

WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

Title of proposal:	Consultation on the proposed Apprenticeships Specification Cymru (ASC) under section 115 of the Tertiary Education and Research (Wales) Act 2022
Official(s) completing the Integrated Impact Assessment (name(s) and name of team):	Matthew Allman Melanie Thomas Evie Barnes Apprenticeship Team
Department:	Skills & Tertiary Education Directorate, Learning, Communities and Culture Group
Head of Division/SRO (name):	Neil Surman
Cabinet Secretary/Minister responsible:	Cefin Campbell MS
Start Date:	28 th May 2026

CONTENTS

Section 1. What action is the Welsh Government considering and why?	4
Section 8. Conclusion.....	7
Full Impact Assessments.....	11
A. Children’s Rights Impact Assessment.....	11
B. Equality Impact Assessment.....	17
C. WELSH LANGUAGE IMPACT ASSESSMENT	25

SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

Welsh Government is consulting on a proposed Apprenticeships Specification Cymru (ASC) under section 115 of the Tertiary Education and Research (Wales) Act 2022 (TERA) in relation to approved Welsh apprenticeships. Section 115 enables Welsh Ministers to specify requirements relating to apprenticeship framework content, including standards of attainment, qualification and training requirements, and the preparation, revision, withdrawal and publication of apprenticeship frameworks.

The proposal forms part of the transition from the current Specification of Apprenticeship Standards for Wales (SASW) under section 28 of the Apprenticeships, Skills, children and Learning Act 2009 and the legal framework established under that Act to the framework established under Part 4 of TERA. The policy intention is broadly to preserve the effect of SASW unless there is a clear rationale for change. The ASC therefore represents a combination of continuity, simplification and targeted reform rather than a wholly new apprenticeship specification.

The consultation seeks views on a proposed ASC and supporting documents. The proposals include requirements relating to:

- apprenticeship framework content;
- occupational competence;
- standards of attainment and assessment arrangements;
- the use of occupational standards where qualifications are unavailable or require development;
- Essential Skills requirements;
- recognised proxy qualifications for Essential Skills; and
- opportunities to increase access to Welsh-medium apprenticeship provision.

Draft Guidance and a draft List of Recognised Proxy Qualifications for Essential Skills (Wales) have also been developed to support implementation.

Qualifications will continue to play an important role within apprenticeship frameworks wherever they remain available and appropriate. However, the ASC introduces greater flexibility in how apprenticeship frameworks can be developed while maintaining confidence in occupational competence and quality. This includes providing flexibility where qualifications are unavailable or require development.

Long-term and Prevention

The proposals respond to long-term challenges affecting the apprenticeship and wider skills system in Wales, including changing labour market needs, evolving occupational requirements, increasing demand for higher-level and technical skills, digitalisation and the transition to a greener and more productive economy.

Welsh Government policy highlights the importance of ensuring apprenticeships remain responsive to employer need, economic change and future workforce requirements. The ASC is intended to strengthen the resilience and sustainability of the apprenticeship system by reducing barriers that may limit the ability of frameworks to respond to changing occupational, economic and workforce needs. By providing greater flexibility in how apprenticeship frameworks can be developed, the proposals seek to prevent future constraints that could limit responsiveness to skills needs, learner progression and employer demand. This preventative approach seeks to address underlying system pressures before they affect the quality, availability or relevance of apprenticeship provision.

Evidence from Qualifications Wales has also identified risks arising from reforms to post-16 vocational qualifications in England. These include both the potential withdrawal of qualifications currently used within Welsh apprenticeship frameworks and the development of new qualifications that may not meet the occupational competence requirements of Welsh apprenticeships. These developments have informed proposals intended to ensure Welsh apprenticeship frameworks can continue to support occupational competence where qualifications are unavailable or no longer align with the requirements of Welsh apprenticeships.

Integration

The proposal aligns with wider Welsh Government objectives for a responsive, high-quality and integrated tertiary education and skills system. It complements reforms being taken forward through TERA and Medr and supports wider objectives set out in the Apprenticeships Policy Statement, *Stronger, Fairer, Greener Wales: Employability and Skills Plan*, *Net Zero Skills Action Plan* and the *Strategic Direction for Vocational Education and Training in Wales*.

