



Llywodraeth Cymru  
Welsh Government

**Number: WG52823**

Welsh Government  
Consultation – summary of response

## **Regulation of higher education providers in Wales**

Tertiary Education and Research (Wales) Act 2022 – Regulation of higher education providers and designation for student support Regulations

September 2025

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

## Overview

The Welsh Government recently consulted on policy proposals relating to the establishment of the register of tertiary education providers in Wales under the Tertiary Education and Research (Wales) Act 2022, and the proposed approach to the automatic designation of higher education courses for the purposes of Welsh Government student support. The consultation was live between 8 April 2025 and 4 July 2025. It attracted 30 responses, mainly from institutions and organisations predominantly based in Wales.

## Action required

This document is for information only.

## Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Link to the consultation documentation: Regulation of higher education providers and designation for student support: [Regulation education of higher providers and designation for student support | GOV.WALES](#)

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## Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

This document is also available in Welsh: [insert hyperlink](#)

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## Background

The Tertiary Education and Research (Wales) Act 2022 (“the TER Act”), an Act of Senedd Cymru, was given Royal Assent on 8 September 2022.

The TER Act provided for the establishment of the Commission for Tertiary Education and Research (now known as Medr) and the dissolution of the Higher Education Funding Council for Wales (“HEFCW”). Medr was established as a legal entity on 15 December 2022 and became operational on 1 August 2024, with HEFCW also being dissolved on that date.

Once all of its functions as provided for in the TER Act are commenced, Medr will be responsible for promoting, funding, and regulating tertiary education and research in Wales. Tertiary education encompasses post-16 education, including further and higher education, adult community learning, apprenticeships, and local authority-maintained school sixth form provision.

Part 2 of the TER Act makes provision for a register of tertiary education providers in Wales (“the register”). The register will provide the legal mechanism for regulatory oversight of registered tertiary education providers in Wales, in receipt of public funds, including grant funding from Medr and Welsh Government student support.

One of the Welsh Government’s initial policy objectives for implementation of the TER Act is to establish an effective, robust, and sustainable legislative basis for regulating tertiary education providers of higher education. These providers, whose higher education provision is primarily funded by tuition fees, cannot be regulated through Medr’s terms and conditions of funding alone, as tuition fee payments are a contractual undertaking between providers and their students.

Robust regulatory oversight of providers whose courses are designated for student support is therefore essential to protect the interests of students, the Welsh Government, and taxpayers

The register will deliver a single regulatory gateway with common baseline requirements applicable to the full range of providers of higher education in Wales including universities, further education colleges and other providers of higher education courses.

The register and associated regulatory arrangements will provide the statutory framework within which Medr will oversee the activities of registered providers. The two registration categories specified are ‘Higher Education Core’ and ‘Higher Education Alternative’. There was a separate consultation regarding these categories between October 2023 and February 2024. The summary of responses can be found [here](#).

The register is intended to be established by Medr, in respect of providers of higher education, on 31 July 2026, with the associated regulatory regime fully implemented for academic year 2027 to 2028.

During 2026 to 2027, registered providers will be regulated under the TER Act in respect of quality, financial management, governance, validation arrangements and learner focused matters such as the learner engagement code, learner protection plans and staff and student welfare. During this time tuition fee limits and matters relating to equality of opportunity will continue to be regulated through the existing regime under the Higher Education (Wales) Act 2015 (where a provider is a regulated institution).

The full implementation of the regulatory regime will see tuition fee limits and matters relating to equality of opportunity also regulated through the register from academic year 2027 to 2028 onwards.

Two primary benefits of registration for providers are the automatic designation of their higher education courses for Welsh Government student support and eligibility to receive financial support from Medr in respect of higher education and research or innovation.

Section 32 of the TER Act sets out mandatory ongoing conditions on fee limits. The section requires Medr to include a fee limit statement condition in relation to courses. Fee limits statements set the maximum amount of money that universities and colleges can charge students for certain types of qualifying courses and persons. The policy proposal is to continue to apply fee limit statements only to full-time undergraduate courses as well as postgraduate certificate of education courses.

