

Consultation on a new regulatory system including conditions of registration and funding response

Question 1. It is our intention to be a proportionate and risk-based regulator in line with the commitments in our Strategic Plan. In relation to our proposed [Regulatory Approach](#):

To what extent do you agree that our Regulatory Approach will support our ability to fulfil the aims of our Strategic Plan?

Agree

To what extent do you agree that our Regulatory Approach will support our intention to be a proportionate and risk-based regulator?

Agree

To what extent do you agree with the philosophy, principles and expectations set out in our Regulatory Approach?

Agree

Question 2. Could the Regulatory Approach, as set out, be applied consistently across all tertiary providers?

Partially

QAA welcome the intention to develop a Regulatory Approach that applies consistently across the tertiary education sector. The emphasis on proportionality, transparency and risk-based engagement provides a solid foundation for this ambition.

To support consistent application, we would encourage greater clarity around how the approach will accommodate the diversity of providers and the differing levels of complexity and risk across the sector. For example, institutions with significant research activity, international student populations or multi-campus operations may present distinct regulatory considerations compared to smaller or more locally focused providers.

The two engagement models outlined in the monitoring framework are a helpful starting point. However, it would be beneficial to set out more clearly how decisions will be made about which model applies in different contexts, and how institutional autonomy will be preserved across the system. There is a need for greater transparency around how risk is assessed and how this informs the proportionality of Medr's regulatory response.

We would welcome further engagement as Medr refines its approach, and we are committed to supporting the development of a regulatory system that is both coherent and responsive.

Question 3. Is the Regulatory Approach sufficiently reflected throughout the different Conditions of Registration and Conditions of Funding that are set out in this consultation?

Partially

QAA support the intention to embed the Regulatory Approach throughout the Conditions of Registration and Funding, particularly the emphasis on proportionality, provider responsibility, and risk-based oversight. These concepts appear in multiple sections of the framework and are welcomed.

However, at this stage of development, the connection between the Regulatory Approach and the draft conditions is not yet fully coherent. While many of the right elements are present, the way in which risk, proportionality and responsiveness are expected to influence regulatory decision-making could be more clearly articulated within the conditions themselves, particularly in terms of how they will guide monitoring intensity or trigger intervention.

In addition, greater alignment between the general philosophy of the Regulatory Approach and some of the more operational conditions (for example, around reportable events or financial sustainability thresholds) would help to reinforce confidence that the approach will be applied as intended in practice.

We would also welcome further clarity on how the Regulatory Approach will inform Medr's engagement across different parts of the tertiary sector, especially in relation to the balance between assurance, continuous improvement, and enhancement.

Additional comments

QAA welcomes Medr's commitment to transparency, collaboration and continuous improvement as central features of its Regulatory Approach. These align well with QAA's own values and principles.

We note and welcome the reference to the European Standards and Guidelines (ESG) in the documentation. While brief, this inclusion provides a degree of reassurance that the framework is being developed with international alignment in mind. As the system evolves, we encourage continued attention to ESG principles to ensure global comparability and to support the confidence of international partners in Welsh tertiary provision.

We remain committed to working constructively with Medr and the sector to support the development of a proportionate, trusted and effective regulatory system.

Question 4. Intervention powers:

To what extent do you agree that the interventions align to the Act's intentions?

Agree

To what extent do you agree that the Statement of Interventions align with our Regulatory Approach?

Agree

Question 5. Would supplementary guidance for the Statement be helpful?

Yes

Please note the areas where supplementary guidance would be helpful:

Supplementary guidance would be helpful to support clarity and confidence in the application of the intervention powers.

Areas where further guidance would be most valuable include:

- **Escalation triggers and thresholds:** Greater clarity on how Medr will decide when to move from routine monitoring or engagement to formal interventions (e.g. Directions or deregistration) would support provider understanding and planning.
- **Distinction and sequencing of specified vs non-specified interventions:** While the flexibility to use both is welcome, more detail on how decisions will be made between them would improve transparency and consistency.
- **Risk-based judgement:** Providers would benefit from illustrative examples of how Medr will factor in contextual risk (e.g. institutional complexity, financial position, delivery model) when determining the nature or intensity of intervention.
- **Interaction with other parts of the framework:** There may be value in explaining how interventions sit alongside monitoring and continuous improvement/enhancement activity, and how actions under one strand (e.g. a reportable event) might lead to a regulatory response.