The proposals contribute to the well-being goals by supporting economic prosperity, workforce resilience, equality of opportunity, cohesive communities and the Welsh language.

The draft ASC includes a requirement for Medr, when developing, approving, reviewing or revising apprenticeship frameworks, to have regard to opportunities to increase access to Welsh-medium apprenticeship provision. This supports Welsh Government ambitions to increase opportunities for learners to access education, training and employment through the medium of Welsh, including the objectives of Cymraeg 2050.

Collaboration and Involvement

The proposals have been developed through collaboration with a number of key partners, including Medr, Qualifications Wales and Welsh Government policy and delivery colleagues. This engagement has informed the design of the ASC and supporting documents.

The current consultation provides an opportunity for learners, employers, providers, awarding bodies, representative organisations and other stakeholders to contribute to the development of the final proposals. Consultation responses and subsequent engagement will inform the development of the final proposals and supporting guidance.

Impact

As this is a consultation, further evidence is being sought on the potential benefits, risks and implementation impacts of the proposals. Areas being explored include the practical application of the proposed flexibility provisions, impacts on framework development and delivery, qualification availability and suitability, proposals relating to occupational competence and Essential Skills, and any sector-specific implications.

Consultation responses and subsequent engagement will help identify any unintended consequences, implementation challenges and sector-specific impacts and will inform final policy decisions.

Costs and Savings

Implementation is expected to be delivered primarily through existing Welsh Government, Medr and partner resources. Short-term resource implications relate mainly to policy development, publication, stakeholder engagement and associated planning activity. The proposals are not expected to create significant additional costs for Welsh Government beyond existing staff and programme resources.

Any future system costs arising from framework development, qualification reform or wider system changes would be considered separately through existing governance and funding arrangements. In the longer term, simplification of requirements and increased flexibility may reduce administrative burden, support more efficient management of apprenticeship frameworks and improve the ability of the system to respond to changing workforce, occupational and economic needs.

Mechanism

The proposal will be implemented through publication of the Apprenticeships Specification Cymru (ASC) under section 115 of TERA, supported by guidance and the List of Recognised Proxy Qualifications for Essential Skills (Wales). The findings of this Integrated Impact Assessment, together with consultation responses and further engagement, will inform the final ASC and supporting guidance.

SECTION 8. CONCLUSION

8.1 How have people most likely to be affected by the proposal been involved in developing it?

People with protected characteristics under the Equality Act 2010 have been considered through inclusive consultation processes that sought input from a diverse range of stakeholders. These included training providers, representative organisations and equality-focused groups, helping to identify potential impacts on access, participation and outcomes at an early stage.

Welsh speakers and Welsh language specialist groups have been engaged through consultation activity and ongoing policy discussions that explicitly consider Welsh-medium provision and the availability of apprenticeships and qualifications in Welsh. This supports Cymraeg 2050 objectives and ensures the needs of Welsh-speaking learners and employers are reflected.

A broad range of other stakeholders have also been involved, including employers, training providers, awarding bodies and sector representatives. The proposal draws on evidence from the 2024 Welsh Government consultation on SASW, Medr's consultation on the future Apprenticeship Programme, Qualifications Wales' engagement on post-16 vocational qualifications, and cross-policy discussions on reforms in England.

The forthcoming Section 115 consultation will provide a further opportunity for all groups to shape the final design and ensure an inclusive, joined-up approach to delivery.

8.2 What are the most significant impacts, positive and negative?

The strongest positive impact is the opportunity to create a more resilient specification for Welsh apprenticeships that combines flexibility with clear safeguards. The ASC retains occupational competence as the central outcome of approved Welsh apprenticeships whilst allowing alternative approaches where qualifications are unavailable or under development. The ASC and supporting guidance also establish a clearer national framework for apprenticeship development, approval and review, helping maintain consistency and confidence across the system whilst improving responsiveness to changing occupational and labour market needs.

The most significant risks are transitional and systemic. Whilst the ASC and supporting guidance provide a clear policy framework, there remains potential for uncertainty during transition, particularly where qualifications currently used within Welsh apprenticeship frameworks become unavailable or require replacement. Wider reforms in England amplify these risks because many apprenticeship qualifications currently used in Welsh apprenticeship frameworks may become commercially vulnerable or unavailable.