The Welsh Government recently consulted on the policy proposals relating to fee limit statements under the Tertiary Education and Research (Wales) Act 2022, and the proposed approach to the automatic designation of higher education courses for the purposes of Welsh Government student support. The purpose of the consultation was to consider what types of courses and people should be subject to regulated course fees as well as maximum fee limits.

The consultation was live between 8 April 2025 and 4 July 2025. It attracted 30 responses, mainly from institutions and organisations and these were predominantly based in Wales.

Respondents were invited to review the consultation document and supporting information online and respond to each of the questions via e-mail, postal questionnaire or an online form. We received 8 email responses; no postal responses and 22 online forms were submitted. 5 online forms were excluded from the analysis as they were submitted without any information being provided. A further two online forms were excluded from the analysis as they were submitted in duplicate.

Not all questions were answered by all respondents.

## **Structure of the consultation**

The consultation contained 11 questions that sought feedback on policy proposals for a second tranche of regulations to be made by the Welsh Minister to support

mandatory ongoing conditions as they apply to fee limit statements as set out in section 32 of the TER Act.

The regulations that will be made in the second tranche are related to:

- Qualifying courses and qualifying persons for the purpose of regulated course fees subject to fee limits
- The maximum amount that the fee limit specified in a fee limit statement may not exceed

The questions sought stakeholders' views on the Welsh Government's proposed policy for the automatic designation of higher education courses for the purposes of Welsh Government student support. The policy is intended to utilise the opportunities presented by the creation of the register to enable a streamlined and proportionate approach to the oversight of providers, and their courses which are designated for student support and subject to fee limits.

## About the analysis

For analysis purposes, all responses were securely saved. Where agreement was indicated, respondents' details were logged along with the details from the consultation responses.

This document is intended to be a summary of the responses received. It does not aim to capture every point raised by respondents but highlights the key themes. A summary of the major themes and headlines from the responses is contained in this document and will help to shape the policy.

## Summary of responses

### Question 1

**Do you agree with the proposal to maintain the existing policy and only specify full-time undergraduate and postgraduate certificate in education courses as qualifying courses for the purpose of tuition fee limits?**

**Number of responses: 23**

Agree: 15

Disagree: 5

Neither agree nor disagree: 3

There was broad support for the proposal to maintain the existing policy for qualifying courses for the purpose of tuition fee limits. This proposal would continue to see only full-time undergraduate courses and postgraduate certificate in education (PGCE) courses as qualifying for the purpose of tuition fee limits. Respondents noted that this provides continuity of arrangements which will reduce any disruption, whilst ensuring these courses could remain affordable for students.

A respondent felt extending the fee limits to part-time and other postgraduate courses would limit flexibility needed for the design and marketing of these types of courses. Another respondent felt extending to cover part-time courses would place a disproportionate burden on institutions delivering these courses.

Those that disagreed with the proposal believed the current arrangements were not inclusive of different modes of studying which could create a widening disparity and disadvantage students from non-traditional backgrounds.

Those that neither agreed nor disagreed broadly welcomed the continuation of the arrangements.

Other comments made by respondents included:

- A respondent would welcome further consideration regarding the current part-time course fee limit cap as they felt they are no longer sustainable given current pressures.
- Another respondent would welcome a review of the policy with a focus on the long-term benefits of extending fee limit statements and automatic designations for part-time courses and other taught postgraduate courses.
- Respondents welcomed more clarity and future consideration of extension to alternative modes of study including part-time, professional, modular and blended learning. It was felt this would benefit both students and allow education to be more aligned to industry who often require level 4 plus qualifications for recruitment.
- A respondent felt the current arrangements disadvantaged students wanting to study in England either through modular studies under the Lifelong Learning Entitlement or accessing funding for accelerated learning degrees. In terms of the latter, they believed allowing this would save money in the longer-term as both maintenance and tuition fees would be less for these types of degrees.
- Another respondent felt there should be a review of PGCE courses to respond to the current recruitment crisis. They suggested alternative student support models should be considered in line with existing healthcare arrangements where students can access scholarships should they commit to working in Wales for two years post study.

## Question 2

**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?**

**Number of responses: 21**

Agree: 15

Disagree: 1

Neither agree nor disagree: 5

Most respondents agreed registration with Medr should be a prerequisite for automatic designation for the purpose of Welsh Government student support. It was

generally felt that this approach brought consistency for providers and clarity for learners with regards to what can be funded, although there were calls to ensure the process supports a diverse range of providers.

