The Future of Tertiary Education in Wales

response form

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Responses should be returned by 27 March 2026 to:

Strategy and Funding

Tertiary Education Directorate

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or completed electronically and sent to:

email: TertiaryEducation.Consultations@gov.wales

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I agree to my name being published alongside my response to this consultation.	Y

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Information Commissioner's Office

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Participation

1. What further evidence is available regarding the backgrounds and pathways of young learners entering college on lower-level qualifications? Are these the right pathways for these learners?

There is a need to focus on ensuring that pathways are clearly articulated, well understood by learners, and supported by strong progression routes and learner support, rather than seeking to prescribe a single optimal pathway. This will also require improved system-level data sharing and insight to support a clearer understanding of learner pathways, progression and outcomes, and to enable effective system oversight and continuous improvement.

Evidence suggests that young learners entering college on lower-level qualifications are not a uniform group. Many are likely to have experienced disrupted schooling, deprivation, weaker prior attainment or other barriers that affect readiness to progress. More broadly, inequalities relating to deprivation, gender and disability continue to shape access and outcomes across the tertiary system.

There is also a wider structural context. Wales continues to face challenges around Level 3 attainment and entry to higher education at age 18, relative to other parts of the UK. At the same time, further education participation appears to be increasing, while school sixth form provision is contracting. This suggests that lower-level college pathways are becoming an increasingly significant part of the post-16 landscape.

From a quality perspective, the key issue is less whether these pathways are inherently right or wrong, and more whether they are sufficiently well designed and supported to enable progression. Lower-level vocational routes can offer valuable opportunities, but where progression rates are weaker and retention is lower, there is a strong case for diagnostic assessment, learning support and structured progression routes. Improving retention at lower levels is likely to be important if Wales is to raise qualification levels more broadly. Pathways also need to articulate clearly into both further study and employment, ensuring that learners are supported to achieve sustained and meaningful outcomes aligned to their goals.

Evidence from QAA's work on the Access to Higher Education Diploma illustrates how alternative pathways can support progression effectively where they are well designed. While Access is primarily an adult-focused route, in Wales a notable proportion of learners are aged 19 and under, suggesting that some younger learners are already using non-traditional pathways alongside more established Level 3 routes. This reinforces the importance of ensuring that all pathways, including those at lower levels, are clearly structured and supported to enable progression.

While QAA's primary remit relates to higher education and progression into it, this evidence highlights that non-traditional pathways can form an important part of a coherent system where progression, learner support and outcomes are the central focus.

2. What more do we know about the proximate causes of the recent uplift in college enrolments? Do we expect it to continue?

N/A

3. What reasons might there be for higher levels of part-time and mature student higher education entry in Wales? Can/should Welsh Government seek to increase full-time higher education entry at 18 given higher rates of part-time and mature participation?

It is important to focus on strengthening the full range of pathways into higher education. This includes ensuring that progression routes are clear and accessible, that flexible and part-time study options are supported, and that admissions practices maintain confidence in academic standards across different entry routes. This will also depend on timely and coherent data sharing to support system-level insight into participation patterns, enabling effective oversight, assurance and enhancement across the tertiary system.

Wales demonstrates a distinctive participation pattern compared to other parts of the UK, with lower rates of entry to higher education at age 18 but comparatively stronger participation through alternative and later entry routes. Participation is often distributed across the learner lifecycle rather than concentrated at age 18, with learners entering higher education through progression from further education, adult entry routes and alternative pathways.

This suggests that Wales already operates many of the characteristics associated with lifelong learning system in which participation is distributed across the learner lifecycle, rather than concentrated at a single-entry point. Higher levels of part-time and mature entry can therefore be seen as a strength of the Welsh system, reflecting its capacity to support learners at different stages of life and throughout different pathways.

However, this pattern also reflects wider structural challenges. Wales continues to lag behind other parts of the UK in entry to higher education at age 18, linked to factors such as Level 3 attainment and persistent inequalities relating to deprivation, gender and disability. This has implications for both individual opportunity and the supply of higher-level skills into the economy.

From a quality perspective, the key issue is not to prioritise one mode of entry over another, but to ensure that all pathways into higher education are coherent, accessible and support successful progression. This includes ensuring that progression pathways across the system remain clear and well understood, that learners are appropriately prepared for higher education study, and that admissions practices maintain confidence in academic standards across different routes.