A particularly important point is that English reforms are not neutral for Welsh apprenticeships. Qualifications Wales's analysis confirms that the new V Levels, T Levels and Level 2 pathways in England are designed around threshold or entry competence and do not provide occupational competence. They cannot therefore act as direct like-for-like replacements within the current Welsh apprenticeship model. This reinforces the need for a Welsh specification that remains clear about occupational competence, standards of attainment and assessment requirements, whilst providing sufficient flexibility to respond where qualifications are unavailable. The use of National Occupational Standards (NOS), or where these do not exist, recognised occupational or professional standards, also helps maintain confidence that apprenticeship frameworks remain rooted in occupational competence.

8.3 In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals; and/or,**
- **avoid, reduce or mitigate any negative impacts?**
- The proposal supports the well-being goals, particularly A Prosperous Wales and A More Equal Wales, by maintaining a strong and responsive apprenticeship system that develops occupational competence and supports the acquisition of skills needed by employers and the wider economy. By allowing greater flexibility in qualification requirements where appropriate, the proposal should help improve accessibility to apprenticeships, support participation by individuals from a range of backgrounds and circumstances, and enable learners to develop their skills and fulfil their potential. The proposal will also help ensure apprenticeship frameworks remain aligned with employer and learner needs, supporting a skilled and well-educated workforce.
- Potential negative impacts will be mitigated through consultation on the draft ASC, supporting guidance and associated documents, enabling stakeholders to provide evidence on the practical implications of the proposals before they are finalised. Consultation responses, together with further stakeholder engagement, will be used to identify any unintended consequences, test sector-specific impacts, inform final policy decisions, and refine the ASC, guidance and supporting documents prior to publication. Welsh language and bilingual provision will also continue to be considered throughout the consultation and finalisation process to support the goal of a thriving Welsh language.

8.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

Evidence gathering and evaluation will begin during the consultation period. Stakeholders will be invited to provide evidence on the draft ASC, supporting guidance, Proxy List and associated proposals, including any impacts on learners, employers, providers, framework development, occupational competence, Essential Skills, qualifications and Welsh-medium provision. Consultation responses and subsequent engagement will be analysed and used to inform the final policy position and any revisions to the consultation documents before they are published.

Following implementation, Welsh Government and Medr may draw on existing apprenticeship statistics, management information, qualification market intelligence and sector feedback to understand how the reforms are operating in practice. This may include consideration of participation, framework operability, qualification availability, occupational competence outcomes and wider system resilience. Monitoring will help identify any emerging issues and inform future reviews of the specification, guidance and associated arrangements.

FULL IMPACT ASSESSMENTS

A. CHILDREN'S RIGHTS IMPACT ASSESSMENT

1. Policy objectives

- The decision being impact assessed is the introduction of new requirements under section 115 of the Tertiary Education and Research (Wales) Act 2022 in relation to approved Welsh apprenticeships. The objective is to replace the current Specification of Apprenticeship Standards for Wales (SASW) with a more flexible and resilient specification.
- Expected positive impacts include increased resilience and sustainability of apprenticeship pathways and stronger alignment with labour market demand. Potential negative impacts may arise from temporary uncertainty associated with framework revisions. These risks will be mitigated through stakeholder engagement, clear guidance and ongoing monitoring of impacts on learners
- While the policy applies directly to apprenticeship providers and commissioning arrangements, it has an indirect impact on learners aged 16-18 and, in some circumstances, young people up to the age of 25 who participate in apprenticeships. Under the United Nations Convention on the Rights of the Child (UNCRC), children are defined as individuals under the age of 18. In Wales, there is also a requirement to have due regard to the UNCRC when considering the interests of young people up to the age of 25.
- The policy also supports the broader legislative framework for children and young people in Wales, including the principles and duties set out in the Social Services and Well-being (Wales) Act 2014, which promotes wellbeing, participation and support for individuals to achieve their personal outcomes. In addition, the proposal aligns with the ambitions of the Additional Learning Needs and Education Tribunal (Wales) Act 2018, which seeks to improve outcomes and ensure appropriate support for children and young people with additional learning needs up to the age of 25.