A respondent queried if the arrangements would result in an upsurge in competition within higher education provision in Wales from those without charitable status. The respondent also queried if Medr had the resources to deal with the potential increase.

Whilst not within the scope of this consultation, respondents also referred to the development of the regulatory regime by Medr, highlight the need for the regulatory requirements to be proportional and avoid duplication and that Medr balance burden and risk. Some respondents also asked Medr to provide clarity and guidance to support the process. In addition to these general points the following comments were made:

- Part-time and professional provision should be included within the framework to widen access, support lifelong learning and support diverse learners.
- Support should be given to providers transitioning to registration.
- The same measurement metrics should be used for core and alternative categories.
- Flexibility and proportionality outside the automatic registration process should remain to support providers not seeking registration.
- Partnership working should be considered when considering sub-contract arrangements.
- A register should be published setting out partnership models for each Welsh provider.

### **Question 3**

**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?**

**Number of responses: 21**

Agree: 15

Disagree: 2

Neither agree nor disagree: 4

Most respondents agreed with the proposal that higher education courses provided by OfS registered providers (Approved and Approved (fee cap)) should automatically be designated for the purpose of Welsh Government student support. The reasons included:

- Importance for Welsh further education (FE) institutions who work with English higher education (HE) providers.
- It will reduce administrative burden and regulatory effort for providers.
- Ensures cross-border consistency.



- Allows for equitable support for Welsh-domiciled students studying at English institutions.
- Provides clarity for both providers and students.

Some respondents highlighted arrangements for designation should be reciprocal and also apply to both Scottish and Northern Irish institutions that receive government funding.

A respondent believed that ongoing monitoring should be done in partnership with the Office for Students (OfS). Another respondent noted that whilst they agreed with the proposal, there were some differences between the requirements, for instance OfS does not require compliance with European standards for quality whilst Medr has indicated that these will apply to its regulatory regime.

Respondents that either provided a narrative response or neither agreed nor disagreed were broadly supportive of the proposal. A respondent recognised the alignment between the Medr categories of registration (core and alternative) and the categories used by OfS (Approved and Approved (fee cap)). Another respondent believed the proposal could have a negative impact on Welsh language goals and steps should be taken to incentivise students to stay in Wales. A third respondent felt the system must be robust enough to maintain standards where new providers (without charity status) enter the sector with particular consideration given to the impact on the student support budget. Another respondent raised concerns about the capacity to monitor institutions approved by OfS and how they support Welsh Government priorities for tertiary education.

#### **Question 4**

**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?**

#### **Number of responses: 21**

Agree: 12

Disagree: 2

Neither agree nor disagree: 7

Some respondents agreed with the proposal that courses provided by accredited school-based initial teacher-training providers should be automatically designated for the purpose of Welsh Government student support.

Respondents felt providing access to financial support would encourage a diverse and sustainable workforce particularly at a time where it is difficult to recruit teachers. It was also believed this would create parity across the different pathways to becoming a teacher, as well as streamlining processes and reducing administrative burden. It was further noted that there are currently no school-based teacher training courses in Wales, but should they be introduced it would make sense for them to be automatically registered. Respondents raised the following issues:

- Continued quality assurance for the courses is needed to maintain standards.
- Medr should take the opportunity to address disparity in Qualified Teacher Status between school sixth forms and post-compulsory FE colleges to ensure there is alignment in professional expectations, training pathways and funding eligibility.
- Specific Course Designation (SCD) requirements should be minimised for school-centred initial training delivered in partnership where there is a long-term track record of provision.
- There should be an expectation that Welsh-based providers have a minimum Welsh language standard.

Respondents that either provided a narrative response or neither agreed nor disagreed were broadly supportive of the proposal. However, respondents raised concern about the validity of new providers entering the market and the potential risk for fraud as well as the possible impact on the student support budget that needed to be considered given the current limited number of non-Welsh providers. A respondent noted the need for cross-border arrangements but believed these need to be future-proofed against a potential rise in students or courses. Another respondent believed regulatory burden could be reduced by ensuring there is no overlap with existing regulations.