Delivering this in practice will require alignment between funding mechanisms, regulatory expectations and system planning, alongside improved system-level data and insight to support understanding of participation patterns, progression and outcomes across the learner lifecycle.

4. The UK Government announced their ambition for two-thirds of young people to participate in level 4+ education or training by the age of 25, an increase from the current 50% participation rate. A sub-target was also introduced for at least 10% of young people to pursue higher technical education or apprenticeships by age 25 by 2040. Should Wales set a similar target to UK Government for level 4+ and/or apprenticeship participation?

N/A

5. What implications do the trends outlined in post-16 participation and elsewhere in this paper have for Welsh-medium and bilingual tertiary education?

A key consideration will be ensuring that Welsh-medium and bilingual pathways are coherent across the tertiary system, enabling learners to progress through different stages of education while maintaining access to provision in Welsh. This will also require improved system-level insight into demand, participation and progression, supported by timely data sharing to enable coordinated planning, effective oversight and continuous improvement.

The trends outlined in the paper suggest that Welsh-medium and bilingual tertiary education will require careful system planning if participation is to grow in a coherent and sustainable way. In particular, where participation increasingly takes place through a wider range of post-16 and later-life pathways, there is a need to ensure that learners are able to continue studying through the medium of Welsh, or bilingually, as they progress through the tertiary system.

Welsh-medium education remains stronger in some parts of the system than others, and the availability of Welsh-medium provision across further and higher education varies by subject area, institution and region. This can create challenges for learners wishing to continue studying in Welsh as they move between different stages of

education. In this context, growth in participation will need to be matched by attention to the coherence of Welsh-medium progression pathways, not simply the volume of provision.

QAA's recent engagement with sector partners on the development of the National Plan for the Welsh Language in Tertiary Education, including participation in the working group considering Medr's Welsh language regulatory condition, has highlighted the importance of coordinated planning to increase demand for and participation in Welsh-medium tertiary education, while ensuring sufficient provision to meet that demand. The draft condition also makes clear that providers will need strategies for increasing demand and participation, collaboration, workforce planning, and maintaining quality of provision and learner experience.

From a quality perspective, expansion must also be underpinned by clear and consistent academic standards. QAA's Subject Benchmark Statement for Welsh provides one example of how standards are articulated within a discipline, defining the knowledge and skills expected of graduates while allowing flexibility in delivery.

The implication for policy is that Welsh-medium and bilingual tertiary education should be considered as a system-wide pathway issue as well as a participation issue requiring coordinated planning, sufficient provider capacity, continued focus on maintaining standards and attention to how learners move through the system while maintaining access to high-quality Welsh-medium or bilingual provision.

Demographics and lifelong learning

1. How are tertiary education providers planning and preparing for forthcoming demographic change in their localities? What challenges will this create?

Policy development should support providers to plan strategically for demographic change through improved system-level data sharing and insight, alignment between funding and demand, and greater coordination of provision across regions, while maintaining confidence in academic standards and the quality of the learner experience.

Wales is projected to experience a decline in the population of 16 to 18 years olds over the coming years, with variation across regions. This is expected to reduce the number of traditional school leavers entrants into tertiary education and increase reliance on adult learners, part-time study and upskilling and reskilling pathways.

Evidence suggests that provider responses are variable. Some providers are actively modelling future demand and considering how provision may need to adapt, while there is a risk that others may underestimate the scale and pace of demographic change and its implications for local provision.

More broadly, a shift towards greater reliance on adult and part-time learners introduces additional complexity in delivery. Providers will need to support learners entering at different stages of life, often combining study with employment or caring responsibilities, while maintaining coherent pathways and a consistent learning experience. This has implications for curriculum design, learner support and the sustainability of provision.

From a quality perspective, these changes increase the importance of clear progression routes, effective learner support and robust approaches to maintaining academic standards across a more diverse and flexible system.

Evidence from QAA's Access to HE regulatory work suggests that providers are beginning to respond to these trends through more strategic planning and delivery approaches. In Wales, this includes a focus on regional equity of provision, diversification of subjects, development of flexible delivery models for adult and diverse learners, bilingual expansion, alignment with skills needs, and more data-informed planning to respond to changing learner numbers.

At the same time, this creates a number of challenges. Provision and participation remain unevenly distributed geographically, and future growth will depend on the sustainability of delivery models for adult learners, including flexible provision, bilingual capacity and alignment with regional skills demand.