2. Gathering evidence and engaging with children and young People

- The evidence draws on the 2024 Welsh Government consultation on SASW and engagement with providers, employers, awarding bodies and representative organisations. Although no direct consultation with children or young people was undertaken, and consultation responses were not reported separately by age group, feedback highlighted the importance of ensuring learners are not disadvantaged by changes, particularly in relation to accessibility, reasonable adjustments, clear

guidance and progression opportunities for apprentices, including those with additional learning needs.

This feedback has informed the policy approach by reinforcing the need for a flexible and responsive apprenticeship system, supported by clear implementation guidance, stakeholder engagement and ongoing monitoring of impacts on learners

- Further direct engagement could be undertaken through representative bodies (e.g. youth organisations, providers, Young Wales) during consultation or implementation. This reflects the intention to strengthen alignment with Article 12 (right to be heard) going forward

Impact on different groups of children and young people

The proposal may affect groups differently:

- **16–18 learners / early entrants:** most reliant on clear progression routes; may be more affected by complexity or instability
- **Young people with Additional Learning Needs (ALN):** may benefit from flexible approaches but require clear, consistent support arrangements
- **Young people from low-income households:** more likely to be affected by reduced access, travel barriers or unclear pathways
- **Welsh-speaking young people:** may be affected if qualifications or provision through the medium of Welsh are reduced
- **Care-experienced or vulnerable young people:** may be disproportionately impacted by system complexity or transition disruption

3. Analysing the evidence and assessing the impact

Overall impact on children and young people

The policy is expected to have a **moderate positive impact overall**, with some **short-term transitional risks**. The current policy is designed to support apprenticeship participation across all age groups. However, the positive impact could be strengthened by embedding learner voice into future framework reviews and incorporating equality and inclusion considerations into implementation guidance. These measures would further support a child-centred approach.

Positive impacts

- Greater flexibility may **support continued availability of apprenticeship routes**, protecting access for young people
- Improved alignment with labour market demand may enhance **progression to employment (Article 6)**
- Simplification of requirements may improve **clarity of pathways**, especially for new entrants
- Flexibility in delivery may support **inclusive access**, particularly for learners with ALN (Article 23)

Negative risks

- Transition to a new specification may create **temporary uncertainty or disruption**
- Increased flexibility could lead to **inconsistency or reduced clarity** if not well-defined
- Changes in qualification availability could limit access in some sectors
- Complexity may disproportionately affect those with less support or experience navigating the system

Mitigation measures

- Clear definitions and guidance to maintain consistency
- Protection of occupational competence as a core requirement
- Transitional arrangements to safeguard current learners
- Explicit retention of reasonable adjustments and support for ALN learners
- Clear expectations around assessment of learner needs, including Essential Skills
- Ongoing monitoring of qualification availability and sector impacts
- How does your proposal enhance or challenge children's rights, as stipulated by the UNCRC articles and its Optional Protocols?

UNCRC Article	Enhances	Challenges	Explanation
---------------	----------	------------	-------------

Article 2 (Non-discrimination)	X		Flexible frameworks may widen access if implemented equitably. Implementation should be monitored to ensure no group of children or young people is disadvantaged.
Article 3 (Best interests of the child)	X		The proposal seeks to support young people's educational and employment outcomes, taking account of their best interests
Article 6 (Development)	X		Apprenticeships supports children's development through access to skills, learning and progression opportunities
Article 12 (Right to be heard)		X	Limited direct engagement with young people to date; to be strengthened through consultation
Article 23 (Disability)	X		The proposal provides appropriate support for access to education and training for children and young people with disabilities where needed

Article 28 (Education)	X		Supports continued access to post-16 education and training routes
Article 29 (Aims of education)	X		Supports development of skills relevant to work and society

The assessment has also considered Article 13 (access to information) and Articles 32 and 36 (protection from exploitation and harm). The proposal supports access to apprenticeship information and opportunities, while existing quality assurance, safeguarding and oversight arrangements help protect learners from poor-quality provision or experiences that could adversely affect their wellbeing, development or education.