## **Question 5**

**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?**

**Number of responses: 17**

There were a number of detailed responses provided to this question. Whilst there was some support for the proposed approach there were a range of comments made by respondents.

The key themes emerging from the comments are listed below.

### **Clarity**

- Some respondents felt arrangements would benefit from greater clarity as some confusion remains, for example franchisees could register and then run the course themselves.
- The exact meaning of the term 'an institution in receipt of funding from Medr' was also queried given the wide range of funding they can provide. There is particular concern that these institutions would have designated courses but Medr would have limited regulatory control over them. It was suggested the proposal should be limited to providers in receipt of recurrent grants from Medr or automatic designation limited to delivery through registered providers only.
- Clarity would also be welcomed regarding when a tertiary provider in Wales is considered 'to provide HE, or have HE provided on its behalf' for purposes of eligibility to register as required by the regulations, and how this will work, for instance, with the provisions/definitions relating to 'validation

arrangements' as defined by the 2022 Act and 'franchise arrangements' as defined in the regulations.

### **Non-charitable status**

- It was felt inconsistent that collaborative provision can be provided by non-charity providers given that they would not be eligible to apply for core registration but would be automatically designated through this proposal. It was further felt that this inconsistency created an anomaly which would allow providers to deliver on behalf of English registered providers but not Welsh registered providers.
- It was further felt that Welsh public funding will be used to support delivery through non-charitable organisations who are not required to deliver public benefit or be subject to the regulatory oversight of the Charity Commission.

### **Increased competition**

- Respondents felt there is a risk that not requiring charity status for partners to register with Medr could increase competition which could have an impact on the student budget, whilst at the same time lowering the student experience.
- There is particular concern that there will be an increase in registered English-based providers delivering through Welsh registered providers. It was also felt that arrangements could increase the number of providers seeking registration to the core category.

### **Reduction in accountability for providers**

- A respondent considered it important that where franchise or sub-contract arrangements are in place the lead provider retains overall responsibility for academic quality, learner outcomes and regulatory compliance.
- Another respondent felt that the dual-registration approach could reduce responsibility, accountancy and clarity in relation to intervention powers which could result in regulatory overreach. Medr will need to develop a formal policy for intervention.

### **Quality assurance**

- Responsible providers will be subject to cyclical quality assessment reviews. However, respondents highlighted that there needs to be clarity as to which provider has "overall responsibility for the course" as it was felt that this may be unclear.
- There is recognition that there are broad models for delivery of higher education and calls to ensure there is consistency, and the oversight framework is robust, flexible and capable of handling complex arrangements whilst still upholding high standards.

### **Duplication of regulatory requirements**

- Some respondents felt there was potential duplication for FE colleges who may be delivering mixed models of learning. Any approach must be proportionate to reflect the important role providers play in widening participation. This could be assisted with clear guidance and reduction in dual regulation.

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- Concerns were raised that this consultation and delay in final decisions was making it difficult for some providers to formulate partnerships. Those courses that rely on specific course designation are awaiting the outcome of the consultation and are unable to add courses to UCAS until a decision is made. It is suggested that there needs to be arrangements between Medr and OfS to allow Welsh students to continue to access courses that are provided in partnership.

## Question 6

**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?**

**Number of responses: 20**

Yes: 4

No: 7

Unsure: 9

Most respondents were unsure if there would be resource or cost implications for their organisations. Two respondents noted that it was difficult to answer this question without clarification of the process. Three respondents recognised longer-term cost savings related to a streamlined process but anticipated an increase in staff and senior management time would be required for initial registration. A respondent believed the costs for small providers could be disproportionate which could be mitigated by implementing a sliding scale and taking a risk-based proportional approach to registration. Another respondent felt if Medr funded Quality Assurance Agency for Higher Education (QAA) reviews this could mitigate some of the costs related to ongoing registration. A further respondent noted the increased financial burden that had been created by the requirement to provide submissions to Higher Education Statistics Agency which needed to be taken into account. Another respondent felt that whilst there would be no real costs for universities, there may be an indirect impact if there is increased provision which calls on the student support budget, which could also affect Medr's ability to regulate providers.