Overall, demographic change is likely to place greater pressure on providers to plan more strategically across regions, subjects and modes of delivery, particularly where

participation increasingly depends on adult, part-time and non-traditional learners rather than a growing pool of school leavers.

2. What are the funding, legislative, and administrative barriers to increasing supply of, and demand for, flexible and accessible lifelong learning opportunities, both at lower levels (below level 3) and higher levels (above level 4)?

It will be important to focus on addressing structural barriers across funding, regulation and system design that currently limits the expansion of flexible and accessible lifelong learning, while ensuring that academic standards and the quality of the learner experience are maintained. This includes strengthening system-level data sharing and insight to support coordination, oversight and continuous improvement across the tertiary system. This will also require aligning funding mechanisms with modular and part-time provision, improving clarity around credit recognition and progression, and supporting greater system coordination across further education, higher education, and work-based learning.

Flexible and accessible lifelong learning opportunities are shaped by a combination of funding, legislative and administrative factors, which together influence both the supply of provision and learner demand across the system.

Funding barriers remain a central constraint. Current funding arrangements can incentivise full programme delivery over modular or flexible provision, limiting the ability of providers to develop and sustain part-time, bite-sized or non-linear learning opportunities. There is also evidence of complexity and inconsistency in how funding for part-time and adult provision is understood and accessed, which may affect both provider behaviour and learner uptake. In Wales, routes such as the Access to Higher Education Diploma highlight both the importance of adult-focused provision and the pressures it faces, including declining participation alongside strong progression outcomes.

Legislative and regulatory factors can also create uncertainty where expectations for flexible provision, credit recognition and progression are not consistently defined across the system. As provision becomes more modular and is delivered across multiple providers or settings, clarity around responsibilities for quality, standards and awards becomes increasingly important.

Administrative barriers include the complexity of learner journeys across further education, higher education and work-based learning. Fragmentation in information, advice and guidance, and a lack of clarity around progression routes, can make it more difficult for learners to navigate the system, particularly those returning to education

later in life. Data limitations can also make it harder to understand learner demand, progression patterns and where interventions may be most effective.

More broadly, the expansion of flexible learning introduces additional complexity in how provision is designed and delivered. Providers are increasingly required to support diverse learner groups studying across different modes, intensities and entry points, often alongside employment or caring responsibilities. Ensuring a coherent and high-quality learning experience across this diversity, particularly in a context of financial constraint, presents a significant challenge.

QAA's engagement with its membership across the UK indicates that while there is strong interest in expanding flexible and modular provision, progress is often constrained by these structural and system-level barriers. Through its convening role, including work with members on initiatives such as microcredentials and recognition of prior learning, QAA has highlighted the importance of shared approaches to credit, quality assurance and learner information in supporting more flexible pathways.

Experience across the UK suggests that these barriers are not solely technical but are shaped by wider system design. Developments such as the rollout of the Lifelong Learning Entitlement in England illustrate how funding reform can act as a key enabler of modular learning, while also highlighting potential risks where approaches diverge across the UK.

Addressing these barriers will therefore require coordinated action across funding, regulatory and system design, alongside continued sector collaboration to support flexible provision while maintaining confidence in academic standards and learner outcomes.

3. What changes need to be made to ensure appropriate opportunities for adults to improve their foundational skills in literacy, numeracy and digital literacy alongside vocational skills and other learning?

N/A

4. What lessons can be learned from the Personal Learning Account programme, and how can the successes of that policy be evaluated and expanded?

N/A

5. What further education and training for adults aged 19 and over should be prioritised for inclusion in regulations to be made under section 94 of the Tertiary Education and Research Act?

A key consideration will be to ensure that provision prioritised under section 94 supports progression into higher levels of study, is flexible in mode and pace, responds to regional and sectoral skills needs, and enables learners to balance study with work, care or other responsibilities, while maintaining confidence in academic standards.

Within this context, there is a case for ensuring that adult-focused Level 3 pathways are not overlooked within a policy framework that is otherwise focused on lifelong learning and progression.

Evidence from Wales suggests that the Access to Higher Education Diploma is a well-established example of such provision. It plays a significant role as a progression route into higher education, with a higher proportion of entrants progressing via Access than the UK average, and with very strong progression rates compared to other Level 3 routes. It is also strongly aligned with adult participation and widening access.

This indicates that adult-focused Level 3 provision can form an important part of a coherent tertiary system, particularly in the context of demographic change and increasing reliance on later entry and flexible pathways.

