

Medr draft strategic plan: Universities Wales and Chairs of Universities Wales consultation response

October 2024

About Universities Wales

Universities Wales represents the interests of universities in Wales and is a National Council of Universities UK. Universities Wales' membership encompasses the Vice Chancellors of all the universities in Wales, and the Director of the Open University in Wales.

Our mission is to support a university education system which transforms lives through the work Welsh universities do with the people and places of Wales and the wider world.

Universities Wales welcomes the opportunity to respond to Medr's consultation on its draft strategic plan.

About Chairs of Universities Wales

Chairs of Universities Wales (ChUW) is the representative body for the Chairs of the governing bodies of the universities in Wales. It provides a forum for Chairs to consider and formulate a collective view on key matters that fall within the purview of their governing bodies and underpin the effective operation of the universities and of the Welsh higher education sector as a whole for the benefit of Wales and its people.

Summary

- The creation of a single regulator and funder for tertiary education and research offers an opportunity to improve collaboration, increase participation, strengthen pathways including for lifelong learning and part-time provision, and build upon the international excellence and reputation of Welsh education.
- This opportunity comes at a crucial time where we face large-scale socio-economic challenges, significant shifts in the occupation landscape in Wales, and an uncertain global environment.
- Universities are national assets. Rooted in communities in Wales, our universities have a total economic impact of £11bn. They support the foundational economy, build supply chains, and generate and sustain new businesses.

- More than that, they also have a tangible and transformational impact on people's lives. This impact can be seen throughout Wales' history, whether through the delivery of higher education provision that opens up new opportunities and broadens horizons, or through the research and innovation activity that shifts the way public services operate, increases productivity or delivers ground-breaking discoveries.
- Welsh universities also support public services by:
 - Training public sector staff including teachers, nurses and doctors
 - Providing poverty reduction programmes
 - Providing access to free advice and services including law clinics
 - Providing facilities to communities including sporting facilities and nurseries
 - Providing arts and community centres, parks and botanic gardens.
- Universities Wales and ChUW welcome the opportunity to respond to Medr's draft strategic plan and support the ambitions set out in the plan: to build coherence, support transitions, improve outcomes, reduce inequalities, engage learners and grow Welsh research and innovation.
- Currently, Welsh universities face **significant, challenging circumstances**. Our response to the draft plan should be read alongside a consideration of the current context we find ourselves in.
- **The draft plan is right to emphasise a need for increased participation.** Wales is facing a stark decline in participation in tertiary education: Wales lags behind other UK nations in higher education participation, particularly among 18-year-olds and those from disadvantaged backgrounds. A concerted effort is needed to raise aspirations and improve access.
- **There is scope for increased emphasis within the plan on internationalisation.** Internationalisation is vital to the Welsh tertiary education sector, contributing socially and culturally as well as financially and economically. We recommend a dedicated strategic aim focused on promoting a global outlook, recognising the value of international students and staff, global education and research partnerships, and staff and student mobility.
- The plan has a **positive focus on growing the scale of research and innovation in Wales**. There is an opportunity for Medr build the reputation and competitiveness of Welsh research and innovation and, in doing so, make Wales a more attractive destination for business and investment.
- **There is an opportunity for Medr to set ambitious targets** on increasing overall participation, closing the gap between the least and most disadvantaged groups in Wales, and on growing the scale of research and innovation in Wales.
- **Universities Wales looks forward to collaborating effectively with Medr and the wider sector.** Medr should build on the positive relationships established with HEFCW and engage proactively with the tertiary sector in developing operational plans and regulatory arrangements.

Universities Wales and ChUW are committed to working with Medr to ensure a thriving tertiary education and research sector in Wales that benefits learners, society, and the economy.

Part One: legislative duties & evidence

1. The Tertiary Education and Research (Wales) Act 2022 places eleven strategic duties on Medr to:

1. Promote lifelong learning
2. Promote equality of opportunity
3. Encourage participation in tertiary education
4. Promote continuous improvement in tertiary education
5. Promote research and innovation
6. Promote collaboration and coherence in tertiary education and research
7. Contribute to a sustainable and innovative economy
8. Promote tertiary education through the medium of Welsh
9. Promote a civic mission
10. Promote a global outlook
11. Promote collaboration between providers of tertiary education and trade unions

To what extent do you agree that the Plan enables us to fulfil our duties?

Strongly agree / Agree / Disagree / Strongly disagree.

The duties set out in the Act create a strong foundation for Medr and are, for the most part, reflected across Medr's aims and ambitions. In particular, the emphasis on participation, learner outcomes, and research and innovation within the strategic aims directly addresses a range of duties.

As set out below, there are many specific commitments that we think provide a good basis for Medr to fulfil its duties.

However, the fundamental role of internationalisation within Wales' tertiary education and research sector is not as fully explored or promoted within the draft plan as it could be.

Are there any duties that are under-represented in the Plan?

Yes / No. Please provide details.

Internationalisation is a cornerstone of Wales' tertiary education system, playing a crucial role in enhancing the quality and reputation of Welsh institutions. By fostering global connections, Welsh universities can attract top talent, engage in cutting-edge research, and offer students a truly international learning experience. It is vital to our reputation, global standing, and economic growth.

We welcome recognition within the draft strategic plan of the role of student and staff mobilities, recruitment of international researchers, encouraging participation in international research partnerships, and international quality frameworks.

However, this approach does not provide a proportionate emphasis on the fundamental role of institutions' international activities, and neglects the immense contribution of international students and staff to campuses and communities. Universities Wales and ChUW would therefore suggest that an additional strategic aim could be developed, focused on delivery the strategic duty to promote a global outlook.

The legislation sets out that promoting a global outlook includes the creation of opportunities for the benefits gained from international education to be used for economic, social, environmental or cultural well-being of Wales, and fostering collaboration between providers in Wales and elsewhere in the world, among others.

