

Consultation questions

No.	Question	Response
1	Are there any unintended consequences of this model compared to the current model?	Yes / No Please provide comments to support your response, including any examples of potential unintended consequences: Yes There is a significant risk that the proposed model becomes overly complex to profile, manage and forecast. Many of the elements being reintroduced existed in earlier systems and created substantial operational challenges. The number of variables influencing learner funding previously made accurate profiling extremely difficult, and without clearer modelling parameters, the new approach risks replicating these issues. The consultation aims to improve transparency, yet the explanation of how unit values, weightings and the Medr unit have been calculated does not demonstrate increased transparency. Current cost-survey methods, while bureaucratic, provide a clear link between delivery costs and funding values. This clarity is not present in the proposed model. The model may also make demand forecasting more difficult, reducing providers' ability to plan capacity and engage employers effectively. Finally, the heavy weighting of funding towards end-point outcomes risks undermining viability, particularly for longer programmes and for learners requiring additional support.

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2	In the new funding model we intend to validate qualification data from the information contained in the new framework library at the start of the programme instead of during the learning. Are there any impacts for learning providers in regards to time and cost implications?	Yes / No Please provide comments to support your response, including any examples of potential impacts for learning providers in regards to time and cost implications: Unable to respond fully The consultation does not explain how the validation process will operate, making it impossible to assess time or cost implications. Key areas requiring clarification include: • how validation will be triggered • what data providers must submit • whether the process will be automated • how errors will be resolved There is currently no Welsh-specific learner management system, meaning providers may need multiple diagnostic tools, increasing cost and workload. Integration with LLWR and implications for ACW certification are unclear. The model is also likely to increase administrative burden in reconciliation, forecasting, and quality assurance. Until Medr provides detailed operational guidance, providers cannot meaningfully assess the impact.
How are we going to determine the framework value?		
3	We propose to increase the Assessment and Induction payment from £285 to £400. Is £400 payment a fair reflection of the additional assessment and induction requirements?	Yes / No Please provide comments to support your response Unable to respond fully

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		The term <i>assessment</i> is ambiguous. If it refers to programme-specific initial assessment (IA) designed solely to calculate RPL, this would require: • extensive curriculum design • staff training and standardisation • increased quality assurance • ongoing maintenance This goes far beyond typical RPL processes. Wales also lacks a national learner platform, meaning providers would need multiple diagnostic tools. Clear, consistent rules on IA and induction are essential, as current practice varies significantly across the sector.
4	To what extent do you agree with the delivery cost ranking for the sector frameworks? (please see Annex C for proposed Sector Framework rankings).	Strongly agree / Agree / Disagree / Strongly disagree Please provide comments to support your response Disagree The proposed weightings appear aligned with tertiary education norms but do not reflect apprenticeship delivery realities. Sectors such as Health & Social Care and Catering & Hospitality among the most resource-intensive are ranked too low. These sectors involve: • high proportions of single-learner employers • extensive travel • irregular working patterns • high pastoral and safeguarding needs

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		• frequent workplace changes • significant regulatory requirements Without transparency on how weightings were determined, providers cannot assess their fairness. A robust model requires clear cost assumptions, apprenticeship-specific evidence, and provider engagement
How are we going to fund learning providers?		
5	The duration period will be set on an individual apprentice basis to enable flexibility within the system. Are there any impacts or unintended consequences of this flexibility?	Yes / No Please provide comments to support your response: Yes Flexibility is welcome, but it introduces complexity in: • contract profiling • financial forecasting • subcontracting oversight There is also a risk of unintended behaviours, such as shortening durations to draw down funding more quickly. Clear rules and monitoring are essential to ensure planned end dates reflect learner need, not financial pressure.
6	It is proposed the new funding model will move to an outcome payment of 20%, increasing focus on successful completion. What are the key benefits moving to an outcome model?	Disagree Increasing the outcome weighting to 20% risks: • selective recruitment of only high-achieving learners • early withdrawal of learners whose progress may affect outcomes

