

Learner Engagement Code

Sector briefing: apprenticeships



Introduction

Under Section 129 of the Tertiary Education and Research (Wales) Act 2022, Medr has a statutory responsibility to publish a Learner Engagement Code about the involvement of learners in their provider's decision-making. This includes opportunities for learners to:

- participate in the making of relevant decisions by their provider;
- have their voices effectively represented in provider decision-making; and
- give their views on the education they are receiving and matters of concern or interest to them.

Medr [consulted](#) on the draft Learner Engagement Code in autumn 2025, and published [the final Code](#) in April 2026. The Code applies to all providers in the tertiary education sector in Wales: further and higher education institutions, **apprenticeship providers**, adult community learning providers, and schools with sixth forms. Apprenticeship providers will be required to comply with the Code from **1 August 2027**, as a condition of funding.

During our consultation and wider discussions with the tertiary sector, providers asked us to ensure that the Code is tailored to the very different types of organisation and diverse learners in different parts of the sector. We have developed this briefing as part of a suite of reference materials to contextualise the Code to each part of the tertiary sector, and to provide practical information on how the Code can be implemented and evidenced in different settings. It should be read alongside the Code itself, which sets out the specific requirements that all providers must meet and the evidence they must provide to Medr to demonstrate compliance.

We will keep this briefing under review to reflect feedback from learners and providers, and to add further resources and examples as they are developed.

Who is this briefing for?

- Apprenticeship provider staff and Board members
- Apprentices including those in representative roles such as course representatives
- Employers

Sector context: Apprenticeships

Apprentices are employees who do most of their learning in the workplace. This means their employer may not release them to take part in any formal learner engagement activities. They may be the only apprentice in their workplace, or one of a small number, with few opportunities to meet their peers. The apprentice's key engagement with their provider is through their assessor, who is typically their main contact for providing feedback about their learning experience, or raising any concerns.

This means that providers will need to tailor their approach to learner engagement to meet learners' needs, which could mean, for example, shorter "bite sized" forums, digital

platforms, timetabling of sessions outside of working hours, and recognition of learners' time and contributions (for example, through certificates or digital badges).

Medr does not expect or require apprenticeship providers to have a students' union or equivalent formal, permanent learner representative body. The Learner Engagement Code does not define specific mechanisms or structures that providers must use. However, it does require providers to ensure that learner engagement informs providers' strategic decisions and policies at an organisational level.

Requirements of the Code

Requirements for 2027 – 2028

- Apprenticeship providers **must** publish a commitment to embed and support impactful learner engagement in decision-making before the end of the academic year
- This **must** align with the principles of The Code
- Evidence required via the Annual Assurance Return (Autumn 2028)

Requirements from 2028 – 2029

- Apprenticeship providers **must** annually review the commitment
- Apprenticeship providers **must** provide evidence of impact of learner engagement
- Evidence required via the Annual Assurance Return (from Autumn 2029)

Governance

- The governing body (or equivalent) **must** confirm compliance annually
- Assurance required via the Annual Assurance Return (from Autumn 2028)

Learners

- Learners **must** be engaged in the development and review of the commitment
- The commitment **must** be promoted in accessible ways to learners

The commitment **must** include:

- How learner engagement in decision-making is embedded and supported
- How any learner representative body co-developed (reviewed) the commitment
- How learners have been engaged in development (and review)
- How the views of diverse learners are taken into account
- Which learners are covered

Wherever a learner representative body (e.g. SU, council, Senedd) exists the provider **must** work in partnership with them to:

- co-produce the commitment
- annually review the commitment

- promote it in accessible ways to learners through provider and learner representative body channels

Wherever a learner representative body exists they **must** sign the commitment to provide confirmation of the above requirements in relation to partnership working.

The learner engagement commitment

The Learner Engagement Code requires providers to work with their learners to develop and publish a commitment to embedding and supporting impactful learner engagement in decision-making in line with the principles of the Code.