A dedicated strategic aim addressing this would put more emphasis within the draft strategic plan on this vital component of our tertiary education and research system. Elsewhere within this consultation response we have highlighted elements that could be addressed or further expanded upon within this new strategic aim.

2. Our Plan needs to respond to the [statement of strategic priorities for tertiary education and research and innovation](#) issued to us by the Welsh Government. The five priorities are:

1. Develop a tertiary system that prepares learners for a dynamic and changing economy where all can acquire the skills and knowledge they need to succeed in life and work.
2. Maintain and enhance the quality of the tertiary system, continue and intensify work on widening participation and take steps to ensure a more equitable and excellent system for all.
3. Putting the learner at the heart of the system by focusing on the experience of learners in the tertiary system and their wellbeing.
4. Ensure that the tertiary education system contributes to the economy and society.
5. Establish the Commission for Tertiary Education and Research as a highly effective organisation providing stability and leadership during this time of transition.

Does the Plan sufficiently address all of these priorities?

Yes / No / Partially.

If no or partially, please provide details of how could it better respond to them.

The draft plan makes clear commitments across the majority of priorities set out by Welsh Government including preparing learners for a changing economy, enhancing quality, improving participation, and putting the learner at the heart of the system. Universities make a significant contribution to the economy and society, with every £1 of investment in Welsh universities generating £13 of economic impact. However, the international work that institutions undertake is a

core and fundamental part of that contribution to economy and society. Recent analysis by London Economics shows that education exports by Welsh universities deliver £1.2bn of economic impact¹. But beyond the economic impact, international staff and students make a valuable contribution to communities in Wales, sharing their own culture and experiences with our communities while building strong, lifelong connections to Wales.

For the draft strategic plan to adequately address priority 4 – ensuring the tertiary education system contributes to the economy and society – it must better reflect the role of internationalisation within our tertiary education system.

3. Does the Plan take account of the need to:

- **eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the [Equality Act 2010](#);**

Yes / No / Partially. Please provide details.

Eliminating discrimination, harassment and victimisation has been an important and long-standing area of work for universities. Whether through the research work undertaken by universities which helps shape the development of public policy or the actions universities themselves undertake.

Recently universities have undertaken a range of work including a sector wide commitment to work towards achieving the Race Equality Charter and publishing a joint statement to confirm that non-disclosure agreements will not be used in cases of sexual misconduct or harassment. On a sector level, we have contributed to the development of important pieces of work such as *Tackling racial harassment in higher education*², *Changing the culture: tackling staff-to-student sexual misconduct*³ and *How to handle alleged student misconduct*⁴.

Welsh universities are also adherents to the Welsh Government's Code of Practice for Ethical Employment in Supply Chains⁵.

The approach set out by Medr in the strategic plan provides opportunities to build upon this work, not least through the proposed registration condition

¹ <https://uniswales.ac.uk/welsh-universities-boost-growth-and-productivity-across-uk>

² [Tackling racial harassment in higher education: progress since 2020](#)

³ [staff-to-student-misconduct-strategic-guide-02-03-22.pdf](#)

⁴ [How to handle alleged student misconduct: case studies](#)

⁵ <https://www.gov.wales/sites/default/files/publications/2019-09/code-of-practice-ethical-employment-in-supply-chains.pdf>

for well-being. Universities look forward to continuing to work with Medr and other partners on these important areas of work.

- **advance equality of opportunity between persons who share a protected characteristic⁶ and persons who do not share it;**

Yes / No / Partially. Please provide details.

Universities Wales and ChUW believe all people should have the opportunity to access higher education and be supported to overcome challenges when they do so.

The commitments set out in the strategic plan, including the commitment to ‘create regulatory conditions that reflect the need to promote equality of opportunity’, would help advance equality of opportunity. As not all providers will be subject to regulatory conditions, Medr may wish to consider what other actions could extend this work across the breadth of tertiary.

The focus on increasing participation, improving outcomes and supporting better transitions will all, similarly, make a contribution to advancing this aim. Given the participation challenges faced in Wales, this is a crucial area of work.

There is an opportunity to use the commitments around learner voice and engagement to further strengthen Medr’s work in this area and better understand the barriers faced by those with protected characteristics.

The success of these efforts will depend, in part, on the detail as plans are further developed. When doing so, Universities Wales would recommend consultation with partners to leverage the expertise and experience of providers and wider stakeholders.

Finally, advice and guidance plays an underpinning role in equality of opportunity as people may not be aware of the opportunities available to them, or what opportunities would best serve them. The narrative on strategic aim 2 notes the intention, as a growth commitment, to work with providers to support advice and guidance. It may be worth clarifying this as a growth commitment in its own right.

- **foster good relations between persons who share a protected characteristic and persons who do not share it:**

⁶Protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

Yes / No / Partially. Please provide details.

- reduce the inequalities of outcome which result from socio-economic disadvantage⁷?

Yes / No / Partially. Please provide details.

Many factors influence inequalities of outcome for those from backgrounds of socio-economic disadvantage. Universities have a substantial history of supporting students to close the attainment gap with evidence showing that disadvantaged students tend to perform better, relative to their peers, once they enter university⁸.

However, the gap does not close completely and evidence shows that the biggest factor in tertiary education outcome is school attainment⁹. To deliver upon the ambition set out in this question, where possible there would be a benefit to Medr engaging with the pre-16 education system.

As above, commitments to introduce a condition on well-being, support better advice and guidance, and strengthen learner engagement can all play a role in reducing inequalities of outcome.

4. Will the Plan contribute to the achievement of the national [well-being goals](#) set out in the Well-being of Future Generations Act 2015?

Yes / No / Partially. Please provide details.