In addition, the assessment has taken account of relevant UNCRC Concluding Observations and General Comments, including those relating to education, participation, the best interests of the child and support for young people transitioning into employment and training. These considerations are reflected throughout the assessment and have informed the overall conclusion that the proposal is expected to have a positive impact on children and young people accessing apprenticeships.

- Consider whether any EU Citizens Rights (as referenced in the Equality Impact Assessment) relate to young people up to the age of 18.

The proposal has been developed in line with the principle of equal treatment and does not introduce any provisions that would disadvantage EU Citizen Rights under the age of 18. Continued monitoring during implementation will ensure that any unintended differential impacts are identified and addressed.

4. Ministerial advice and decision

This assessment indicates that the proposal is broadly consistent with children's rights obligations, provided implementation maintains:

- clarity and consistency of pathways
- equitable access for all groups
- explicit support for vulnerable learners

Ministerial advice should therefore:

- recognise the moderate positive impact on young people
- emphasise the importance of mitigation measures
- support continued engagement with children and young people through consultation and implementation

- **Communicating with Children and Young People**

If young people are engaged during consultation:

- Feedback should be communicated through accessible summaries
- Consideration should be given to producing **child-friendly versions** of consultation outcomes
- Engagement could be supported through representative organisations and providers

-
-
- **Monitoring and Review**

The impact on children and young people will be monitored through:

- Apprenticeship participation and completion data by age group
- Progression outcomes into employment or further learning
- Monitoring of access across different groups (e.g. ALN, socio-economic background)

- Feedback from providers and learner representatives
- Ongoing analysis of qualification availability and framework viability

A review of the CRIA should be undertaken post-implementation to assess:

- whether anticipated impacts have materialised
 - whether any unintended consequences have arisen
 - whether further mitigation or policy adjustment is required
- Following this review, are there any revisions required to the policy or its implementation?

None identified at this stage. Consultation responses and subsequent policy development will be considered before finalising the ASC, supporting guidance and associated documents. Any revisions required following implementation will be considered through normal policy review arrangements.

B. EQUALITY IMPACT ASSESSMENT

1. Describe and explain the impact of the proposal on people with protected characteristics as described in the Equality Act 2010.

Promoting equality

The proposal to introduce new requirements for approved Welsh apprenticeships under section 115 of the Tertiary Education and Research (Wales) Act 2022 is intended to support the Public Sector Equality Duty, in particular, the aim of advancing equality of opportunity. The proposal seeks to create a more flexible and resilient framework for apprenticeships, enabling the system to respond more effectively to changes in qualifications, occupational requirements and labour market demand.

Accessible and sustainable apprenticeship routes are particularly important for some people with protected characteristics who may face barriers to other forms of education, training or employment. Stakeholder feedback has highlighted the importance of ensuring that work-based learning opportunities remain available, accessible and responsive to learner needs.

The flexibility provided by the new requirements may help support participation where apprenticeships need to accommodate different learner needs, including through

reasonable adjustments, accessible delivery approaches and consideration of individual circumstances.

Consultation and ongoing stakeholder engagement will be used to gather further evidence on the potential effects of the proposal for people with protected characteristics. This will help inform the final policy approach and identify whether any additional mitigation or support measures are required to promote equality of opportunity and avoid unintended barriers to participation.

Potential negative impacts and mitigation

Potential negative impacts are primarily associated with transition and implementation:

Potential negative impact: Increased flexibility could lead to inconsistency or reduced clarity if requirements are not tightly defined.

Mitigation: Clear requirements and supporting guidance will be provided to ensure consistency in interpretation and implementation.

Potential negative impact: Temporary disruption arising from qualification changes may disproportionately affect learners with less access to advice, guidance and support.

Mitigation: Phased implementation arrangements and protection for existing learners will minimise disruption during the transition period. Ongoing stakeholder engagement and monitoring will help identify and address emerging issues.

Potential negative impact: Increased complexity may create barriers for learners with additional learning needs (ALN) or those from disadvantaged backgrounds.

Mitigation: Reasonable adjustments for learners with ALN will be retained and strengthened.

Barriers and how they can be reduced

Barriers faced by individuals with protected characteristics may include:

- access to suitable provision (including geographic and Welsh-medium availability);
- clarity of entry requirements and progression routes;
- additional support needs (e.g. disability, language, socio-economic barriers).