Welsh Government may therefore wish to consider how such pathways are supported within the regulations made under section 94, alongside wider provision that meets these criteria.

1. What are the current barriers to greater collaboration between tertiary education providers? What are the current enablers of effective collaborations?

Collaboration between tertiary education providers in Wales is shaped by a mix of structural, financial and operational factors, which can act as either barriers or enablers depending on how they are configured.

A significant barrier is the wider financial environment. In a constrained funding context, institutions may prioritise recruitment and income generation, which can reduce incentives to collaborate where this may affect enrolment or institutional sustainability. This can create tension between system-level collaboration and provider-level viability.

A further barrier is the complexity created by differences in how provision is structured, funded and regulated across the tertiary system. The Credit and Qualifications

Framework for Wales comprises three pillars, Higher Education, Regulated Qualifications, and Lifelong Learning, each with distinct expectations and norms. QAA's Micro-credential Framework for Wales and Northern Ireland highlights that microcredentials can sit within any of these pillars but are often understood differently depending on sector conventions. For example, terms such as "award" and "credit" do not carry the same meaning in further education and adult and community learning as they do in higher education, which can create misunderstanding and make collaboration, portability and shared delivery more difficult in practice.

Operational complexity is another barrier. Collaborative provision, particularly where it involves shared delivery or multiple partners, requires clear governance arrangements, defined responsibilities for academic standards, and coordinated approaches to student support. Where these arrangements are unclear, collaboration can introduce risks to the quality of provision and the student experience. QAA's review handbook for Wales also makes clear that collaborative provision falls within the scope of external review and that awarding bodies retain responsibility for the academic standards of awards delivered through such arrangements.

Effective collaboration is more likely where a number of enabling conditions are present. Clear and robust governance arrangements are critical, ensuring that responsibilities for academic standards, quality assurance and learner support are well defined across all partners. Alignment of incentives, including funding and strategic priorities, can also support collaboration by ensuring that institutions are able to participate without undermining their core mission or financial sustainability. A shared understanding of purpose is equally important, particularly where collaboration is intended to address regional needs, support specific learner groups, or sustain provision in key subject areas.

There are also practical enablers. Greater alignment in terminology, credit frameworks and expectations across different parts of the tertiary system could support more effective collaboration, particularly as flexible and modular forms of provision continue to develop. QAA's Micro-credential Framework for Wales and Northern Ireland was designed in part to support more consistent approaches to terminology, quality and standards, learner information, partnerships and portability across the tertiary system.

QAA's work in reviewing partnership provision and collaborative delivery arrangements also highlights the importance of clearly defined responsibilities and robust oversight where provision is delivered across multiple partners. The review method in Wales expects providers to evidence how they manage quality and standards across collaborative provision, including through registers of collaborative provision and specific reporting on collaborative arrangements where relevant.

Overall, collaboration has the potential to support system resilience and extend opportunity, but it is not a universal solution. Its success depends on whether the conditions are in place for it to operate effectively. Policy development may therefore wish to focus on reducing structural barriers, improving cross-sector clarity, and supporting governance arrangements that enable collaboration to deliver clear value for learners while maintaining confidence in academic standards and the quality of the student experience.

2. Are there further examples of schools and colleges collaborating to maintain a broad and accessible curriculum in post-16 education and to improve transition between pre- and post-16? Are there further examples of universities collaborating to deliver degree provision? Can this be further developed to safeguard at-risk subject areas?

N/A

3. What are the benefits and disbenefits of the uncapped market for home undergraduates, both for students and for institutions? How does the higher education sector expect the market to develop over the coming decade, particularly when the number of 18-year-olds begins to decline?

N/A

4. Where are there risks of 'higher education cold spots' in Wales? Are there particular subject areas at threat due to market competition and changing student preferences?

Policy development should consider how system-level planning and funding approaches can support the maintenance of accessible provision across regions and subject areas, particularly where market dynamics and demographic change may otherwise lead to gaps in provision.

The risk of "higher education cold spots" in Wales is less about the complete absence of provision and more about how access to higher education is distributed across different learner groups, regions and subject areas. Wales benefits from a relatively distributed network of universities, further education colleges and partnership-based provision, which helps mitigate the emergence of clearly defined geographic cold spots.