Universities have a fundamental role to play across the achievement of the well-being goals. The work universities undertake generate significant economic returns supporting a more prosperous Wales, the education and research they deliver improves equality, while the work they undertake with the public sector helps build a healthier and more resilient Wales.

The emphasis in the draft plan on participation and research and innovation, through clear strategic aims, will help strengthen universities' contributions to the goals. Similarly, the commitment in the plan to reduce bureaucracy will help

⁷ Socio-economic disadvantage is defined as: 'living in less favourable social and economic circumstances than others in the same society'. Experiencing socio-economic disadvantage may include some or all of the following:

- living in a deprived area;
- having little or no savings;
- having little or no income; and/or
- experiencing material deprivation (that is, lacking the things which most people would say are needed for an acceptable standard of living – such as the ability to replace worn-out furniture or to afford adequate heating).

⁸ <https://www.officeforstudents.org.uk/annual-review-2020/supporting-all-students-to-succeed/>

⁹ <https://www.suttontrust.com/wp-content/uploads/2023/10/25-Years-of-University-Access.pdf>

further maximise the sector's contribution to the goals.

However, the role of internationalisation in meeting the well-being goals is arguably not reflected in the draft plan so far. The vital economic benefit drawn from international partnerships and education, developing our skilled workforce and enhancing our vibrant culture are all elements that could be expanded upon within the draft strategic plan and would contribute to meeting the well-being goals. Crucially, this would include in supporting the goal of a globally responsible Wales through building stronger international relationships.

5. Are the aims and commitments in the Plan in accordance with the [sustainable development principle](#)?

Yes / No / Partially. Please provide details.

The sustainable development principle: the public body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

The Plan would appear to be in accordance with the sustainable development principle, in that it is focused on achieving the needs of current and future generations to access the skills and qualifications that can unlock their potential and drive economic growth.

6. In drafting this Plan, we have taken into account a wide range of evidence from published reports and statistics, including the Welsh Government's 'Our National Mission – high standards and aspirations for all', 'Cymraeg 2050 – a million Welsh speakers' and the Wellbeing of Future Generations Commissioner's strategy for 2023-2050: 'Cymru Can'.

Is there any additional evidence we need to reflect in the Plan?

Yes / No. Please provide details.

In addressing the areas in need of development within the draft strategic plan, Universities Wales would recommend Medr refer to the following:

- [Economic impact of Welsh universities, London Economics](#)
- [Opportunity, growth and partnership: a blueprint for change from the UK's universities \(universitiesuk.ac.uk\)](#)
- [UK Higher Education Financial Sustainability Report \(universitiesuk.ac.uk\)](#)
- [Collaboration for Future Skills - National Centre for Universities & Business \(ncub.co.uk\)](#)

7. Do you foresee any unintended consequences or negative impacts resulting from the Plan?

Yes / No. Please provide details.

For the most part, Universities Wales and ChUW believe the plan sets out a broad and coherent vision for supporting continuous improvement, increasing collaboration and delivering better outcomes for learners. We also welcome the recognition of the importance of diversity within the tertiary sector.

However, a great deal of the plan's impact will depend on the specific decisions taken to implement the various commitments set out within the plan. The plan commits to a focus on minimising burden and bureaucracy, ensuring this remains a focus for Medr will be important at a time where additional burden could have significantly negative consequences for the sector and its ability to contribute to the Welsh society and economy.

One way to minimise this risk is to ensure involvement of partners in the development of policy. Universities Wales and ChUW believe that to create a collaborative environment where trust can be built across the tertiary sector, there should be further consultation on the development of the operational activity that will underpin this plan.

More specifically, the lack of a single, coherent aim to address the global outlook duty does present a potential unintended consequence or negative impact. International education has a social and economic importance to Wales, whether it is the contribution of international education as a valuable export and vital income stream, or the need to preserve and develop international education and research partnerships, including opportunities for student and staff mobilities to strengthen our skilled workforce and research and innovation sector.

We would like to see this addressed through the creation of a new strategic aim on delivering a global outlook.

Part Two: Aims, Priorities and Opportunities

- 8. Medr's vision states that we will work in close collaboration with our partners to enable a tertiary education and research system which is centred around the needs of learners, society and the economy with excellence, equality and engagement at its heart.**

Do the strategic aims in the Plan enable us to deliver on our vision?

Yes / No / Partially.

In addressing each element of the vision in turn:

Work in close collaboration

The tertiary education sector is diverse, with providers of distinct missions. This diversity can be leveraged as a strength – the Wales Innovation Network shows the value of drawing on collective diversity – but requires close collaboration and the building of a trusted environment. We welcome the foundation aim noting the importance of respecting diversity and we are pleased to see efforts to collaborate with the sector reflected throughout the plan, including the commitment to consult on areas such as the regulatory approach and funding model.

However, as set out earlier, Universities Wales would welcome a commitment to consult on the detail of the proposed operational plans and, in doing so, foster a collaborative, trusted space between stakeholders and Medr.

Centred around the needs of learners

Universities Wales welcomes the consistent emphasis throughout the plan on the needs of learners including on well-being, the importance of coherent pathways and flexible provision (including part-time), and the proposed well-being framework. A significant amount of activity has been undertaken by universities to support mental health and well-being including adherence to the *Step Change Mentally Healthy Framework* and implementation of the Papyrus Suicide-Safer guidance. Universities Wales recommends reflecting this existing work in the development of the framework, to avoid duplication and to avoid any risk of unravelling existing activity that is currently supporting well-being.

Universities Wales notes the role and function of NUS Wales as the democratically elected voice for most further and higher education institutions in Wales and would advocate for the Learner Voice Forum being delivered in a way that bolsters democratic and representative learner voice.