These barriers can be reduced through:

- Welsh Government providing clear and coherent requirements through ASC and supporting guidance
- Medr developing, maintaining and reviewing apprenticeship frameworks in accordance with ASC and associated guidance;

- ensuring flexibility is applied in a transparent and equitable way by employers and providers; and
- continued consideration of learner needs, including disability, language and other barriers that may affect participation and progression.

Internal challenge and wider consideration

The EqIA will be shared across Welsh Government, including with Equality and Human Rights Division colleagues and relevant policy areas, to test assumptions and identify any unintended consequences. Ongoing engagement with stakeholders will further inform the assessment.

Use of evidence

Formal evidence for this assessment has been drawn from the 2024 SASW consultation. In addition, the assessment has been informed by ongoing discussions with Medr and Qualifications Wales, as well as learning from wider post-16 education and training reforms.

This evidence and stakeholder intelligence have been used to identify potential differential impacts and inform the development of mitigation measures.

Measuring success

Success will be demonstrated through:

- sustained or improved participation in apprenticeships across protected groups;
- stable access to apprenticeship pathways across sectors;
- positive learner outcomes, including completion and progression;
- stakeholder feedback indicating clarity and accessibility.

Outcomes framework

An outcomes framework will be supported through:

- Medr apprenticeship data (participation, achievement, progression);
- monitoring of access by protected characteristic where data is available;
- sector-level intelligence on framework operability;
- ongoing evaluation following implementation.

Record of Impacts by protected characteristic:

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
Age (think about different age groups)	Mixed, overall positive	Apprenticeships support all-age participation; younger learners may be more affected by instability or lack of clarity	Maintain clear pathways; protect entry routes; provide guidance and progression support
Disability (consider the social model of disability ¹ and the way in which your proposal could inadvertently cause, or could be used to proactively remove, the barriers that disable people with different types of impairments)	Potentially positive, with risks	Flexibility may enable reasonable adjustments, but inconsistency could create barriers if poorly implemented	Retain clear arrangements relating to accessibility, reasonable adjustments and learner support. Where Essential Skills are not included, frameworks must ensure that learner needs are identified, including through initial assessment, and that appropriate support is provided where required.

¹ Welsh Government uses the social model of disability. We understand that disabled people are not disabled by their impairments but by barriers that they encounter in society. Ensuring that your proposal removes barriers, rather than creating them, is the best way to improve equality for disabled people. For more information, go to the intranet and search 'social model'.

Gender Reassignment (the act of transitioning and Transgender people)	Neutral	No direct policy impact identified; indirect impacts depend on broader access and inclusivity of provision	Ensure inclusive guidance and provider awareness
Pregnancy and maternity	Potentially positive	Flexible delivery may support participation, but disruption could affect continuity	Encourage flexible delivery models; protect continuation routes
Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)	Potentially positive, with risks	Flexible access may widen participation; however, complexity or instability may disproportionately affect some groups	Ensure clarity of pathways; strengthen guidance and support mechanisms
Religion, belief and non-belief	Neutral	No direct impacts identified	<u>Maintain equitable access through non-discriminatory implementation, including consideration of faith and belief requirements where relevant to apprenticeship delivery.</u>
Sex / Gender	Neutral overall	No direct policy impact; sectoral patterns in apprenticeships may influence outcomes	Monitor participation trends; promote access to under-represented groups
Sexual orientation	Neutral	No direct impacts identified	Maintain inclusive approach in delivery

(Lesbian, Gay and Bisexual)			
Marriage and civil partnership	Neutral	No direct relevance identified	Not required
Children and young people up to the age of 18	Positive, with transitional risks	Apprenticeships are a key route for young people; clarity and stability are critical	Protect clear entry routes; ensure strong guidance and support during transition
Low-income households	Potentially positive, with risks	Apprenticeships provide paid training routes; complexity or travel requirements may increase barriers	Provide clear information; support accessible provision; mitigate transition impacts

Human Rights and UN Conventions

Do you think that this policy will have a positive or negative impact on people's human rights?

Overall, no adverse human rights impacts have been identified.