QAA would welcome continued dialogue as this guidance develops.

Question 6. In the Statement, we have provided two potential models for our approach to engagement with those providers that we monitor – do you have any comments in relation to this?

QAA welcome the inclusion of the two models as a helpful way to prompt sector-wide discussion about the nature of regulatory engagement. Both offer recognisable features: Model 1 focuses on targeted compliance and aligns with traditional regulatory principles of institutional autonomy and accountability, while Model 2 presents a more holistic and developmental relationship.

However, we would caution against presenting these models as a binary choice. In practice, effective regulation will likely require a blend of both, combining sustained, collaborative engagement with the ability to respond decisively and proportionately to emerging risk. Indeed, where there are immediate or serious concerns, Medr would likely need to revert to Model 1 regardless of the underlying engagement model. A flexible approach, adapted to provider context and risk profile, may be more appropriate than formally categorising providers.

We also note that only Model 1 explicitly refers to institutional autonomy, a core principle of UK higher education regulation. We would strongly encourage Medr to reaffirm this principle across all models of engagement.

Finally, we would welcome more clarity on how these models interact with the Statement of Intervention. At present, it is not always clear how early-stage engagement under either model would transition into the more formal stages of the intervention framework.

We look forward to continued dialogue on how a responsive and risk-based model of engagement can support both assurance and enhancement across the tertiary education sector.

Question 7. Do you have any other comments regarding the proposed approach to monitoring compliance with Conditions of Registration / Funding?

We welcome the direction of travel toward a risk-based and proportionate model of monitoring. However, there is a lack of clarity in how the proposed system would operate in practice, particularly in how the seven “compliance requirements” relate to the seven pillars in the Quality Framework, and how they link to specific thresholds for intervention. This risks generating confusion for providers about what they must do to comply, how they demonstrate compliance, and what actions may be taken in the event of concern.

Question 8.

Quality and Continuous Improvement

Could the condition be applied consistently across all tertiary providers

No

Are the requirements of the condition proportionate?

No

Does this condition provide sufficient clarity regarding requirements?

No

Do you have any additional comments regarding the Conditions of Registration? Please indicate which Conditions you are referring to in your response

Quality and Continuous Improvement

QAA strongly support the aim of embedding continuous improvement/enhancement and clear expectations around quality into the regulatory system. However, we have reservations about the way the Quality and Continuous Improvement condition is currently constructed.

Consistency:

The condition is framed in a way that assumes all providers are already operating within Medr’s Quality Framework. For new providers, this creates a circularity, they must demonstrate compliance with a framework they have not yet had the opportunity to engage with. As such, the condition is unlikely to be applied consistently across providers entering the system at different stages of maturity or from different parts of the sector.

Proportionality:

The breadth of the condition, requiring compliance with all “expectations and requirements” of the Quality Framework, risks becoming overly rigid and could fail to account for the diversity of missions and provision types across tertiary education. A more proportionate approach would require providers to demonstrate alignment with the framework’s principles and intent, rather than full compliance from the outset.

Clarity:

There is confusion between the wording of the condition (expectations and requirements), the compliance requirements listed elsewhere in the framework, and the seven pillars of quality. Monitoring arrangements appear to align more closely with the pillars, creating uncertainty about what constitutes compliance and what evidence is expected. Furthermore, it is unclear whether providers will be held to expectations outside of the Quality Framework, and if so, what those are. The absence of threshold definitions or illustrative guidance adds to this lack of clarity.

We recommend revisiting the drafting of this condition to ensure it is clear, proportionate, and operable for all types of providers, especially new applicants. A stronger connection between this condition and the practicalities of quality review and monitoring would also be welcome.

Question 9. To what extent do you agree that the drafting clearly sets out the statutory basis for the Framework and what it is intended to achieve?

Disagree

Question 10. Is the scope of the definition of quality appropriate?

No

What further clarification is needed?

QAA would welcome greater clarity on how the definition of quality will be applied in practice. The current formulation is too broad, encompassing “all aspects of the learner experience” and equating quality with the achievement of good outcomes but offers limited guidance on what providers must actually demonstrate, or how quality will be assessed consistently across different contexts.

There is also a disconnect between this broad definition and the narrower focus of the seven pillars, which lean more heavily on institutional processes. A clearer articulation of how the definition, pillars, and compliance requirements relate to one another would improve coherence.