The commitment is intended to be a clear and honest reflection of current learner engagement in decision-making, rather than an aspirational statement of intent, and should be used as a continuous improvement tool to recognise strengths, identify areas for development, and address gaps.

Apprenticeship providers must ensure that any partners including consortium members or sub-contractors are included in their commitment, and that monitoring of the commitment includes sub-contracted provision.

Where a college is a lead provider for apprenticeships, it must ensure that apprentices are appropriately integrated into its overall commitment and approach to learner engagement. Medr does not expect colleges to prepare a separate commitment for apprenticeship provision but will expect to see evidence that apprentices are engaged in decisions relating to their programmes and experiences.

Providers may wish to use their commitment to set out clearly which topics and decision areas are within the scope of the provider's, rather than the employer's, influence and control.

Medr is not prescriptive about the structure or format of the commitment and advises that this should take the most appropriate form for each provider or consortium and its learners, this may include a more streamlined or visual demonstration of learner engagement with links to more formal written documents where necessary to meet the requirements of the Code.

Apprenticeship providers can engage with learners effectively by:

- Providing clear information to learners at induction on their rights, how they can share their views, raise concerns or complaints
- Providing routes for learners to engage in decisions and give feedback which are independent from their employer and their assessor
- Ensuring that learners are able to raise sensitive issues confidentially
- Systematically collating, analysing and responding to learner views in order to build an overall picture, including feedback gathered through progress reviews and other engagement between learners and individual assessors

- Ensuring that there are structures in place for assessors to capture learners' views, concerns and suggestions, feed these into quality assurance processes, and escalate any concerns
- Building learner engagement into the planning and evaluation of organisational decisions that affect the learner experience (see below for examples of decisions)
- Considering appropriate methods to collectively engage learners in decisions that affect them, such as digital platforms, forums or focus groups; these could be fixed structures or convened on an ad-hoc basis, depending on the types of decision being made and the needs of learners
- Considering how to embed representation structures at employer level where there is a critical mass of apprentices, to allow learners to support each other and to gather collective views and input to inform decisions
- Providing training and guidance for any learners with a representative role
- Ensuring that their senior leadership team, Board (if applicable), and any relevant groups or committees have learner engagement and learner voice as a standing item at meetings
- Formally recording and monitoring changes and improvements that have been made in response to learners' views
- Having mechanisms to tell learners how their views have impacted on decision-making and influenced the provider's practices

Examples of “relevant decisions” for apprentices could include:

- Selecting, testing, implementing and evaluating software used by learners, such as e-portfolios
- Developing and reviewing the provider's complaints policy
- Developing and reviewing the provider's strategy for essential skills assessment and delivery
- Co-ordination of on- and off-the-job training activities
- Reviewing the availability of Welsh medium opportunities and resources
- Developing and implementing policies on learner support and wellbeing

Useful links and resources

Medr funds the National Union of Students (NUS) Charity to support learner voice and engagement in the apprenticeship sector. Providers should make use of resources funded by Medr to embed and support impactful learner engagement in decision-making.

To inform the development of this briefing, Medr commissioned the National Union of Students Cymru to undertake focus groups with apprentices. A summary of the outcomes is attached at **Annex A**.

Contact us

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Annex A

Learner Engagement Code: Apprentice focus group insights

As part of its consultation on the Learner Engagement Code, Medr commissioned the National Union of Students (NUS) Cymru to undertake focus groups with apprentices. The feedback received is summarised below and has been used to inform the development of the apprenticeships sector briefing accompanying the Code.

As well as providing some initial feedback to help shape how the Code will work for the apprenticeships sector, the focus groups functioned as a pilot to help test effective methods for engaging apprentices within a newly regulated tertiary system. These sessions represent a first step towards establishing a consistent and sustainable apprentice voice to inform Medr's work over time.

The focus groups were not intended as a representative picture of apprentices' experiences, or to gauge the effectiveness of learner engagement in their specific providers, but to provide summary insights into how apprentices understand engagement and what they would like to see.