Human Rights	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate negative Impacts?
Right to education (ECHR Protocol 1, Article 2)	Positive overall	Supports continued access to vocational education and training pathways	Maintain stability and clarity of access routes
Right to non-discrimination (Article 14)	Positive	Policy applies on an equitable basis and	Monitor impacts and address disparities

		supports inclusive access	
Right to work / fair conditions (ICESCR)	Positive	Apprenticeships support access to employment and skills development	Ensure quality and consistency of provision

EU/EEA and Swiss Citizens' Rights

The proposal does not introduce any changes that would affect the protected rights of EU, EEA or Swiss citizens under the Citizens' Rights Agreements.

Assessment by area:

- **Residency rights:** No impact. The proposal does not affect immigration or residency status.
- **Mutual recognition of qualifications:** No direct impact. The proposal relates to Welsh apprenticeship framework requirements rather than recognition of overseas qualifications.
- **Access to social security systems:** No impact. The proposal does not alter eligibility for benefits or public services.
- **Equal treatment:** Positive/neutral. The proposal applies on a non-discriminatory basis and supports equitable access to apprenticeships.
- **Workers' rights:** Neutral. The proposal does not amend employment rights.

EU/EEA/Swiss citizens who are eligible to participate in apprenticeships will continue to have the same access and entitlements as UK nationals.

No negative impacts have been identified, and legal advice is not considered necessary at this stage.

C. WELSH LANGUAGE IMPACT ASSESSMENT

1. Welsh Language Impact Assessment reference number (completed by the Welsh Language Standards Team, email: Safonau.Standards@gov.wales):
2. Does the proposal demonstrate a clear link with the Welsh Government's strategy for the Welsh language?

The proposal recognises that supporting Welsh-medium provision is not solely a matter of responding to existing learner demand, but also of encouraging participation and access to Welsh-medium tertiary learning opportunities in line with statutory Welsh language objectives. It demonstrates a clear and direct link with **Cymraeg 2050: A million Welsh speakers** and the associated Work Programme (2021–2026), across the three strategic themes:

- Increasing the number of Welsh speakers and the use of Welsh: by supporting access to apprenticeships through the medium of Welsh and maintaining viable progression routes for Welsh-speaking learners across post-16 education.
- Increasing the use of Welsh: by shaping apprenticeship requirements which can promote and normalise the use of Welsh in training and the workplace.
- Creating favourable conditions: by strengthening the resilience of the apprenticeship system, including the availability of Welsh-medium and bilingual qualifications, which underpin skills development in Welsh-speaking communities and sectors.

The proposal is particularly aligned with Work Programme priorities relating to:

- expanding post-16 Welsh-medium provision;
- increasing the availability and range of vocational pathways in Welsh; and
- ensuring parity of access to services in Welsh.

By embedding consideration of Welsh language within apprenticeship framework requirements, the proposal supports a more sustainable and future-proofed system that contributes to the long-term aim of increasing the number of Welsh speakers and use of Welsh.

3. Describe and explain the impact of the proposal on the Welsh language, and explain how you will address these impacts in order to improve outcomes for the Welsh language. How will the proposal affect Welsh speakers of all ages (both positive and/or adverse effects)? You should

note your responses to the following in your answer to this question, along with any other relevant information:

The proposal is expected to have a moderate impact overall, with the potential for positive outcomes if Welsh language considerations are embedded effectively, alongside notable risks linked to qualification availability and system transition.

Impact on Welsh speakers of all ages

Positive effects

- A more flexible and resilient apprenticeship system can help maintain access to Welsh-medium pathways for young people and adults.
- Greater alignment with labour market needs may support continued use of Welsh in the workplace, particularly in sectors where Welsh is a key skill.
- Simplification may improve clarity of pathways for Welsh-speaking learners entering or progressing within apprenticeships.

Adverse risks

- Reduced availability of supporting qualifications in Welsh may limit access for Welsh-speaking learners.
- Increased flexibility, if not clearly defined, may lead to inconsistency in Welsh-medium provision.