Centred around the needs of society and the economy

Wales faces significant challenges through an ageing population, workplace disruption, shifting occupation patterns and the impact of global challenges such as climate change. Wales will need more people of all ages and backgrounds to move up the skills ladder. It is estimated that [more than 400,000 extra graduates will be needed in Wales by 2035](#) in order to respond to skills gaps, with 95% of new jobs being at graduate level.

The ambition set out in the draft plan to improve pathways and transitions will be essential to this, along with wider commitments on flexibility and improving participation.

Another key feature of focusing on the needs of society and the economy will be the work Medr undertakes around research and innovation. The strategic aim focused on research and innovation helps ensure a prominent role for this work. As explored elsewhere in this response, there are positive steps Medr can

undertake to strengthen our research and innovation sector and increase the volume and scale of research and innovation in Wales.

Excellence

Strategic Aim 3 sets out commitments that will enable Medr to deliver upon its vision to have excellence at its heart by ensuring excellent standards, determining quality assessment arrangements and focusing on continuous improvement.

Baseline standards in higher education have repeatedly been tested and found to be sound and benefit from a tangential relationship to the European Standards and Guidelines (ESG) which helps to guarantee the continued use of cyclical review and student representation in quality arrangements amongst other things. Welsh universities have consistently expressed support for an increased focus on quality enhancement.

One of the strengths of historic UK higher education is shared infrastructure on areas including quality and data. This shared infrastructure has helped provide efficiencies of scale and also build the UK's international reputation. In recent years, England has increasingly diverged from the rest of the UK. As a new regulator, there are opportunities for Medr to influence the direction of other UK regulators to help to safeguard the international reputation of UK higher education.

Equality

The draft plan sets out a range of actions to support equality including through the use of the regulatory system and the commitment to place a greater emphasis on student outcomes (supported by developing the use of data across the whole of the tertiary sector).

Engagement

The Learner Voice forum is a tangible means for Medr to engage with learners on their needs, and the various committees/councils of Medr should ensure sufficient engagement with sector bodies and providers. However, where appropriate, other methods should be deployed to reach certain groups of learners who may not be represented through the Learner Voice Forum membership.

Universities Wales and the higher education sector enjoyed a positive and collaborative working relationship with HEFCW via regular meetings with the Universities Wales Learning and Teaching Network, membership of QAC and SOAC as well as numerous informal routes and would be keen to ensure this continues under Medr.

If no or partially, please provide details of how the Plan could better enable us to deliver on our vision. In your response, please consider the role your organisation would play in the realisation of our aims.

We would like to suggest that the vision could be amended to include direct reference to a global outlook, for example:

*'We will work in close collaboration with our partners to enable a tertiary education and research system **with a global outlook** which is centred around the needs of learners, society and the economy with excellence, equality and engagement at its heart.'*

Universities Wales and ChUW's roles are representative by nature, and we will continue to work positively with Medr to represent our respective interests, while also working collaboratively with sector bodies and stakeholders.

Universities Wales and ChUW are keen to engage with Medr in a formal consultation process around the development of its operational plans to build trust and confidence across the sector.

9. Within each of the strategic aims in the Plan, there are founding commitments to be achieved within the first two years, and growth commitments to be developed over five years.

Considering each of the strategic aims, are the founding and growth commitments correct?

Yes / No / Partially. Please provide details.

Strategic Aim 1 – Focusing the sector around learner needs and encouraging participation at every life stage

Founding commitments

- Establish a learner engagement code and a learner voice forum
- Develop a framework for mental health and well-being and guidance around learner protection plans
- Set out regulatory conditions that promote equality of opportunity and reduce gaps in attainment

Growth commitments

- Create an environment that increases participation, particularly from traditionally under-represented groups
- Provide for a safe and inclusive learning environment
- Promote opportunities for learning, from pre-16 transition to all-age learning

The commitments set out a balance between the statutory obligations and wider ambitions to deliver change within the tertiary environment.

In particular, we welcome the focus on participation given the scale of the challenge facing the sector and the implications that that challenge has for people and places in Wales. The gap between the higher education participation rate in Wales compared to the rest of the UK is the widest it's ever been. As set out earlier in this response, to deliver a sea change in skills delivery necessitated by occupational shifts, we will need to move more people in Wales up the skills ladder including through different modes of study including part-time and flexible provision.

Medr may want to consider setting a target to bring Welsh higher education participation into line with the current UK average of around 36% with a stretch target of 40% to account for improvements elsewhere over time. Work will also be required to address the participation gap between the most and least advantaged students from Wales which has increased, bucking the UK-wide trend. There are also challenges to be met around the loss of mature applicants who often access courses such as Nursing and Social Care helping to provide a fit workforce for NHS Wales and similar public services.

The Plan states 'We will work with partners to encourage well-being, raise the aspirational thinking of our learners and support successful transition into, or development in the world of work' – we welcome the intention to seek to raise aspirational thinking and acknowledgement that this must be done in partnership. Universities Wales and ChUW are keen to work with Medr and other partners to tackle this challenge. We would welcome the development of plans within the implementation phase to engage with schools to tackle low participation, and to provide comprehensive advice and guidance to school pupils about options available to them across the tertiary sector.

As the commitments set out in the plan are further developed, there are opportunities to ensure that the commitments fully deliver on the ambitions set out in the plan. For example, the proposed mental health framework would be strengthened by reflecting the frameworks already in place at Welsh universities which cover suicide prevention policies and a whole-institution approach to mental health. Universities have developed processes and services in line with frameworks developed in recent years. Diverging from these approaches would risk duplication or, more concerning, negatively impacting existing interventions.