However, risks may arise where access to higher education is more dependent on local provision, particularly in rural or more sparsely populated regions. In these contexts, the sustainability of provision, including through local campuses, franchised delivery or partnership arrangements, may be more sensitive to financial pressures and demographic change. Where provision is reduced or consolidated, there is a risk that learners, particularly those who are less mobile or are studying later in life, may face increased barriers to participation.

This is particularly relevant in the Welsh context, where participation is more distributed across the learner lifecycle rather than concentrated at age 18. Access to higher education through further education, adult learning and pathways such as the Access to Higher Education Diploma plays a significant role. Evidence suggests that provision and participation in Access are unevenly distributed geographically, with around 45 per cent concentrated in South East Wales, compared with 26 per cent in both South West and North Wales, and around 2 per cent in Mid Wales.

This indicates that risks of "cold spots" may emerge not only in terms of higher education provision itself, but also within the pipeline of learners progressing into higher education. Without sufficient local access to Level 3 and adult pathways, learners may face barriers to entry regardless of the availability of higher education provision.

There are also potential risks at subject level. In a more competitive and financially constrained environment, provision in subjects with lower or less stable demand, or higher delivery costs, may be more vulnerable to reduction or consolidation. This may be particularly relevant for specialist subjects or those requiring significant infrastructure, where provision may become concentrated in a smaller number of providers. Over time, this could reduce choice and accessibility for learners in certain regions.

Financial sustainability

1. What are the best examples of tertiary providers ensuring efficiency in the delivery of course provision while maintaining quality? And what are the challenges in doing this?

There is a case for ensuring that efficiency-driven changes to provision, including curriculum transformation, collaboration and portfolio rationalisation, are supported by coordinated system-level planning and robust quality assurance, so that academic standards and the quality of the student experience are not compromised.

Across the tertiary sector, providers are adopting a range of approaches to improve efficiency in the delivery of provision while maintaining the quality of learning and teaching. These approaches are often shaped by financial pressures, demographic change and the need to respond to more diverse learner needs.

In practice, this includes curriculum transformation and more active portfolio management, with institutions reviewing the balance of provision across subject areas, modes of delivery and levels of study.

Providers are also exploring more flexible and modular forms of provision, including microcredentials and shorter courses. These approaches can enable provision to be delivered to different groups of learners, including those combining study with employment, while supporting progression through stacking and credit accumulation.

Efficiency can also be supported through collaborative delivery models, including partnership arrangements between further education colleges, universities and training providers. These can enable providers to share expertise, avoid unnecessary duplication of provision and extend access to learners in different locations. Where such arrangements are well-designed, with clear governance and defined responsibilities for academic standards and quality assurance, they can support both efficiency and high-quality delivery.

In addition, providers draw on shared sector reference points, such as the UK Quality Code, Framework for Higher Education Qualifications, Characteristic Statements, and Subject Benchmark Statements, which are developed and maintained by QAA in collaboration with the sector, to support consistency in academic standards while allowing flexibility in how provision is designed and delivered. These shared reference points enable providers to adapt provision in response to changing learner needs without requiring entirely new quality frameworks to be developed.

Differences across the tertiary system can also create challenges. Variations in terminology, credit systems and regulatory expectations between further education, higher education and other parts of the system can make it more difficult to design and deliver provision efficiently across institutional boundaries. Through our work with the sector QAA has identified how these differences can act as barriers to collaboration and to the development of flexible learning pathways, and has addressed this through the

development of the Microcredentials Framework for Wales and Northern Ireland, which supports greater alignment in how provision is designed, recognised and quality assured.

There are, however, significant challenges in balancing efficiency with quality. Delivering high-quality learning experiences requires sustained investment in staff, the learning environment and infrastructure and student support, and there is a clear relationship between resource and quality. In a financially constrained environment, there is a risk that efforts to improve efficiency may place pressure on these areas, with potential implications for the student experience and the maintenance of academic standards. QAA will publish UK Quality Code advice and guidance on Principle 3: Resourcing delivery of a high-quality learning experience in summer 2026.

There are also challenges associated with complexity. As provision becomes more flexible, modular and collaborative, providers must manage more complex arrangements for delivery, assessment and student support, often across multiple partners or modes of study. Ensuring that learning experiences remain coherent, and that responsibilities for quality and standards are clearly defined, can be difficult in these contexts.