Mitigation

- ASC includes a requirement for Medr to have regard to opportunities to increase access to Welsh-medium apprenticeship provision when developing, approving, reviewing or revising apprenticeship frameworks.
- Maintain clear pathways and guidance for Welsh-speaking learners.
- Continue engagement with Cymraeg 2050 officials, Medr and other relevant stakeholders to support alignment with wider Welsh language objectives.
- Participation, achievement and progression outcomes may be monitored through existing Medr performance and management information arrangements where data is available.

How will the proposal affect the sustainability of Welsh speaking communities² (both positive and/or adverse effects)?

Welsh speaking communities

Positive effects

- Apprenticeships support local employment and skills retention, contributing to the sustainability of Welsh-speaking communities, particularly in rural areas.
- Flexible frameworks may help sustain provision in low-volume sectors.

Adverse risks

- Loss of local or sector-specific Welsh-medium provision could undermine community sustainability, particularly in predominantly Welsh-speaking areas.

Mitigation

- Work with partners to maintain geographically accessible provision.
- Consider opportunities to support sectors and geographic areas where Welsh language skills are strategically important, informed by Welsh language data, labour market evidence and stakeholder engagement
- Consider Welsh language impacts within rural proofing and implementation planning.

How will the proposal affect Welsh medium education and Welsh learners of all ages, including adults (both positive and/or adverse effects)?

Positive effects

- Supports continuity between Welsh-medium education and post-16 vocational routes.
- Potential to strengthen lifelong learning opportunities in Welsh, including adult learners.

Adverse risks

- Qualification reform and market changes may reduce the range or availability of Welsh-medium learning materials and qualifications.

² These can be close-knit rural communities, dispersed social networks in urban settings, and in virtual communities reaching across geographical spaces.

- Without effective planning across the wider tertiary system, there is a risk of unintended impacts on learners choosing alternative Welsh-medium post-16 pathways.

Mitigation

- Support continued availability of bilingual qualifications and supporting materials where feasible and appropriate.
- Maintain alignment with wider post-16 Welsh-medium policy and planning through ongoing engagement with Cymraeg 2050 officials and Medr's strategic approach to increasing demand for and participation in Welsh-medium tertiary education
- Engage with Medr and relevant Welsh language stakeholders, including Coleg Cymraeg Cenedlaethol where appropriate, to support Welsh-medium learning opportunities.

How will the proposal affect services³ available in Welsh (both positive and/or adverse effects)?

Positive effects

- Opportunity to strengthen Welsh-language provision across the apprenticeship system, contributing to wider public services (e.g. workforce supply in health, social care and local government).

Adverse risks

- Inconsistent application of flexibility may lead to uneven access to services in Welsh.

Mitigation

- Ensure parity between Welsh and English language services within guidance and implementation.
- Embed Welsh language expectations in provider requirements and contracts.

How will you ensure that people know about services that are available in Welsh and are able to access and use them as easily as they can in English?

All information, guidance and supporting documents (including qualification lists) will be fully bilingual and equally accessible.

³ The Welsh Language Strategy aims to increase the range of services offered to Welsh speakers, and to see an increase in use of Welsh-language services.

- Communication will ensure Welsh speakers can identify and access provision in Welsh easily, including through digital channels and provider engagement.
- Engagement with stakeholders will support awareness-raising and uptake of Welsh-medium opportunities.

What other evidence would help you to conduct a better assessment?

Further evidence outlined below would help in conducting a better assessment

- More detailed data on Welsh-medium apprenticeship participation and completion;
- Provider capacity for Welsh-medium and bilingual delivery;
- Sector-specific evidence on Welsh language demand and skills needs.

This will be gathered through consultation and ongoing engagement.

- ♦ How will you know if your policy is a success?

Success will be evidenced by:

- Sustained or increased participation in Welsh-medium apprenticeships;
- Continued availability of key qualifications in Welsh;
- Positive completion and progression outcomes for Welsh-speaking learners;
- Stakeholder feedback indicating clear, accessible and consistent provision;
- Evidence of increased use of Welsh in apprenticeship settings and workplaces.

Ongoing monitoring may draw on Medr data, stakeholder feedback and Qualifications Wales intelligence. Welsh Government will continue to engage with relevant policy teams, including Cymraeg 2050 officials, to consider Welsh language implications arising from implementation.