Strategic Aim 2 – Creating a coherent system that develops skills that benefit a changing economy and society

Founding commitments

- Build links with industry, ascertain skills gaps, influence the skills system and deploy funding to meet need

- Develop Welsh apprenticeship provision, ensuring rigorous standards of occupational competence
- Promote civic mission, encouraging learners and providers to be engaged members of their communities

Growth commitments

- Foster collaboration to create coherent learning pathways that contribute to a sustainable economy
- Encourage flexibility to allow learners to adapt their skills to a changing environment throughout their lives
- Review basic skills provision

Given the scale of the challenge facing Wales as a result of the shifting nature of the economy and the anticipated increase in demand for higher level skills set out earlier in this response, it will be crucial that Medr is able to deliver on the strategic aim of developing skills that benefit the economy and society.

At the heart of this is the commitment to developing learner pathways. A key opportunity of a joined-up tertiary education and research sector should be the chance to facilitate a broader range of learner pathways, including part-time provision and opportunities for lifelong learning, that minimise the risk of learners ending up in a qualifications 'cul-de-sac' where they must take a step back before they are able to progress.

It is important that the work that develops as a result of these commitments also recognises the breadth of skills delivery in Wales and the diversity of providers. Universities are established skills providers, delivering over 300,000 days of continuing professional development every year¹⁰, a range of degree apprenticeships, and subjects with a distinct vocational focus including nursing, policing, engineering, social work, and teaching.

Learner pathways must also be supported with an increased focus on the role of advice and guidance. This is reflected in the narrative of the strategic plan but, potentially, is an area of sufficient importance that it could form a commitment in its own right.

Feedback from industry and providers, especially in light of the establishment of Skills England, indicates that there should be a managed expansion of apprenticeship pathways. Currently almost eight out of ten learners who undertake apprenticeships at levels 2 and 3 do not have a work-based learning route through to degree level. Approximately nine out of ten learners on higher level apprenticeships (L4-5) do not have a degree apprenticeship (L6) top-up option.¹¹

¹⁰ <https://www.hesa.ac.uk/data-and-analysis/business-community/services#cpd>

¹¹ [Learning programmes for Foundation Apprenticeships, Apprenticeships and Higher Apprenticeships \(gov.wales\)](#) provides details of pathways available in 2022/23.

As well as degree apprenticeships, universities in Wales have expertise in delivering work-aligned skills-based qualifications such as Foundation Degrees, HNDs and HNCs. These qualifications are highly valued by industry and are often undertaken by mature learners through a part-time route in order that they can continue in the workplace while upskilling.

Strategic Aim 3 – Ensuring excellent standards and high aspirations that allow learners to achieve their ambitions

Founding commitments

- Determine quality assessment arrangements recognising diversity and prioritising excellent standards
- Consult upon ambitious performance indicators to drive continuous improvement

Growth commitments

- Provide clarity around excellent standards, recognising that measurements of success vary in each part of the sector
- Develop funding methods which can influence continuous improvement
- Analyse outcomes to ensure learning has a positive effect on learners, the economy and society

The robust strength of the quality approach to higher education in Wales has received international recognition. Universities Wales and ChUW note that Medr will consult formally on the development of the quality assessment arrangements and funding methods, and will seek to engage proactively on this. Universities Wales has long advocated for enhancement to be a central tenet of quality processes and would support this approach alongside a light touch risk based assessment of baseline assurance, with quality enhancement providing the means of supporting continuous improvement. We would also strongly advocate for any method going forward to be in line with the European Standards and Guidelines. In the development of the commitments set out under this aim, we would advocate a proactive effort to work with other UK regulators to attempt to secure a collective approach where doing so is beneficial to Wales.

We would note a distinction on the usage of language within the aim. In higher education, academic standards and quality are distinct. The drafting of the aim may benefit from also making reference to quality.

We welcome the reference within the plan to developing systems to interrogate data. There is extensive data captured within the higher education sector, however the join-up with other parts of the sector is fragmented and shared data infrastructure could be hugely beneficial in informing policy. Many of the

ambitions set out within this strategic plan will require reliable and timely data to inform decision making.

Strategic Aim 4 – Growing internationally acclaimed research and inspiring innovation throughout the sector

Founding commitments

- Attract and retain the best researchers from across the world; support a more diverse and inclusive environment
- Work with relevant bodies to grow Wales' research base by supporting providers to secure available funding
- Identify ways in which the impact of research can be measured

Growth commitments

- Encourage research and innovation activity that benefits Wales and work with providers to disseminate results
- Promote a culture of innovation and knowledge exchange; encourage collaboration with industry and government
- Promote opportunities for new Welsh businesses that are established as a result of knowledge generated in Wales

University research and innovation is of fundamental importance to the Welsh economy, benefitting the people and places of Wales and beyond. Research can unlock the ongoing productivity problem by creating jobs and upskilling the nation, while also driving forward progress towards net zero, and delivering upon the Welsh Government's Innovation Strategy.

There is an opportunity for Medr to help build the reputation and competitiveness of Wales, in doing so making Wales a more attractive destination for business and investment. Our ambition for research and Wales should be an integrated system that is not just competitive within the UK environment but also internationally.

The work undertaken by our universities makes a tangible difference to people's lives. In the most recent Research Excellence Framework, Welsh universities led the UK for proportion of research whose **impact** is considered internationally excellent or world-leading.

Recent analysis of the research submitted for the 2021 assessment concluded that Welsh universities are actively reshaping every part of society for the better. A key finding was that 'Impact in Wales' is the predominant outcome of Welsh research: 70% of the identified impact had an impact in Wales. Rooted in Wales, the benefits of research being undertaken at Welsh universities are felt worldwide. Welsh universities benefitted in particular 25 different types of groups of people and organisations, highlighting in particular children and young people,

policy-makers and local communities, the elderly, women and people with disabilities.¹²

Some of the characteristics of the research submitted by Welsh universities included, for instance:¹³

- 94% of the Welsh university case studies involved collaboration with non-academic partners including public sector bodies, national and local government, and industrial partners in particular.
- Over half of the research reported informed policy or governance, and 42% had an economic impact.

