

QAA Response to Welsh Government Consultation on the Registration of Higher Education Providers in Wales

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?

QAA does not have a position on maintaining the existing policy on tuition fee limits, as this falls outside our remit. However, we are fully committed to ensuring robust quality oversight across all higher education provision in Wales, regardless of funding arrangements. We defer to the Welsh Government and funding bodies on fee regulation and remain dedicated to working in partnership to ensure a high-quality, inclusive learning experience for all students.

Question 2. Do you agree that registration with Medr should be a prerequisite for the automatic designation of Welsh higher education courses for Welsh Government student support?

QAA supports the proposal that registration with Medr should be a prerequisite for the automatic designation of Welsh higher education courses for Welsh Government student support.

Linking automatic designation to registration provides clarity and consistency, ensuring that all providers whose students benefit from public support are subject to a coherent framework of regulatory oversight. This approach reduces complexity and ensures that all students accessing Welsh Government support, regardless of mode or level of study, are studying within a regulated and quality-assured environment.

Question 3. Do you agree 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?

QAA agrees with the proposal that higher education courses provided by OfS-registered providers should be automatically designated for the purpose of Welsh Government student support.

This ensures cross-border consistency and provides clarity for both students and providers. Since OfS-registered providers are already subject to regulatory oversight by OfS, it is appropriate that their courses be automatically eligible for Welsh Government student support.

Additionally, QAA welcomes the proposal to continue the arrangements that mean publicly funded providers in Scotland and Northern Ireland also have their courses automatically designated as eligible for Welsh Government student support, provided they are in receipt of public funding, ensuring equitable access for Welsh-domiciled students across the UK.

We also strongly encourage continued collaboration across nations, particularly in terms of

ensuring information is shared when policies or changes impact students or providers across borders. This will help maintain clarity, consistency, and ensure that students are not disadvantaged due to differing regulatory approaches in each nation.

Question 4. Do you agree with the proposal that the higher education courses provided by accredited school-based initial teacher training (ITT) providers should be automatically designated for the purpose of Welsh Government student support?

QAA does not have a direct role in the accreditation or designation of school-based initial teacher training (ITT) providers, and therefore we do not have a position on this proposal.

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?

QAA recognises the need for greater oversight and regulation of partnership provision and supports efforts to ensure that all providers benefiting from automatic designation for Welsh Government student support are operating within a regulated, quality-assured framework.

We believe, however, that effective regulation must also be proportionate, and we advocate for a holistic model of oversight grounded in the UK Quality Code for Higher Education. Specifically, Principle 8 and the associated Advice and Guidance on Partnerships make clear that the awarding organisation retains ultimate responsibility for the academic standards and quality of provision delivered within partnership arrangements.

The UK Quality Code for Higher Education, specifically Principle 8: Operating partnerships with other organisations, provides a clear, sector-agreed framework for the effective governance, monitoring, and quality assurance of collaborative provision. This includes expectations around due diligence, written agreements, risk management, and ongoing scrutiny of partnership arrangements.

We note the Welsh Government's intention to bring delivery partners more squarely within Medr's regulatory remit by requiring registration or funding status as a condition for automatic designation. While we understand the rationale for establishing a single regulatory gateway, we believe it is important to recognise that the existing external review system in Wales already provides assurance over the quality and governance of partnership provision, including the scrutiny of awarding providers' oversight arrangements.

This approach has already proven effective in Wales, for example, the 2025 Quality Enhancement Review of Wrexham University confirmed that external review mechanisms were identifying and enhancing collaborative provision in practice, including clear oversight of teach-out arrangements and risk-based scrutiny of partners.

We also encourage the Welsh Government to clarify the term "overall responsibility for the course" which remains undefined in the consultation. In practice, responsibility for the design and delivery of a course may be distributed across institutions, sometimes evenly. Without a clear definition, there is a risk of inconsistent interpretation and regulatory uncertainty.

From QAA's perspective, and in line with the UK Quality Code: Advice and Guidance on Partnerships, it is the provider that awards the qualification that should be understood to hold overall responsibility for the course. This reflects the principle that the awarding organisation retains ultimate accountability for the academic standards of its awards and for ensuring the

quality of the student learning experience, regardless of delivery arrangements.

QAA supports the principle that courses delivered on behalf of registered or publicly funded providers should only be automatically designated for Welsh Government student support where the delivery partner is also subject to appropriate oversight by the main provider. This ensures that the main provider, who retains ultimate responsibility for academic standards and quality assurance, maintains oversight of the partnership, in line with QAA's long-standing position on the assurance of collaborative provision.

However, we suggest that this principle should not be considered in isolation when it comes to quality assurance. It is essential that the main providers are externally quality reviewed through cyclical review processes to ensure that academic standards are maintained, and that the main provider is managing its partnership provision rigorously in order to safeguard the student experience. External cyclical reviews provide an important layer of independent oversight, ensuring that the quality of education remains consistent across different types of provision, including collaborative and franchised courses.

We welcome the opportunity this consultation presents to improve consistency and transparency in the regulation of franchised and validated provision. These arrangements are becoming increasingly diverse, extending well beyond FE colleges to include private providers and transnational education partners. We encourage Medr to ensure that the oversight framework is robust, flexible, and capable of handling this complexity, while still upholding the highest standards.

We welcome the broader policy intention to reduce regulatory burden and simplify designation through a single gateway. Ensuring that designation arrangements are proportionate, transparent, and responsive will support providers and protect student choice. QAA stands ready to work with Medr and the Welsh Government to support these aims and to ensure that quality is maintained wherever higher education is delivered.

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?

QAA does not anticipate any significant or unmanageable cost implications arising from the proposed approach to automatic course designation, provided the implementation is phased clearly and accompanied by appropriate planning.

QAA currently carry out external quality assurance across the full spectrum of higher education providers in Wales, including further education colleges, universities, and are therefore well-positioned to engage with the range of institutions likely to register with Medr.

However, we note that the introduction of a statutory register may lead to an increase in the number and diversity of providers subject to oversight, particularly if more providers seek registration to benefit from automatic designation. This could require additional planning in relation to:

- Reviewer capacity and sector expertise.
- Guidance, engagement and induction for newly registered providers.
- Initial assessment activity linked to transitional arrangements or new entrants.

These are manageable challenges, but early coordination with Medr will be essential to ensure sustainable and effective quality assurance. QAA remains committed to working constructively with Medr and the Welsh Government to manage these implications.

Question 7. Do you anticipate any cost savings for your organisation arising from the proposed approach to the automatic designation of higher education courses for Welsh Government student support?

QAA does not anticipate significant cost savings directly arising from the proposed approach.

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?

QAA does not have a specific view on the proposals' impact on persons with protected characteristics under the Equality Act 2010. However, we are committed to supporting inclusive practices across the higher education sector and ensuring that our quality assurance processes contribute to equitable access to higher education for all students.

Question 9. What, in your opinion, would be the likely effects of the proposals in this consultation on the Welsh language?

QAA does not have a specific view on the likely effects of the proposals on the Welsh language. However, as a public body, we are committed to upholding our responsibilities under the Welsh Language Standards and ensuring that our quality assurance processes align with these requirements to support equitable access to higher education for Welsh-speaking students.

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

- a) have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English, or**
- b) mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

QAA does not have a specific view on how the proposals could be formulated to have more positive effects on the Welsh language. However, as a public body, we are committed to upholding our responsibilities under the Welsh Language Standards and ensuring that our quality assurance processes reflect and support language equality in Welsh higher education.