Finally, there is a broader challenge in ensuring that efficiency is not pursued at the expense of educational quality. Approaches that improve efficiency in delivery must continue to support effective teaching, meaningful assessment and positive learner outcomes. Maintaining a clear focus on academic standards, the student experience and coherent learner pathways remains essential as providers adapt their delivery models.

Overall, while there are clear examples of approaches that can support efficiency, their success depends on appropriate resourcing, clear governance and a continued focus on maintaining high-quality learning experiences across an increasingly diverse and complex tertiary system.

2. Where are there opportunities for cost-savings in the delivery of tertiary education?

Opportunities for improving efficiency in the delivery of tertiary education are primarily being pursued through changes in how provision is organised and delivered across the system. These developments are often driven by financial pressures, demographic change and the need to respond to more diverse learner needs.

One area where this can be observed is in the development of more flexible and modular forms of provision, including microcredentials and shorter courses. While these approaches may support more efficient use of resources, they also introduce new considerations for how academic standards are maintained, particularly in relation to assessment design, credit recognition and the coherence of learning pathways.

Efficiency is also being sought through increased collaboration and partnership-based delivery, including arrangements between further education colleges, universities and training providers. These models can reduce duplication and support the sustainability of provision, particularly in areas of lower demand. However, they also require clear governance arrangements to ensure that responsibilities for academic standards and the quality of the student experience remain well defined.

At a system level, there are potential efficiencies associated with improving the coherence of learner pathways across further education, higher education and work-based learning. Greater alignment can reduce duplication of learning and support credit transfer, but depends on consistent approaches to recognition, progression and quality assurance across different parts of the system.

Across these areas, evidence from QAA's review and enhancement work indicates that changes to delivery models, often driven by financial pressures and the need to respond to changing demand, can increase the complexity of provision. This is particularly evident in areas such as partnership delivery and transnational education, where additional governance, oversight and quality assurance arrangements are required.

There are also important limits to where cost savings can be realised. Delivering high-quality education requires sustained investment in staff, infrastructure and student support, and there is a clear relationship between resource and quality. While efficiencies may be achieved through better coordination and system design, reductions in core resourcing risk undermining the quality of learning and teaching and confidence in academic standards. QAA will publish UK Quality Code advice and guidance on Principle 3: Resourcing delivery of a high-quality learning experience in Summer 2026.

In this context, shared sector frameworks and reference points, developed and maintained by QAA, support efficiency across the system by providing a common basis for academic standards. This reduces the need for providers to develop separate approaches, supporting both consistency and more efficient system operation. Realising these efficiencies will also depend on timely data sharing and improved system insight to support coordinated planning, effective oversight and continuous assurance across the system.

Overall, opportunities for cost savings are closely linked to system change. Ensuring that these changes are accompanied by robust quality assurance arrangements and a continued focus on academic standards will be essential to maintaining confidence in the tertiary system.

3. What further evidence is available regarding the cost barriers to accessing tertiary education for learners and students?

Available evidence highlights that cost remains a significant barrier to accessing tertiary education, particularly for learners entering through non-traditional pathways.

Evidence from QAA's Access to Higher Education Diploma case study indicates that a substantial proportion of Access learners are adult returners to education, many of whom face multiple, overlapping cost pressures. These can include direct costs associated with study, as well as wider financial pressures linked to employment, caring responsibilities and household commitments.

The case study also highlights that a significant proportion of Access learners have additional support needs, with around 38 per cent declaring a learning need or disability. This can increase the cost of participation through additional requirements such as specialist equipment, assistive technology or tailored support, as well as indirect costs such as travel or adjustments to study patterns.

More broadly, learners entering tertiary education through further education, adult learning or part-time routes may be more sensitive to cost barriers than traditional school leavers. These learners are more likely to be balancing study with employment or other responsibilities and may be less able to absorb upfront or ongoing costs associated with participation.

Cost barriers are therefore not limited to tuition fees, but include a wider range of factors such as travel, childcare, digital access, including access to AI tools, and the availability of financial support mechanisms. These factors can influence both initial access to tertiary education and learners' ability to sustain participation over time.

From a system perspective, these issues underline the importance of ensuring that pathways into and through tertiary education remain accessible to a diverse range of learners. Where cost barriers are not addressed, there is a risk that participation is constrained, particularly for those entering through adult or alternative routes that are central to Wales' lifelong learning ambitions.

4. Where should Welsh Government prioritise direct (grant expenditure) and indirect (loan outlay) support for tertiary education? What evidence is available regarding the best social/economic and private/public returns on such investments?