We also suggest being more explicit about the role of teaching and learning within the definition, and how quality will be judged independently of outcomes, particularly in cases where student progression or satisfaction may not provide a complete picture of academic quality. Finally, it would be helpful to indicate whether providers will be held to any expectations beyond the Quality Framework, and if so, how these will be communicated.

Question 11. To what extent do you agree that the proposed principles are appropriate?

Agree

Question 12. Which proposed features of the quality framework would have the most impact / add most value in sustaining and improving quality over time?

We welcome the structure and intent of the Quality Framework, particularly the inclusion of

features that support both assurance and enhancement. Several of the proposed elements, notably the seven pillars and the role of external quality assessment, have strong potential to support sustained quality improvement.

In particular, we highlight the following:

- **Cyclical external review:** The inclusion of regular, structured review is a significant strength. It offers opportunities for reflection, supports public confidence, and enables providers to engage meaningfully with enhancement as well as assurance over time.
- **Self-evaluation:** Encouraging institutions to evaluate their own performance is a valuable feature. When supported by clear expectations and appropriate review, it enables providers to take ownership of their quality and build improvement into core activity.
- **Externality:** External input brings independence, challenge and broader sector insight. Its role within review and assessment processes should be retained and clearly defined.
- **Professional learning and development:** Including this as a pillar is a welcome recognition that staff expertise and reflective practice are essential to delivering and sustaining high-quality learning environments.
- **Learner engagement and learner voice:** These reinforce a student-centred approach and, when meaningfully embedded, can drive relevant and responsive provision.

To maximise impact, it would be helpful to clarify the relationships between the seven pillars, the compliance requirements, and the monitoring arrangements. As currently drafted, these components are not clearly aligned, which may cause uncertainty for providers.

We also suggest strengthening the Framework's coverage of teaching and learning, which while present in supporting detail, is not currently visible within the seven pillars. Given its centrality to quality in higher education, more explicit reference would help ensure balanced focus across process, input and outcome.

Question 13. To what extent do you agree with the proposed approach that includes structuring roles and responsibilities across each pillar?

Agree

Question 14. What approach to external quality assessment adds the most value in terms of maintaining and driving improvement?

An approach to external quality assessment that adds the most value combines cyclical, peer-led review with strong provider self-evaluation and a clear enhancement focus. This model, familiar in higher education, provides accountability while supporting improvement, enabling providers to reflect honestly and learn from sector practice.

Key features that drive improvement include:

- **Use of expert or peer-led external review** tailored to the context, can offer credible and constructive challenge. In higher education, this often includes trained academic and student reviewers, while in other parts of the tertiary system it may involve

inspectors, practitioners, or other relevant experts. The key is that externality is both context-sensitive and improvement-focused.

- **Consistency and transparency in published outcomes**, which build public confidence
- **Cross-sector applicability**, but with flexibility to reflect the diversity of provision
- **Integration with providers' own quality systems**, encouraging ownership and continuous enhancement
- **Alignment with international standards, where applicable**, and with key sector reference points adds value while maintaining both public and international confidence. In higher education this include the ESG, and the UK Quality Code, while for other parts of the sector, relevant national benchmarks and inspection frameworks may apply.

Such an approach avoids over-reliance on narrow metrics and instead promotes a culture of critical reflection and shared responsibility for quality.

Question 15. The Framework sets out a range of data sets in supporting assessments of compliance with the quality Framework. To what extent do you agree that the proposed data sources are appropriate?

Agree

Please note any other data that should be considered:

QAA agrees that the data categories outlined in Annex C (paragraph 57) provide a broadly appropriate foundation for supporting assessments of compliance with the Quality Framework. We welcome the emphasis on minimising burden through the use of existing data sources, and the commitment to contextualised interpretation, particularly as described in paragraph 60.

We encourage Medr to strengthen this section by explicitly referencing the importance of analysing data by relevant demographic, subject-level, and institutional context, in order to better reflect diversity across the tertiary sector. While this principle is alluded to, it could be made more explicit.

We also look forward to the future consultation on the definition of 'good' learner outcomes, which will be important in determining how data is interpreted in practice and how it informs regulatory judgments. QAA would welcome the opportunity to contribute to this work, drawing on our experience of quality review across diverse parts of the tertiary landscape and our understanding of key sector reference points.

Question 16. Are there any other priorities for consideration in relation to external quality assessment?