Methodology

Two online focus groups were carried out in November and December 2025, attended by 16 apprentices in total. Participants were enrolled at a range of further education institutions and independent training providers, and were undertaking programmes between Level 2 and Level 5. To support recruitment and thank participants for their time, each attendee was given a £25 voucher.

NUS Cymru worked with Medr to design questions around apprentices' experiences of learner engagement, including:

- What 'good' engagement looks and feels like for them
- How informed they feel as learners on opportunities for engagement
- Where they go for help or feedback
- What makes them feel valued and listened to
- How they would like to engage and have a voice in future

Overview of research insights

- Apprentice engagement is reported to be strongest at individual assessor level, providing an effective way to address immediate issues and build positive working relationships. There is an opportunity to strengthen this further through provider-level mechanisms that offer consistent and transparent learner engagement across the organisation.
- While apprentices are generally comfortable sharing feedback with their assessors, some are less clear about alternative feedback routes, how feedback is used, or how decisions impacting their learning are communicated. Increasing visibility of these processes could help apprentices feel more informed and engaged.

- Providers could enhance induction by clearly explaining the different ways apprentices can provide feedback, raise concerns, and access escalation routes where required, including situations involving their assessor.
- Establishing and promoting clear escalation pathways can help strengthen apprentice confidence in provider responsiveness and accountability.
- In some instances, apprentices look to their employers for support in resolving provider-related issues. Providing well-understood provider-led processes could help ensure a more consistent experience for all apprentices.
- Providers should also offer safe mechanisms for raising sensitive or confidential concerns, giving apprentices confidence that issues can be addressed without negative consequences.

Key themes

Maximising the 1-1 relationship with assessors

Participants consistently described frequent and structured touchpoints with their assessor which formed their main mechanism for communication, feedback and support.

Assessors were widely described as approachable, responsive, and understanding of workplace pressures.

At an individual level, assessor-led engagement is effective and valued, particularly for pastoral support and local problem solving.

While the relationship was highly valued, participants recognised that this could become a limitation if the relationship broke down or if the assessor was not the right fit.

Methods for providing feedback

Participants described their engagement as largely or entirely taking place at assessor level, with limited interaction between apprentices and the provider beyond this relationship.

Apprentices reported limited recall of information provided at induction about learner rights, feedback processes, and routes for raising concerns, indicating scope to strengthen and reinforce these messages throughout the learner journey.

Digital platforms were quoted as having a central role in engagement with providers and identified opportunities to improve usability, navigation, and accessibility of these systems to enhance engagement and the learner experience.

A few participants reported having received provider surveys, but most had not been asked to give this type of feedback to their provider.

Involvement in decision-making individually and as a collective

Participants reported no prior experience of being involved in decision-making and were generally unaware of opportunities to influence decisions about their learning.

Interest in greater involvement varied, reflecting different learner preferences and levels of available time and capacity.

Participants expressed a lack of spaces to share experiences with other apprentices or to explore common challenges together.

Feedback loops and escalation routes

Although participants routinely provide feedback during assessor reviews, many were unclear about how feedback is reviewed beyond the assessor level or how it informs provider-wide decisions, highlighting an opportunity to increase transparency around feedback processes and outcomes.

There was limited awareness of how to provide feedback at provider level or how to engage in decisions affecting their apprenticeship (for example: concerns about assessment deadlines, course structure and delivery, and digital systems).

There was also a clear desire for confidential or anonymous ways to raise concerns.

What good engagement looks like to apprentices

Participants were clear that effective engagement should be simple, transparent, and meaningful. They emphasised the importance of clear lines of communication, improved awareness of feedback and escalation routes, and visible accountability through closing the feedback loop.

Peer connection opportunities would be valuable to participants.

Engagement should be proportionate, recognising that apprentices are time-poor. Local, individual issues should continue to be resolved quickly through assessors, but apprentices want the ability to engage beyond this level when needed.

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