

Welsh Government consultation on Regulation of higher education providers and designation for student support

Medr's response to the Welsh Government Consultation:

<https://www.gov.wales/regulation-higher-education-providers-and-designation-student-support-html>

Consultation response issued by Medr: 3 July 2025.

Q1. Do you agree with the proposal to maintain the existing policy and only specify full-time undergraduate and PGCE courses as qualifying courses for tuition fee limits?

Agree/Disagree/Neither Agree or Disagree

Medr supports the continuation of tuition fee limits for full-time undergraduate and PGCE courses. This reflects long-standing policy objectives to widen participation and maintain affordability in key areas of national priority.

However in future, there may be a case for reviewing the scope of tuition fee regulation. The exclusion of part-time and postgraduate taught courses (beyond PGCE) may have a disproportionate impact on learners for whom full-time study is inaccessible—such as mature students, carers, disabled learners, or those in work. This may inadvertently entrench inequalities the system seeks to address.

We suggest that Welsh Government consider the potential long-term benefits of a more inclusive approach to fee regulation, balanced against provider sustainability. A commitment to reviewing this position as part of future policy development would be welcome.

Q2. Do you agree that registration with Medr should be a prerequisite for the automatic designation of Welsh higher education courses, including part-time and postgraduate, for the purpose of Welsh Government student support?

Agree/Disagree/Neither Agree or Disagree

Yes. Medr strongly supports the proposal that registration should be a condition for automatic designation. This approach appropriately aligns eligibility for publicly underwritten student support, with a provider's regulatory status and ensures that automatic designation is underpinned by robust oversight.

The registration process administered by Medr will assess and monitor institutional financial sustainability, governance, learner outcomes, and commitments to Welsh Government priorities. Medr has the statutory duty to assess, or commission the assessment of, the quality of higher education provision and the regulatory system addresses this requirement.

We believe this alignment will provide clarity and coherence for both learners and providers.

Q3. Do you agree with the proposal that the higher education courses provided by OfS-registered providers, whether registered in the Approved or the Approved (fee cap) categories, should be automatically designated for the purpose of Welsh Government student support?

Agree/Disagree/Neither Agree or Disagree

We recognise the benefits of enabling automatic designation for courses from OfS-registered providers in Approved or Approved (fee cap) categories. This approach facilitates cross-border mobility and reduces complexity and uncertainty for students studying outside Wales.

It should be noted that whilst OfS registration provides a level of assurance, it does not mirror Medr's regulatory framework in full. Differences exist in emphasis and thresholds, particularly in relation to Quality (as the OfS regulatory system is not compliant with the European Standards and Guidelines), Welsh language, or staff and student welfare. However, overall we agree that this proposal is the right one to balance student choice and regulatory burden with delivery of Welsh priorities given the numbers studying in Wales and the benefits providers in Wales gain from similar reciprocal arrangements.

Q4. Do you agree with the proposal that the higher education courses provided by accredited school-based initial teacher-training providers should be automatically designated for the purpose of Welsh Government student support?

Agree/Disagree/Neither Agree or Disagree

From a pragmatic perspective, Medr supports the automatic designation of accredited school-based ITT routes. This is consistent with the principle of parity across teacher training pathways and helps ensure that access to student support does not become a barrier to recruitment in a critical public service. Increasingly, the specific course designation processes reflect a duplication of effort for those providers in this respect.

We would like to emphasise the importance of retaining designation only for those courses which result in a PGCE qualification, not solely QTS status.

Q5. What are your views on the proposed approach to the designation, for the purpose of Welsh Government student support, of courses provided on behalf of regulated higher education providers?

Medr supports the proposed approach, which acknowledges the complexity of delivery models while ensuring that registered providers remain accountable for all designated provision made on their behalf, giving clear assurances for provision that is inherently riskier. Where franchise or sub-contracting arrangements are in place, it is essential that the lead provider maintains full responsibility for academic quality, learner outcomes, and

regulatory compliance. Medr will set clear expectations within its conditions of registration regarding oversight of partnership delivery.

We do recognise that there is a risk to existing providers who deliver courses on behalf of institutions registered in the core category, should they not seek (or have the capacity/infrastructure to apply for and maintain) registration themselves. Should those institutions move to SCD, they will lose the ability to obtain the upper tuition fee limit for their students.

Q6. Do you anticipate any resource or cost implications for your organisation arising from the proposed approach to the automatic designation of higher education courses for Welsh Government student support?

Yes/No/Unsure

The costs of moving towards the registration system have been already embedded into Medr's organisational structure.

Q7. Do you anticipate any cost savings for your organisation arising from the proposed approach to the designation of higher education courses for Welsh Government student support? (This can include immediate savings or long-term cost reductions.)

Yes/No/Unsure

Yes, in the medium to long term. Aligning course designation with provider registration enables a more streamlined, coherent approach to regulation. It reduces the need for separate course-level approval mechanisms and enables more efficient use of regulatory resource which may be re-focused on areas of greatest risk.

Q8. Do you think any of the proposals in this consultation could impact (positively or negatively) on any persons with protected characteristics covered by the general equality duty that is set out in the Equality Act 2010? If so, how could positive impacts be increased, or negative impacts be mitigated?

Yes. The proposals have the potential to improve access to student support for groups with protected characteristics, particularly where they reduce administrative barriers and simplify eligibility for student support. However, there are potential risks for those "alternative" providers in Wales who may not seek registration. Therefore, in any impact assessment, particular attention must be paid to the accessibility of sub-contracted or franchised provision, where variation in learner support could emerge.

Q9. What, in your opinion, would be the likely effects of the proposals in this consultation on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Do you think that there are opportunities to promote any positive effects?

Do you think that there are opportunities to mitigate any adverse effects?

Streamlining designation may remove unnecessary barriers for providers seeking to develop Welsh-medium courses. However, the benefits will only be realised if the approach actively encourages—and does not inadvertently deprioritise—Welsh language delivery, for example by encouraging Welsh medium students to study outside of Wales. This may be most relevant in the automatic designation of SCITTs, which could deflect from demand for existing ITT provision in Wales.

We are committed to working with Welsh Government and providers to ensure that the new system contributes meaningfully to national Welsh language objectives, including a Welsh language condition in the registration process.

Question 10: In your opinion, could the proposals in this consultation be formulated or changed so as to:

have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English, or

mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

A risk assessment on “alternative” providers who currently operate on sub-contractual arrangements with regulated institutions in Wales, and any existing Welsh language provision. Additional engagement with those providers from Medr and Welsh Government.

A risk assessment of the potential for loss of student recruitment due to the increased access to SCITT provision in England.

Question 11: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No further comments.