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		reduced access for those needing additional support Wales already has the highest attainment rates in the UK. Historically, a 15% outcome payment created strain without improving achievement. Attainment should be driven by quality assurance, not financial incentives.
7	Is 20% outcome payment an appropriate percentage value?	Yes/No If not, why not? No There is no clear rationale for the proposed weighting. It is unclear whether “outcome” refers solely to qualification achievement or broader learner impact. A 20% weighting does not reflect actual delivery costs and would create cashflow challenges, particularly for longer programmes. Previous high outcome weightings caused instability and should not be repeated.
Additional costs		
8	Are there any further additional costs you wish us to consider?	Yes / No Please provide comments to support your response No While the proposed categories are reasonable, the consultation lacks detail on evidence requirements, reconciliation, and audit expectations. There are inconsistencies between

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		work-based and college-based ALN support. Further targeted consultation is needed. No additional uplifts are requested, but the purpose of uplifts must be clearly defined.
9	We do not propose any additional funding where learners have to resit qualifications. Are there any unintended consequences of this approach?	Yes. A fixed funding allocation makes it difficult to absorb resit costs. Registration and certification fees have risen by up to 20% in two years. Some qualifications require re-registration if the registration period expires before programme completion. It is unclear whether resit funding would cover these costs.
10	What do you think would be the likely positive or negative effects of our proposals on the Welsh language? We are particularly interested in any potential effects on opportunities to use Welsh and on not treating Welsh less favourably than English.	Independent providers have invested heavily in Welsh-medium provision, but impact is limited because usage depends largely on employer culture. System issues such as progress resetting when language codes change also hinder accurate tracking of Welsh-medium progression
11	Are there any other considerations for us to take into account, that would have a positive or an increased positive effect on: opportunities to use the Welsh language, and treating the Welsh language no less favourably than the English language.	Employer incentives are being explored but have not been tested. Pilot activity and evaluation are needed to determine whether incentives genuinely increase Welsh-medium uptake
12	Are there any other considerations for us to take into account, so that our proposals would not have adverse	A sector-wide review is needed. Limited engagement from awarding bodies restricts Welsh-medium

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	effects, or would reduce adverse effects on: opportunities to use the Welsh language, and treating the Welsh language no less favourably than the English language.	qualification availability. English reforms risk widening the gap further. A national strategy for awarding body engagement is essential.
13	Will the proposals contribute to the achievement of the national well-being goals set out in the Well-being of Future Generations Act 2015?	Yes Partially No Please provide details: Partially A strong focus on attainment risks reducing opportunities for learners with barriers to achievement. Around 30% of apprentices start below required maths/English levels but succeed with support. Wider apprenticeship outcomes employment, earnings, confidence must be recognised, not just qualification achievement.
14	Will the proposals contribute towards: Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010? Advance equality of opportunity between persons who share a protected characteristic and persons who do not share it? Foster good relations between persons who share a protected characteristic and persons who do not share it?	Yes Partially No Partially Apprenticeship providers deliver extensive safeguarding and pastoral support but do not receive equivalent funding to other tertiary providers. A unified tertiary system requires parity of funding for learner support. Without this, inequalities will persist.

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	Reduce the inequalities of outcome which result from socio-economic disadvantage?	
15	Is there any additional information you would like to feed into the consultation?	Dual-running of systems Clarity is urgently needed on whether the current model will run alongside the new one. Under NPFS, dual-running created: • two sets of rules • two payment profiles • administrative burden • unintended learner disadvantage Providers need guidance on funding rules, reconciliation, transition timelines and protections. System capability LLWR previously struggled with complexity. If the new model introduces greater flexibility, system capability must be assured. Recognition of prior attainment Clear policies are needed on how reductions will be applied and audited. Programme-level flexibility Changing planned end dates shifts payment profiles, affecting forecasting and cashflow. Clarity is needed on how this will be managed. Supporting software A dedicated forecasting and performance system is essential. Providers need confirmation that this will

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		be delivered and how tolerance levels will operate