The challenge facing the sector is that core funding has stagnated in real-terms, and project-based funding does not provide for full cost recovery. In order to remain sustainable, and to meet the ambition for increased scale, support is required.

Universities Wales and ChUW welcome the commitment to growing the scale and excellence of research base in Wales. As identified by Professor Graeme Reid's *Strength in Diversity*, scale and volume are two of the key challenges for research and innovation in Wales¹⁴; challenges underpinned by the relatively low levels of core research support in Wales.

The commitment to working with relevant bodies is welcomed. Universities Wales and ChUW would like to see Medr develop a strong relationship with UKRI in order to ensure that the role of place is adequately reflected in the development of funding competitions and to advocate for Wales in helping to shape UKRI priorities.

The Welsh university sector also has extensive experience of delivering regional investment and innovation funds, delivering local impact, regional infrastructure and collaborating with businesses.¹⁵ This work was previously supported through EU Structural Funds. Medr's role as an advocate for Welsh research and innovation will be crucial as the funding environment for type of activity continues to evolve on a Wales and UK-wide level.

We also strongly support the encouragement towards participation in national, European and international research programmes. This is vital to ensure that Welsh universities can stay at the cutting edge of research and participate in the global research and innovation ecosystem. There is a role for Medr in building close working relationships with European research agencies. It is important that

¹² The Learned Society of Wales, Making an Impact, A Celebration of Welsh Research, 9 Nov 2023 ([here](#))

¹³ The Learned Society of Wales, The Impacts of Research from Welsh Universities, 9 Nov 2023 ([here](#))

¹⁴ <https://uniswales.ac.uk/sites/default/files/2021-09/Strength-in-Diversity-Professor-Graeme-Reid-FINAL.pdf>

¹⁵ [ETRA Committee consultation on post-EU regional development funding - Universities Wales response.pdf](#)

Medr takes an outward looking approach in relation to research and innovation, more generally.

The Wales Innovation Network, a programme of Universities Wales, was formed by Welsh universities to support collaboration and to build networks, leveraging diverse strengths to secure increased investment into Wales. WIN can continue to work productively with Medr and with Welsh Government in promoting opportunities for collaboration across the sector.

In terms identifying means of measuring of impact, Universities Wales would suggest drawing on established approaches such as future Research Excellence Framework exercises.

Universities Wales and ChUW note the commitment to encourage research and innovation activities ‘that have potential for positive impact on the economic, social and cultural life of Wales’ but it is important to recognise the role of basic or discovery-led research and the limitations on being able to adequately identify which research activities would then subsequently have a positive impact on the economy or society.

The [delivery plan for the Welsh Government innovation strategy](#) said (then) CTER would develop its own plan for implementation of the Welsh Government innovation strategy by Q2 2024. While it is understandable that this has not yet been feasible to deliver, it could be worth Medr incorporating its plans for delivering upon the innovation strategy into its strategic plan.

Strategic Aim 5 – Encouraging greater use of the Welsh language

Founding commitments

- Develop a Welsh Language Strategy to ensure Medr is a bilingual workplace
- Develop a national plan that increases opportunities for Welsh language learning and assessment

Growth commitments

- Work collaboratively to support progress of our national strategy for the provision of the Welsh language
- Promote the benefits of learning the Welsh language to encourage people to develop their skills
- Work with the Coleg Cymraeg Cenedlaethol to design policies that enhance Welsh-medium provision

We welcome Medr’s commitment to the Welsh language and plans to develop strategies to bolster opportunities for learning through the medium of Welsh.

10. What are the key priorities for current and future learners in the tertiary education and research sector in Wales?

Are these sufficiently reflected in the Plan?

Yes / No / Partially. Please provide details.

In your response, please consider whether the Plan sufficiently balances these priorities alongside the other duties (as outlined in part one) placed on us.

Based on the experiences of university staff in student-facing roles, and feedback from NUS Cymru, we understand priorities for current and future learners include:

- having the flexibility of options and access to education that meets needs with clarity on pathways and opportunities, including high quality advice and guidance
- Addressing ongoing challenges relating to well-being and mental health (including the broader issues around cost of living)
- Support on destinations ('next steps')

We believe that many of these areas are addressed through the commitments set out in the plan including the focus on continuous improvement, developing pathways, utilising data to understand key issues such as participation and destination, and through the development of the mental health and well-being framework.

Universities Wales and ChUW support the plan's emphasis on learner engagement and ensuring that learner engagement continues to inform the work of Medr.

11. What are the key priorities for tertiary education providers in Wales in the next five years?

Are these sufficiently reflected in the Plan?

Yes / No / Partially. Please provide details.

In your response, please consider whether the Plan sufficiently balances these priorities alongside the other duties (as outlined in part one) placed on us.

Any consideration of the key priorities for the next five years must reflect the environment we find ourselves in. Welsh universities face some of the most profound challenges in modern history, driven by increasing costs, the real-terms erosion of income and volatility driven by the international recruitment environment.

However, within this difficult environment, universities remain focused on delivering high quality education that meets the needs of people, society and the

economy alongside research and innovation which drives new discoveries, shifts business behaviour and improves people's lives.

To address the sustainability challenge, a priority for universities will be undertaking changes to their operating models while balancing the needs of staff and learners and the importance of delivering their core functions.

Beyond this, other key priorities include:

- **Participation** and creating a positive reason for studying higher education in Wales is a core priority. Wales is experiencing some of the most alarming participation challenges we've seen in many years. We are now seeing clear, consistent and real warning signs that fewer people from Wales are entering higher education (in either Wales or other parts of the UK). This issue applies to both 18-year-olds (where Wales is one of the worst areas of the UK for take-up) and the mature market which has seen numbers fall in the last few years. According to recent UCAS data, the issue is particularly exacerbated in the most disadvantaged areas of Wales. This challenge poses a considerable risk to Wales' future prosperity given the economic and workplace shifts anticipated over the next ten year period.
- **Contributing to economic growth** - Universities take seriously their critical role to Wales' future economic and social prosperity. Rooted in communities in Wales, our universities have an economic impact of £11 bn. They support the foundational economy, build supply chains and generate and sustain new businesses.