Yes

Please note any other considerations in relation to external quality assessment:

One important priority is ensuring that external quality assessment remains proportionate and risk-based, especially as the framework applies across a diverse tertiary landscape. A one-size-fits-all model may be administratively burdensome or duplicative for some providers, particularly those already subject to robust external oversight.

Additionally, clarity around the respective roles of Medr, Estyn, QAA, and other external bodies will be essential to avoid overlap and ensure that reviews are complementary, not conflicting. This should include consideration of how joint or aligned review activity might reduce burden while supporting coherence.

Finally, embedding learner and staff perspectives within external assessment processes, using methods suited to different parts of the sector, should remain a core feature of any model adopted, maintaining legitimacy and developmental value.

Question 17. The Framework sets out a range of data sets in supporting assessments of quality. To what extent do you agree that the proposed data sources are appropriate?

Agree

Question 18. Are there any other data that should be considered?

Yes

Please note any other data that should be considered:

While the proposed categories are appropriate, greater clarity on how academic standards, teaching quality, and student achievement might be supported through appropriate data would strengthen alignment with external reference points such as ESG 1.7 and the UK Quality Code.

Question 19. Does the section provide clarity on how Medr will intervene to address issues relating to quality, standards and continuous improvement?

No

What further clarification is needed?

While the framework outlines a range of mechanisms Medr may use including reportable events, assurance returns and information from third parties, it does not clearly define the thresholds or criteria for intervention in relation to quality, standards, or continuous improvement.

The distinction between supportive engagement and regulatory enforcement could be made more explicit, and further clarity on how issues identified through monitoring or external review feed into the decision to intervene would enhance transparency and sector confidence.

It would also be helpful to understand the extent to which peer review or provider-led improvement will feature in Medr's intervention model, particularly for higher education.

Question 20. Are there any gaps within the Framework that should be addressed?

Yes

Please note any gapes within the Framework:

While Annex 1 to the Quality Framework does provide helpful sector-specific context, including reference to ESG, the Quality Code, and TNE, QAA believes there are still several areas where the Framework could be strengthened:

- **Greater clarity on how sector-specific guidance will be operationalised**
Although the annex outlines key reference points for higher education, it is not yet clear how these will shape assessment processes in practice. For example, will ESG-aligned internal QA be considered sufficient for meeting the quality condition, or will Medr establish separate baseline expectations?
- **Integration between self-evaluation and regulatory action**
The Framework promotes provider-led self-evaluation, but it does not explain how these exercises will inform regulatory decisions or reduce the burden of external intervention. This limits the potential for a genuinely proportionate, trust-based model.
- **No structured approach to contextualising performance metrics**
While learner outcomes are a core pillar, the Framework does not outline how contextual factors (e.g. mode of delivery, subject mix, learner characteristics) will be factored into performance analysis. Without this, there is a risk of misinterpretation or over-simplification of outcome data.
- **Need for clear articulation of roles and collaboration between Medr and other quality bodies**
The Framework would benefit from explicitly outlining the distinct roles and responsibilities of Medr, QAA, Estyn and professional, statutory and regulatory bodies. Clarifying how these stakeholders will interact and collaborate with Medr will help streamline oversight, minimise duplication and provide assurance to providers managing multiple quality assurance relationships.
- **Limited visibility of provider engagement in developing review methodologies**
There is currently no indication of how Medr will involve the sector or students in shaping future external review approaches. A more co-productive model would help build confidence and ensure review methods are contextually appropriate and evidence-informed.

Question 21. Are there any particular elements within the current drafting that should be emphasised or strengthened?

Yes

Please note any particular elements within the current drafting that should be emphasised and strengthened:

While the Framework is broadly well-structured, QAA believes the following areas could be emphasised or developed further:

- **Clearer articulation of ‘continuous improvement’ in the context of higher**

education enhancement

We recognise that “continuous improvement” reflects the terminology of the TERA. However, in a higher education context, the concept of enhancement has a well-established meaning, with sector-led practices underpinning it in Wales and across the UK. The Framework would be strengthened by acknowledging this established approach and clarifying how the language of continuous improvement aligns with or encompasses enhancement activity.