Evidence suggests that investment in pathways that support access to tertiary education for learners with the greatest barriers to participation can deliver significant social and economic returns.

The Access to Higher Education Diploma provides a clear example of this. The Diploma is specifically designed to support adult learners, many of whom face financial, structural and educational barriers to participation, including those on low incomes, with caring responsibilities, with disabilities, or without prior Level 3 qualifications. Evidence from QAA's regulatory and enhancement activity indicates that reducing financial barriers for these groups can have a disproportionate impact on participation and progression.

The Access Diploma is a well-established Level 3 qualification, regulated by QAA, and widely recognised by higher education providers. It offers a flexible route into higher education, delivered on both a full-time and part-time basis, and is closely aligned to workforce needs. In Wales, provision is delivered across further education colleges through Access Validating Agencies, with strong representation in subject areas such as health, social sciences and biosciences.

Available data indicates that Access learners are more likely to come from disadvantaged backgrounds and are often underrepresented in traditional higher education entry routes. At the same time, progression outcomes are strong, with a high proportion of learners progressing to higher education and remaining within Wales, supporting local skills needs and regional economies.

More broadly, evidence from adult learning research suggests that cost is a key barrier to participation for adult learners, and that financial support has the greatest impact on those with lower prior attainment. This indicates that investment targeted at flexible, part-time and locally accessible provision can play an important role in widening participation and supporting lifelong learning.

From a system perspective, this points to the importance of ensuring that funding approaches support pathways into and through tertiary education, particularly for learners entering through non-traditional routes. Aligning funding with these pathways can support both participation and progression, while contributing to wider social and economic outcomes.

5. Where should Welsh Government prioritise future capital investments in tertiary education infrastructure and estates?

N/A

Communities and the economy

1. What elements of Longitudinal Education Outcomes (LEO) data should Welsh Government and Medr prioritise to better understand labour market outcomes from tertiary education?

N/A

2. Aside from LEO, what other data and information should be better utilised to understand the labour market outcomes of tertiary education?

N/A

3. How can Welsh Government support for research funding best leverage UK-wide funding and 'crowd in' private sector investment?

N/A

4. Collaboration and specialisation of institutions may create efficiencies and stronger agglomeration effects for teaching, employment and RD&I. What evidence can be used to underpin this, and does it suggest what and how specialisation should take place?

It is important to ensure that collaboration and specialisation are supported by an external environment that incentivises and enables coordinated approaches across the tertiary system, including through aligned funding, regulatory frameworks and strategic planning, while maintaining confidence in academic standards and the quality of the student experience.

QAA's role as a sector body provides us with a wealth of evidence that collaboration between institutions and a degree of specialisation can support efficiencies and strengthen links between education, research and regional economic activity. Collaborative arrangements may enable institutions to pool expertise, sustain provision in particular subject areas and align more closely with local skills needs.

However, effectiveness is inevitably influenced by factors such as governance arrangements, institutional incentives and alignment with regional demand. As a result, collaboration and specialisation do not in themselves guarantee improved efficiency or stronger outcomes.

From a tertiary education perspective, collaboration and shared delivery models are already an established feature of the system, particularly through partnership provision and joint delivery arrangements. QAA's work in reviewing partnership-based provision highlights that where collaboration is effective, there is typically clear delineation of responsibilities for academic standards, robust governance structures and strong communication between partners.

There are also potential risks associated with increased collaboration or specialisation. A key consideration is the impact on learner access and pathways. Greater concentration of provision in particular institutions or locations may create barriers for learners, particularly those who are less geographically mobile or who rely on local provision. This may be particularly relevant in Wales, where participation is more distributed across different entry routes and stages of the learner lifecycle.

There are also risks relating to quality and standards. Where provision is delivered across multiple partners, or where institutions focus on particular areas of provision, maintaining consistency in academic standards and ensuring a coherent learner experience becomes more complex. Clear governance arrangements, well-defined responsibilities and effective quality assurance processes are therefore essential.

In addition, there may be implications for institutional autonomy and diversity. Wales has a diverse tertiary sector with institutions fulfilling different roles and missions.

Approaches to collaboration or specialisation that do not take account of this diversity may risk reducing flexibility or limiting the ability of institutions to respond to local or emerging needs.