Universities' learning and teaching and research and innovation activity contributes [£11bn to the Welsh economy every year](#), providing a £13 return on investment for every £1 of public funding.

- **International education and research** continue to be fundamental to the success and reputation of Welsh universities. Internationalisation in universities encompasses a wide range of activities and benefits, including collaborating in research, hosting international students, delivering programmes overseas through transnational education, and providing international experiences for domestic students. Sustainable and diversified growth of international income streams to Welsh universities will be a particular priority going forward. As set out above, we do not feel that this has been sufficiently addressed in the strategic plan so far, and would advocate for the addition of a strategic plan focused on internationalisation in order to address this high priority for the sector.
- **Learner wellbeing and success** – increasing numbers of students are arriving at university having declared a mental health condition. Universities continue to develop their support for student wellbeing, in order to support them to succeed academically. It is positive to see Medr including learner needs and engagement within the draft strategic plan.

12. What are the biggest opportunities of having a single body responsible for oversight of the whole tertiary sector?

In your response, please consider whether the Plan enables us to make the most of these opportunities, or how we could do this better.

- The creation of a single regulator and funder for tertiary education and research offers an opportunity to drive up participation, improve outcomes, strengthen pathways and transitions, and build upon the international excellence and reputation of Welsh education. There is also an opportunity to maintain a focus on the importance of differentiation and collaboration across the tertiary sector.
- This opportunity comes at a crucial time where we face significant occupational shifts and disruption, large-scale socio-economic challenges and an uncertain global environment. Medr has the potential to draw together the diverse strengths of tertiary education providers in Wales and leverage them to deliver higher participation across all modes of study, economic growth, and improvements to the lives of people in Wales.
- A specific opportunity that can be realised will be the benefits of improved, joined-up and readily available data, to inform policy making, enhance the sector's ability to adapt to changing trends, and jointly address the decline in participation in post-16 education.
- A further key opportunity for Medr is to implement a regulatory framework that is not unnecessarily cumbersome for providers. Indications within the plan of an ambition to lighten the administrative burden of regulatory is welcome. Good communication with the sector and partners such as HEIW will be vital in ensuring providers are not required to duplicate monitoring. Strategic Aim 1 sets out Medr's commitment to establishing a risk-based regulatory framework, which is welcome. Universities Wales is keen to work with Medr as this area develops and will engage fully with consultations and the development of operational plans.
- The creation of Medr's Committee for Research should provide a counterpart to Research England and raise the profile of higher education research in Wales. Strategic Aim 4 outlines commitments relating to research and innovation which are welcome.

13. Medr has a duty to promote collaboration throughout the tertiary education and research sector.

To what extent does the Plan enable us to make the most of opportunities to collaborate?

Fully / Moderately / Slightly / Not at all. Please provide details.

The way in which the sector is able to collaborate will, in part, be driven by effective working relationships between Medr and different sector stakeholders. We welcome ambitions to create a culture of trust and collaboration that can support further partnerships between providers across the tertiary sector. We also support the aims of the proposed learner engagement code to support partnership with learners.

Medr will need to be mindful of the constraints placed on higher education providers as a result of competition law and CMA guidance, including limits on agreements to 'divide up' markets and restrictions on sharing information that could lead to 'anti competitive' behaviour.

As set out elsewhere in the response, we would welcome clarity on how Medr will engage and collaborate with partners in the development of operational plans.

14. We need to be ambitious about what we can achieve. However, the financial environment we are working in is challenging. We also recognise the establishment of Medr is a significant change for the sector and we are committed to ensuring a smooth transition.

Considering the context we are working in, to what extent is the level of ambition in the Plan suitable?

Fully / Moderately / Slightly / Not at all. Please provide details.

Universities Wales welcomes many of the ambitions set out in the plan including around increasing participation, supporting more coherent pathways and increasing the scale of research and innovation in Wales. It is right that, even in the constrained financial environment, as a tertiary sector we maintain a focus on continuing to improve and deliver further benefits to people and places in Wales.

However, we would suggest that the draft plan in its current form is not sufficiently ambitious in terms of internationalisation and the crucial role this plays in developing a tertiary education system that is both outward looking and financially sustainable. Internationalisation should not be seen as a bolt on but one of the fundamental contribution – one that is social, cultural and economic – that tertiary providers are able to provide to communities in Wales.

Part Three: Our Ambitions

15. Please consider the ambitions on page 4 of the Plan.

a) To what extent do you agree with our long-term ambitions for success?

Long-term ambitions:

- Improved coherence of learning pathways and more flexible learning
- Better learner outcomes and improved learner experiences
- Reduced inequalities and removal of barriers to learning
- Greater focus on learner engagement and well-being
- Greater alignment of knowledge, skills and understanding with the economic, community, cultural and environmental needs of Wales
- Growth in the excellence and impact of research and innovation in Wales
- More learning in Welsh

- | |
|---|
| <ul style="list-style-type: none">• Increased participation in tertiary education |
|---|

Fully / Moderately / Slightly / Not at all. Please provide details.

Universities Wales agrees with all of the above as long-term ambitions for Medr. We would recommend a further long-term ambition focused on increasing excellence and boosting Wales' standing in the global education and research sector through delivering high quality international education and partnership opportunities.

b) What changes are required in the sector to achieve these long-term ambitions? Please provide details and examples.