Those respondents that answered no to this question did so either because they felt the process would bring minimal change for their organisation or because they would not be subject to the registration regime. A respondent noted the costs had already been absorbed into their organisation. Another respondent noted that whilst there was no direct financial cost for them, a potential increased call on their services from providers would need to be considered.

A respondent that answered yes to this question anticipated increased time and staffing expenditures would be required to implement the new system but recognised it aligned with Medr's goal to streamline regulatory process. Another respondent believed there would be a substantial impact on FE colleges who might be running different models of higher education such as direct delivery and franchise or sub-contract arrangements. They believed the new system would require a significant amount of additional monitoring including creating guidance for staff. They further felt

that there would be a significant amount of duplication as FE colleges may be required to comply with multiple quality assurance regimes from both Medr and other regulators.

A further respondent answered yes to this question, however the narrative related to the cost of accelerated courses rather than costs to the institution. Similar comments were made for question 1 and have been summarised there.

## **Question 7**

**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.)**

**Number of responses: 24**

Yes: 3

No: 12

Unsure: 5

Most respondents did not anticipate any cost savings linked to this approach. The main reasons given were either because the institutions were already subject to registration or they would not be subject to the process. However, a respondent acknowledged that there could be longer-term efficiencies if automatic registration replaced bespoke applications; there was reduction in overlapping regulatory requirements from bodies across the UK; and there is clearer access to student support across a range of courses to attract learners. The respondent further clarified the saving would only actualise if there was effective implementation of the process including clear guidance, proportionate regulatory approaches, and support for institutions delivering mixed mode delivery.

A respondent who was unsure about potential cost savings acknowledged that there could be longer-term cost savings should there be a reduction in administrative tasks related to specific course designation and the streamlined regulatory process.

A respondent who answered yes to this question saw savings in the medium to longer term as automatic registration rather than course specific registration would allow resources to be diverted to concentrate on greater risk areas. Other respondents recognised the system would reduce duplication of oversight and regulatory burden.

## **Question 8**

**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?**

**Number of responses: 14**

There was a mixed response in terms of this question with some respondents believing there could be positive impacts, whilst others felt there would either be no impact or potentially a negative impact.

The most frequent concern raised was part-time courses not being eligible for automatic designation which it was felt could disadvantage students with protected characteristics, as a high proportion of part-time students come from disadvantaged groups.

It was felt that extending an automatic designation to a broader range of courses including part-time and flexible learning would have a greater positive impact on groups with protected characteristics. In addition, the following comments were made:

- The impact for specific groups of students is not clear at this point.
- Positive impacts could be increased through targeted materials designed for students with protected characteristics outlining their entitlement, the nature and potential extent of support and the arrangements for applying for and accessing student support.
- An analysis of student protected characteristics enrolled on designated courses would be useful.
- If monitoring of equality data is not part of the registration process, then it is possible some providers will not meet the same standards as expected of those required to produce fee and access or access and participation plans. If providers in Wales choose not to register, there could be a variation in learner support particularly for franchise and sub-contract arrangements. Any impact assessment should consider this.
- An extension of widening participation and outreach schemes could help make individuals aware of the support available to them.
- Consultation with the sector in shaping new plans will be important, including equality impact assessments as the proposals are implemented informed by learners and providers.
- Targeted support and guidance for providers particularly those delivering mixed models of learning.
- Ensure the system works for all learners, particularly those from underrepresented and disadvantaged groups.

## **Question 9**

**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?**

**Number of responses: 16**

Respondents largely felt there could be positive impacts on opportunities for the Welsh language but were unclear what these would be until further details of the registration system are known.

Matters identified in the responses to this question included:

- Broadening the scope of automatic registration to include other types of provision e.g. part-time could incentivise providers to offer Welsh language or bi-lingual provision where there is demand.
- Medr should ensure Welsh language expectations are clear in registration criteria. This would also promote consistency for providers.
- There should be financial incentives to develop Welsh language provision and regional collaboration. Financial and education support for students to study through Welsh would help address barriers such as low enrolment ensuring courses remain viable. This could be enhanced by providing material outlining the benefits of studying in Wales and learning through the medium of Welsh. Without incentives, there is a risk English-medium courses will dominate.
- Welsh Government should undertake a review to understand how financial incentives which keep Welsh students in Wales. This could have positive effects on the Welsh language.
- Providers should be encouraged to deliver more courses in Welsh.
- Providing Welsh versions of key documents for both students and providers will be essential in demonstrating the parity of language.
- Streamlining designation may remove barriers to Welsh language provision, as long as the provision is not deprioritised. This could enable a more cohesive approach to promoting Welsh-medium education.
- A published list of providers and partners providing Welsh language learning, as well as students studying through the medium of Welsh could assist in understanding how the system has impacted the Welsh language.
- The risk of new providers and the resultant increased call on the student support budget could impact Welsh language provision.
- Digital learning resources and platforms may not be available in Welsh or be of the same quality as English-medium equivalents. This could result in a disparity of provision.

## 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?**

**Number of responses: 12**

Answers provided under this question largely built on the comments made in response to question 9. Specific suggestions included:

- A Welsh language requirement should be included in registration and designation to encourage providers to expand Welsh-medium provision.
- Financial incentives should be provided aimed at developing Welsh-medium provision in underrepresented subject areas. Eligibility should include how institutions will embed Welsh language in teaching, learner support and institutional communications.
- All designated courses (regardless of where or how they are delivered) should be required to meet minimum Welsh language standards, including providing all information for students bilingually.
- Smaller providers should be provided with bespoke guidance on how to meet Welsh language standards.
- There should be continued monitoring and adjustment of proposals based on the impact they have on Welsh language provision, through regular reporting and consultation with stakeholders.
- A Welsh language risk assessment for alternative providers operating on a sub-contractual basis with Welsh institutions should be undertaken. Supported by additional Medr engagement with these providers
- A risk assessment regarding the impact of increased provision of School Centred Initial Teacher Training (only available in England) on the Welsh language should be undertaken.
- Comprehensive Welsh Language impact assessments should be mandated for all new policies, regulations and funding models which are conducted proactively to inform decision-making.
- The proposals would be strengthened by integrating Welsh language issues into them.

## 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:**

**Number of responses: 8**

There were a range of additional suggestions, comments and information that fell outside of the main questions within the consultation. The additional issues have been logged and the key themes emerging from them are listed below:

- **Timescales for implementation** – concerns were raised about the limited timescale for introduction of the register and the impact this could have on the 2026/27 and 27/28 fee limit statements. Universities currently have fee and access statements in place until the end of the 26/27 academic years and would expect, at this point, to be in the process of developing statements for 27/28. Respondents would appreciate further clarification regarding the target dates for each phase of the process. Furthermore, concerns were



raised that a truncated time period for implementation meant there is insufficient time for adequate development of related policy.

- **Further education colleges** - proposals would benefit from recognition of FE colleges and their role in delivering accessible, community and college based higher education that is industry focused to ensure they are not disadvantaged in terms of designation, funding or oversight. Medr and the Welsh Government should provide guidance on how the different models within FE colleges (franchised, directly funded, registered and specifically designated provision) will be regulated and funded. Transitional funding, training and resources should be considered to support providers through the changes.
- **Collaboration and co-operation** – there should be continued collaboration with UK counterparts given the number of Welsh domiciled students studying outside Wales to ensure learners are not disadvantaged by regulatory divergence.
- **Student protection and quality assurance** – the commitment to student protection and quality assurance is welcomed, particularly the link to the Office of the Independent Adjudicator (Higher Education) Scheme. It was believed this provided a means of independent redress for students. A respondent noted providers should understand the need to fully inform students about the fees they are expected to pay and the support available to them. It was also felt important that learner voices are included in the implementation of proposals.
- **Specific Course Designation** – greater clarity should be provided in terms of SCD for providers who choose not to register with Medr or Office for Students.
- **Higher education crisis** - validating partners are increasing their fees significantly, resulting in decreasing resource available to teach students and impacting their experience. This should be taken into account when considering the minimum fee loan.
- **Prescribed and non-prescribed** - a respondent noted in conversations they had with stakeholders there was considerable confusion around the regulation, funding and student support arrangements in relation to the differences between ‘prescribed’ and ‘non-prescribed’ higher education qualifications. They felt it would be useful to have more explicit description and discussion of these different categories of qualifications and their funding within the tertiary sector.