key link between education institutions, Welsh speakers and the companies and sectors that are looking for employees with bilingual skills. Through this link, it is possible to meet the needs of Welsh speakers and their communities in a highly effective way. Apprenticeships can place Welsh speakers exactly where they are needed and thereby contribute directly to the realization of some of the objectives of the <i>Cymraeg 2050</i> strategy. These include increasing the use of the Welsh language in the workplace across all sectors. Strategic planning is necessary to achieve this.</p> <p>As part of this it is necessary to ensure that regional economic frameworks consider in more detail what the needs of</p>



No.	Question	Response
		<p>the Welsh language are within specific workforces and sectors.</p> <p>(See also our response to question 8 above.)</p>
<b>Learning providers</b>		
16	How can providers be more effectively engaged in the design, delivery, and evaluation of apprenticeship programmes to ensure relevance and impact?	(See also our response to question 15 above.)
17	What is working well and what needs to be strengthened from a provider perspective?	
<b>Welsh language</b>		
18	<p>Do our high level principles for the new Apprenticeship programme have any positive or negative effect on:</p> <p>(a) opportunities to use the Welsh language, and</p> <p>(b) treating the Welsh language no less favourably than the English language</p> <p>in particular;</p> <ul style="list-style-type: none"> <li>How can we encourage a higher take up of Welsh medium provision and bilingual workplace opportunities across Wales?</li> <li>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?</li> </ul>	<p>It does not appear that the consultation document specifically considers the impact of the proposed programme on the Welsh language. While accepting that Medr is not yet under the Welsh language standards, it should be noted that there is an expectation on organizations that come under the Welsh language standards to give conscientious consideration to the possible effects of any policy decision regarding the Welsh language, and when consulting to seek an opinion on those effects. Further information and advice on this can be found on the <a href="#">Welsh Language Commissioner's website</a>.</p> <p><i>Cymraeg 2050</i> emphasizes the importance of post-compulsory education and training providers in maintaining learners' Welsh language skills in order to meet the growing demand for a bilingual workforce. By now, there are over 130 organizations throughout Wales under the Welsh language standards regime, including some of the largest employers in Wales. The standards regime has led to a substantial increase in the demand for individuals who can work bilingually. We also know that the Welsh language is a skill valued by many organizations beyond</p>



No.	Question	Response
		<p>the standards regime. These include small and large businesses, some of which have received the Welsh Offer recognition from the Commissioner. There is huge potential for expanding Welsh-medium and bilingual apprenticeships, especially given that the numbers doing Welsh-medium apprenticeships remain very low at present.</p> <p>As stated in our response to question 4 above, it is crucial that learners understand the benefits of Welsh language skills for the workplace and their career. Following on from that, it must be ensured that sufficient opportunities are available to them to improve their Welsh language skills and maintain them, to receive vocational training through the medium of Welsh and to be assessed through the medium of Welsh. It is also necessary to emphasize that the Welsh language is relevant to all apprentices, regardless of the language medium of the apprenticeship itself.</p>
19	<p>Are there any considerations for us to take into account that would have a positive impact on:</p> <ul style="list-style-type: none"> <li>(a) opportunities to use the Welsh language, and</li> <li>(b) treating the Welsh language no less favourably than the English language</li> </ul>	<p>As stated in our response to question 3 above, it should be ensured that the Welsh language is an easy and accessible choice and that all providers are proactive in offering Welsh-medium provision and Welsh language skills training to potential apprentices.</p>
20	<p>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:</p> <ul style="list-style-type: none"> <li>(a) opportunities to use the Welsh language, and</li> <li>(b) treating the Welsh language no less favourably than the English language</li> </ul>	
<b>Inclusive apprenticeships</b>		

**Medr/2025/17: Annex A**

No.	Question	Response
21	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?	
22	What targeted recruitment strategies can support participation from under-represented groups?	
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?	
24	Should we continue to fund the supported apprenticeship programme and the Employer Incentive Scheme? Please explain your answer.	
25	Are there other options in addition/instead that would help support inclusive apprenticeships more?	
26	What could we do to support participation in apprenticeships for those who are under-represented?	