



Response from the National Training Federation Wales (NTFW) to Medr's Consultation on a new regulatory system including conditions of registration and funding

We support the ambition and structure of the proposed regulatory system. However, the framework must better reflect the distinct nature of apprenticeship provision, which differs significantly from HE/FE models. Without this, the approach risks being misaligned and burdensome.

The approach mirrors HE/FE protocols and does not fully account for the employer-led, workplace-based nature of apprenticeships. To apply it consistently, Medr must develop sector-specific indicators and compliance pathways for apprenticeship providers.

Conditions appear to assume academic delivery models. Apprenticeship providers need tailored guidance that reflects their operational realities, including employer involvement and dual accountability.

Medr must ensure the framework does not duplicate existing Estyn or contract-holder requirements. The cost of compliance — especially for smaller providers — must be acknowledged and supported through funding.

The interventions align in principle, but clarity is needed on how enforcement will be applied equitably across provider types.

- Validation Arrangements
- Information Provided to Prospective Students
- Notification of Changes
- Welsh Language
- Complaints Process
- Equality of Opportunity
- Information, Assistance and Access

Medr must ensure engagement models reflect the realities of apprenticeship delivery. Monitoring should be proportionate and avoid duplicating existing reporting mechanisms.

The Quality Framework must reflect apprenticeship-specific outcomes and employer roles. Current drafting risks applying academic metrics to work-based learning.

The employer's role in delivering IAG must be acknowledged. Medr staff's lack of clarity on "employed status" raises concerns about sector understanding.

Conditions must be adapted to reflect the dual role of providers and employers in apprenticeships. Without this, compliance risks being impractical or symbolic.

Quality must include workplace outcomes, employer feedback, and learner progression in employment — not just academic achievement.

- Learner voice mechanisms
- Continuous improvement focus
- Employer engagement in quality assurance

Approaches that include employer feedback and workplace performance metrics add the most value for apprenticeships.

Current data sets are HE/FE-centric. Apprenticeship-specific data — such as employer satisfaction, completion rates, and job outcomes — must be included.

Medr must clarify how interventions will be applied equitably and proportionately, especially for smaller providers.

- Lack of apprenticeship-specific indicators
- No recognition of employer role
- No cost impact analysis for compliance

Elements to Strengthen

- Sector-specific guidance
- Implementation support
- Clarity on enforcement powers

Medr must build internal expertise in apprenticeship delivery. Questions raised by staff about “employed status” suggest a need for training and sector engagement.

Guidance must include SASW, Estyn protocols, and apprenticeship contract-holder requirements.

Medr should ensure Welsh-medium provision is supported in workplace settings and that employers are equipped to deliver bilingual support.

The framework promotes learner well-being but must also consider employer engagement and staff development to fully meet national goals.

The proposals acknowledge EDI principles but must reflect the unique challenges of workplace-based learning, including employer responsibilities and socio-economic barriers.