QAA also plays a direct role in supporting the sector to deliver effective collaboration and specialisation. Through our review work, membership activity and the development of shared sector frameworks and reference points, QAA supports institutions to manage quality and standards across partnership provision and more specialised delivery models, helping to provide confidence in increasingly coordinated and complex forms of provision.

Overall, while collaboration and specialisation may offer opportunities for efficiency and alignment with regional priorities, their effectiveness depends on how they are implemented in practice. From a quality perspective, ensuring that these approaches are supported by robust governance, clear accountability and a continued focus on learner access and the student experience will be critical.

5. What opportunities and threats does AI pose to the future of tertiary education? What implications are emerging from its uses for providers and for Welsh Government policy?

The rapid development of artificial intelligence is reshaping the context for learning, teaching and assessment across the tertiary system. Its impact is already being felt in how learners engage with study, how providers design assessment, and how confidence in qualifications is maintained.

QAA's analysis of recent sector evidence, including student surveys, highlights both the scale and pace of change in the use of generative AI. This analysis indicates that student use of generative AI has increased rapidly over a short period, with the vast majority of students now reporting use of these tools and a similarly high proportion using them in relation to assessed work. Patterns of use vary, including supporting understanding through summarising content or explaining concepts, as well as a smaller proportion of more direct use in generating assessed outputs.

This evidence also highlights the factors shaping student behaviour. Students report using generative AI primarily to improve the quality of their work and to save time, while concerns about academic integrity, the risk of inaccurate outputs and potential accusations of misconduct can act as deterrents. This is also emerging evidence that assessment design influences how students use AI, with greater use of AI to support learning where students are required to explain or defend their work.

Alongside increasing use, the evidence highlights a number of concerns. These include lack of clarity around permitted use, risks relating to misinformation and intellectual

property, and the potential over-reliance on AI to affect the development of understanding. There are also growing concerns around equity, including differences in access to paid tools, variation in institutional guidance and differences in willingness to use AI across student groups, all of which may impact on outcomes.

These issues will form a key focus of QAA's membership and sector engagement activity, as we continue to work with providers to develop shared understanding and approaches to the use of generative AI in learning, teaching and assessment.

QAA's engagement with the sector indicates that these issues are being actively explored. Through networks such as the Academic Integrity Advisory Group and the Welsh Integrity and Assessment Network, as well as ongoing work with the Student Strategic Advisory Group, QAA is gathering insight into how institutions and learners are responding to the use of generative AI.

QAA is also undertaking a "state of the nation" project examining the impact of generative AI on assessment. This work brings together analysis of existing sector evidence, insights from staff roundtables and student focus groups, and findings from QAA review activity. The project will inform a policy-facing output this summer, supporting a shared understanding of emerging practice and its implications for academic standards.

AI presents a number of opportunities for the sector. It has the potential to support innovation in teaching and learning, including more personalised learning approaches, enhanced feedback mechanisms and new forms of digital delivery. It may also support improvements in efficiency in certain aspects of provision and administration.

At the same time, AI introduces significant challenges. A key issue relates to academic integrity and assessment design. As generative AI becomes embedded in student practice, providers are increasingly reviewing how assessment methods demonstrate authentic learning and how academic misconduct is defined and addressed in this context.

For providers, the implications centre on the need to adapt assessment practices, ensure clarity in expectations around the use of AI, and maintain robust approaches to academic integrity. This may involve designing assessment that focuses more explicitly on the demonstration of understanding, including opportunities for students to explain, apply and reflect on their learning.

For Welsh Government, the implications are primarily systemic. As AI becomes embedded in learning and assessment, there will be a need for ongoing dialogue with the sector to ensure that policy and regulatory approaches remain proportionate and responsive. This will also require improved system-level insight into emerging practice,

supported by timely data-sharing and sector engagement, to enable proportionate oversight and to inform ongoing assurance and enhancement activity. This will also include supporting innovation while maintaining confidence in academic standards and qualifications and ensuring that emerging approaches do not unintentionally create inequities for learners.

There may also be a role in ensuring that sector-wide frameworks and reference points continue to evolve in response to technological change. QAA's work to consider how AI is reflected in refreshed sector reference points, including Subject Benchmark Statements, highlights the importance of maintaining a shared understanding of standards as new forms of learning and assessment develop.

Overall, AI presents both opportunities for innovation and significant challenges for the maintenance of academic standards. The emerging evidence suggests that how assessment is designed, how expectations are communicated and how equity is addressed will be central to ensuring that AI supports learning rather than undermining confidence in qualifications.