- **Stronger positioning of provider-led self-evaluation and governance**
The Framework rightly promotes rigorous self-evaluation, but further emphasis could be given to the role of internal governance and quality assurance processes in managing risk and driving improvement. This would help signal a proportionate regulatory approach and build confidence in providers’ own systems.
- **Deeper integration of learner voice into governance and quality processes**
The inclusion of learner voice as a pillar is welcome, but the Framework could go further in articulating expectations for meaningful student representation in governance, quality review, and continuous improvement planning.
- **Enhance the prominence and explanation of Annex 1 as a key regulatory reference point**
Annex 1 contains important sector-specific frameworks, such as the ESG and the UK Quality Code, which are essential reference points for higher education providers. Greater emphasis and explanation within Annex 1 itself about what constitutes a regulatory reference point would help clarify expectations, while maintaining the accessibility and broad applicability of the main Framework document for the diverse tertiary sector audience. These should be more clearly referenced in the main body of the Framework, with a statement confirming that these are expected reference points for HE providers.
- **Clarifying how Medr will collaborate with quality bodies**
The Framework would benefit from more detail on how Medr intends to work with external quality bodies such as QAA and Estyn especially in areas where roles may intersect. Clear articulation of this collaborative approach will help avoid duplication and reinforce a coordinated quality assurance system for the tertiary sector.

Question 22. If you have any further comments you would like to share regarding the Quality Framework, please note:

QAA welcome the broad direction of travel set out in the Quality Framework and support many of its core principles, including the emphasis on learner outcomes, provider responsibility, and proportionate regulation. We also welcome the Framework’s broad alignment with quality approaches in other parts of the UK, which helps to support system-level coherence while respecting devolved responsibilities.

However, we would encourage Medr to consider the following points as the Framework is further developed:

- **Operational clarity on how quality will be assessed:** We welcome Medr’s commitment to working with QAA and Estyn to reduce duplication and ensure alignment across external quality assessments. QAA have already begun to develop strategic and operational relationship with Estyn to enable greater alignment, and we look forward to these relationships developing further. Building on this, there is an opportunity to articulate more clearly how the Quality Framework will interact with existing review arrangements. A coherent model that integrates these processes,

particularly for providers subject to multiple forms of external review will help minimise burden and reinforce mutual trust in shared standards.

- **Avoiding duplication through alignment with existing review processes:** There is an opportunity to more clearly define how Medr will engage with external quality bodies (e.g. QAA, Estyn) to ensure a coherent model that builds on rather than duplicates existing review processes. This is particularly important for providers subject to multiple external quality assessments.
- **Institution-led cyclical review with externality:** There would be benefit in considering the inclusion of institutional responsibility for cyclical disciplinary or subject-level review that includes external expertise. This would support meaningful self-evaluation, reinforce provider autonomy, and provide a credible foundation for external quality assurance. Such an approach would mirror effective practice in parts of the UK, including Scotland's institution-led review model, and could give real traction to the Framework's emphasis on self-evaluation and continuous improvement.
- **Building trust through co-development:** The effectiveness of the Framework will depend heavily on how it is implemented. We would encourage Medr to continue to adopt a co-productive approach with the sector in developing future review methodologies and associated guidance. This would help ensure that the Framework is both credible and workable in practice.
- **Supporting an enhancement-led culture:** We welcome the inclusion of continuous improvement as a pillar and statutory requirement and encourage Medr to explicitly acknowledge how this aligns with the enhancement-led approaches already embedded within higher education. This would help maintain coherence with established sector norms and support a positive culture of improvement. It also supports cross-nation dialogue on quality enhancement, enabling providers and quality bodies to share learning across the UK while retaining distinct national frameworks.
- **Long-term sustainability and capacity:** Finally, we encourage Medr to consider the resourcing and institutional capacity required to deliver against all aspects of the Framework

Question 23. Does this Annex take account of the key other documents and requirements for each part of the sector?

Yes

What further information is required?

Broadly, QAA believes that the Annex provides useful sector-specific references, particularly for higher education. We welcome the inclusion of key frameworks such as:

- The Frameworks for Higher Education Qualifications (FHEQ)
- The UK Quality Code for Higher Education
- Subject benchmark statements
- The European Standards and Guidelines (ESG)
- The QAA Quality Evaluation and Enhancement of UK Transnational Education (QE-TNE) scheme.

These references are appropriate and signal a degree of continuity with existing quality expectations across the UK and European Higher Education Areas.