- Improved coherence of learning pathways and more flexible learning
 - As set out elsewhere, a regulatory and funding framework that is sufficiently agile and not too bureaucratic or onerous, will allow the sector to respond flexibly to learner needs, develop pathways including part-time provision and lifelong learning and interact helpfully with industry to provide skills training as needed
 - The expansion of the degree apprenticeship frameworks available in Wales would improve the coherence of learner pathways.
- Better learner outcomes and improved learner experiences
 - Universities are compliant with the UK Quality Code for Higher Education and the European Standards and Guidelines to ensure that students receive a high-quality educational experience that makes an internationally recognised example of good practice where student engagement with learning is involved. Universities are also committed to continuous improvement through their work on enhancement. Continued adherence to these quality requirements provides a framework that will allow the sector to continue to improve learner outcomes and experiences.
 - Engagement with the Learner Voice Forum, NUS Cymru and with the sector via Medr councils/committees should also support the continued improvement of learner experiences and outcomes.
- Reduced inequalities and removal of barriers to learning
 - There is a need for a joined-up approach to gathering data and developing policy solutions to drive up participation in tertiary education, particularly among those from lower quintiles of WIMD.
- Greater focus on learner engagement and well-being
 - As above, engagement via the Learner Voice Forum and NUS Cymru, as well as Medr councils/committees with the sector should help to support a focus on engagement and well-being.
- Greater alignment of knowledge, skills and understanding with the economic, community, cultural and environmental needs of Wales
 - The [NCUB report on collaboration for future skills](#) contains some helpful recommendations including:

- **Improved data sharing:** Collecting and analysing data on skills gaps and trends can help inform collaborative efforts.
- **Simplified administrative processes:** Streamlining bureaucratic procedures can reduce barriers to partnership.
- **Place-based and sector-specific initiatives:** Tailoring collaboration efforts to specific regions and industries to increase their effectiveness.
- Growth in the excellence and impact of research and innovation in Wales
 - Strong engagement between Medr and UKRI will be necessary to ensure Welsh universities are well-positioned to draw investment into Wales and influence UKRI's priorities.
 - Ongoing collaboration via the Wales Innovation Network should continue to support the research and innovation sector in securing funding.
 - The plan's commitment to encouraging participation in international research programmes is positive, as this has the potential to attract global talent, secure funding and drive excellence.
- More learning in Welsh
 - The coordination of Medr's role with the National Institute for Learning Welsh, when established, will be required to support the long-term ambition of increasing opportunities for learning in Welsh
- Increased participation in tertiary education
 - A joined-up campaign across the education sector is required, with direct involvement and support from Medr and Welsh Government, to raise aspirations among Welsh-domiciled school pupils and adult learners to pursue further and higher education. Awareness of opportunities and the accessibility of college and university needs to be raised and promoted to school pupils. Careers services need to proactively encourage learners towards seeking qualifications at further and higher education institutions

c) How will we be able to measure success against these ambitions? Please provide details.

Further consultation will be needed on the development of success measures, including how best to use pre-existing data sources, but some areas worth consideration are set out below.

We would suggest measuring increased participation in tertiary education via the following metrics:

- Increased participation in higher education by Welsh-domiciled students
- Increased numbers of international students choosing Wales as a destination to pursue higher education, to match the UK average

- Diversification of the international student population in Wales, with students studying in Wales from a broader pool of home countries.
- It would be helpful to capture destinations data for the 16-25 population to monitor and understand progress from school to tertiary education and/or work (or lack thereof). Currently this is not available as a joined-up picture.

Reducing inequalities and removal of barriers to learning:

- UCAS data accounts for WIMD quintiles, so an increase in the proportion of Welsh-domiciled applicants from Qs1 and 2 to higher education, and a reduction in the gap between Q1 and Q5 participation rates, would demonstrate an improvement in reducing inequalities. UCAS can also break down participation rates by region, which demonstrates that those living in certain regions of Wales are far less likely to apply to university. Medr could see to address this and see gaps reduced.

Growth in the excellence and impact of research and innovation in Wales:

- Increased capture of funding from UKRI would demonstrate growth in impact, as every £1 spent by research councils results in £12.70 additional output.¹⁶
- Growth in the impact and excellence of R&I in Wales could also be measured by higher scores across REF.

Better learner outcomes and improved learner experiences:

- The National Student Survey provides data on learner experiences, which can be used to assess progress, aligning with the proposed Learner Voice Survey where appropriate.
- Graduate Outcomes data measures success in terms of career progression and salary, however Medr may wish to explore means of measuring outcomes more broadly.

Part Four: Welsh Language

16. Does the Plan appropriately reflect the Welsh Government's ambition to increase the number of Welsh speakers and increase the use of the Welsh language?

Yes / No / Partially. Please provide details.

The inclusion of strategic aim 5 to encourage greater use of the Welsh language reflects a positive commitment to increasing the number of Welsh speakers. It will be beneficial for Medr to work with the Institute for Learning Welsh when it is established in developing a framework for tertiary education.

17. What positive or adverse effects might the Plan have on:

- a) opportunities for persons to use the Welsh language;**
- b) treating the Welsh language no less favourably than the English language?**

¹⁶ [LE - Universities Wales - Impact of Welsh universities - Final report.pdf \(uniswales.ac.uk\)](#), p9

Strategic aim 5 should generate opportunities for people to use the Welsh language throughout the tertiary education and research sector.

18. Could the Plan be changed to increase positive effects, or decrease adverse effects on:

a) opportunities for persons to use the Welsh language?

Yes / No. Please provide details.

b) treating the Welsh language no less favourably than the English language?

Yes / No. Please provide details.

Universities Wales and ChUW would support the position of the Coleg Cymraeg Cenedlaethol in that there are opportunities for the strategic plan to be enhanced to include references to Welsh language throughout the strategic aims.