However, we would recommend the following refinements to strengthen the Annex further:

1. Make the relationship between the Annex and the main Framework more explicit

The main body of the Quality Framework does not clearly direct readers to Annex 1. A clearer cross-reference, including an explanation that the sector-specific documents in the Annex are considered integral to compliance, would reduce ambiguity and reinforce their relevance.

2. Clarify the status of referenced documents (guidance vs. requirement)

It would be helpful to clarify which sector-specific documents are mandatory reference points versus those that are illustrative or advisory. For example, are providers expected to demonstrate compliance with the Quality Code, or is alignment sufficient?

3. Expand the Annex's coverage of other parts of the sector

While the HE section is well developed, the guidance for other tertiary education providers (e.g. adult learning, apprenticeships) is relatively limited. The Annex could be strengthened by identifying similarly authoritative reference points or regulatory documents relevant to these areas.

4. Update and maintain reference materials

We recommend establishing a process to ensure that the guidance documents referenced in the Annex are regularly reviewed and updated to reflect changes in national and international frameworks.

Question 24. Could the proposals be changed to increase positive effects, or decrease adverse effects on:

Opportunities for persons to use the Welsh language:

Yes

Please provide details:

By positioning Welsh language as an ongoing Condition of Registration and Condition of Funding, the proposals have the potential to strengthen opportunities for students to use the Welsh language. The proposals could be further strengthened by specifying the expectations of registered providers in relation to Welsh language; and bringing together the range of expectations suggested throughout the consultation documents in a way that more clearly supports Medr's strategic aim "To encourage greater use of the Welsh language, increasing demand for and participation in learning and assessment through the medium of Welsh." For instance, under Annex C – Criteria for Assessing the Quality of Education paragraph 20, it states that "Welsh language and bilingual considerations are embedded in each of the pillars"; however, it is only under the Learner Voice pillar (paragraph 28), Self-evaluation pillar (paragraph 36) and Professional Learning and Development pillar (paragraph 44) where specific considerations concerning Welsh-medium and bilingual provision are indicated.

Question 25. Could the proposals be changed to increase positive effects, or decrease adverse effects on:

Treating the Welsh language no less favourably than the English language?

Yes

Please provide details:

It is specified in Annex C paragraph 5 that “This framework... recognises that providers are expected to comply with a range of legislation and requirements, including... Welsh language standards”; it is not clear whether what is suggested here is that all providers will have to comply with the Welsh language standards whether or not they have been issued a Compliance Notice by the Welsh Language Commissioner (and, if so, which standards).

Question 26. Will the proposals contribute to the achievement of the national well-being goals set out in the Well-being of Future Generations Act 2015?

Yes

Please provide details:

The proposals have the potential to contribute meaningfully to the achievement of several national well-being goals set out in the Well-being of Future Generations Act 2015, particularly:

- **A prosperous Wales** – By embedding continuous improvement and a focus on learner outcomes, the framework supports high-quality tertiary education that can equip learners with the skills and knowledge needed for sustainable economic growth.
- **A more equal Wales** – The emphasis on learner voice, support for diverse learning needs, and use of data to address inequities in access and attainment directly contributes to tackling systemic disadvantage.
- **A Wales of vibrant culture and thriving Welsh language** – The integration of Welsh-medium and bilingual provision throughout the framework helps promote linguistic and cultural vitality across the tertiary system.
- **A resilient and healthier Wales** – The inclusion of learner and staff wellbeing as a regulatory focus recognises the importance of mental health and resilience as part of a sustainable education system.

By supporting inclusive, high-quality provision and system-wide enhancement, the proposals align well with the preventative, long-term and integrated ethos of the Act. Continued focus on implementation and impact will be essential to realising these benefits in practice.

Question 27. Do the proposals take account of the need to:

Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Equality Act 2010?

Yes

Advance equality of opportunity between persons who share a protected characteristic and persons who do not share it?

Yes

Foster good relations between persons who share a protected characteristic and persons who do not share it?

Yes

Reduce the inequalities of outcome which result from socio-economic disadvantage?

Yes

If you have any further comments on the impact of the proposed regulations on equality, diversity and inclusion, please note:

The proposals take positive steps to embed equality and inclusion, particularly through the focus on data-informed continuous improvement. They also show awareness of socio-economic disadvantage as a key dimension of inequity. To strengthen this further, we would welcome clearer expectations around intersectional analysis and co-creation with underrepresented learner groups in self-evaluation and enhancement activities.