

British Academy response to Medr's consultation on a new regulatory system (including conditions of registration and funding)

18th July 2025

Overview

Medr, the new regulatory body for tertiary education in Wales, is consulting on a new regulatory system, including conditions of registration and funding.

The British Academy welcomes the opportunity to respond to this consultation as part of our commitment to championing and strengthening the SHAPE disciplines (Social Sciences, Humanities and Arts for People and the Economy) across the UK. As such, we take a strong interest in the effective regulation of higher, further and technical education in Wales as in all four UK nations. While we hope our perspective on behalf of our disciplines will be useful, we recognise that education is a devolved matter and also recognise the important work of our colleagues at the Learned Society of Wales as a powerful voice for Welsh scholarship.

Some of the areas covered within the consultation go beyond the Academy's remit, including those concerned with specific aspects of the relationship between the regulator and individual providers. We have therefore prepared the following submission to directly address those areas of the consultation where the Academy is best equipped to respond.

Strengths of the proposed regulatory system

The British Academy is encouraged by many aspects of the proposed new regulatory system for Medr. This includes:

- **Recognition and commitment to addressing the financial challenges facing tertiary providers, including the current financial crisis facing Welsh universities.** Funding pressures will have an acute knock-on effect on learners, staff and the capacity of these institutions to best serve Wales economically, socially, intellectually and culturally. Encouraging transparency and dialogue between providers and the regulator (as seen in the section Our Expectations in Annex A, under ‘Transparency and Self-Reporting’) – particularly regarding institutions’ financial health - would be a positive step toward addressing these considerable challenges and ensuring good governance and financial management, so long as this is balanced with a commitment to minimising regulatory burden.
- **Emphasis on trust.** Lack of trust between the regulator and tertiary providers - a critique often levelled at the Office for Students in the English context - serves no-one.¹ As a new regulator, Medr has an important opportunity to positively set the tone of its ongoing relationship with the sector through its actions. Medr’s proposed Regulatory Approach sets out a prudent risk-based approach and plan for proactive dialogue between the regulator and providers.
- **Commitment to safeguarding research integrity, capacity and culture.** This is vital to supporting a healthy and thriving research ecosystem. Fair hiring and employment practices across all disciplines will also be important to achieve the stated regulatory objectives of nurturing inclusive research environments, growing internationally-acclaimed research and inspiring innovation.
- **Regulating in the interest of learners but also in the wider public interest.** While the needs of individual learners should of course be central to a successful regulatory approach, we are encouraged by Medr’s stated commitment to align with national priorities and expectations. The tertiary education system makes enormous contributions to the Welsh economy, providing vital skills and training for the workforce of tomorrow and vast social, cultural and civic benefit. We are glad to see Medr commit to enabling tertiary education providers to continue to contribute positively to the broader social and economic objectives of Wales.²
- **Clarity on alignment with external quality assurance standards.** Given the lack of a common regulatory and quality assurance system across the four UK nations, the confirmation in Medr’s proposed Quality Assessment Framework (Annex C) of Medr’s intention to pursue alignment with the UK Quality Code and the European Standards and Guidelines (ESG) is welcome. The Academy’s President, Professor Dame Julia Black, has repeatedly raised concerns around the situation in England, where the Office for Students’ non-alignment with ESG standards risks undermining international confidence in the quality of higher education provision.³ Medr’s commitment to align with both the UK

¹ House of Lords Industry and Regulatory Committee (2023), [*Must do better: the Office for Students and the looming crisis facing higher education*](#).

² Learned Society of Wales (n.d), [*Civic Engagement for Inclusive Innovation in Wales*](#).

³ Black, J. (2024), ‘Better regulation’. Universities UK (UUK), [*Opportunity, growth and partnership: A blueprint for change from the UK’s universities*](#);

Quality Code and the ESG is a welcome model for better alignment of regulatory frameworks across the UK.

- **Active regulation with support from the Welsh government.** The tertiary system will benefit from a regulator working closely with elected representatives - for example, in the provision of specified intervention powers for Welsh Ministers in the case of FE providers. As the Academy has previously outlined, we recognise the scale of challenges facing the FE system across the UK, including in Wales, and the need for engagement at all levels to tackle these challenges.⁴
- **Further collaboration across the tertiary system.** A more collaborative tertiary system, spanning further and higher education providers and employers, will provide welcome benefits and should be strongly encouraged in Wales. Medr's proposed Regulatory Framework (Annex B) encourages providers to 'consider the benefits of working in partnership... both locally and nationally'. This is a welcome aim, with broad positive benefits to institutions being pushed to collaborate across the tertiary system and beyond, particularly given current funding pressures in the sector. Regulating to encourage these connections throughout Wales can help support equality of opportunity and greater opportunities for life-long learning, as well as knowledge-sharing between institutions.
- **Promoting the Welsh language.** The Academy strongly supports the preservation and promotion of the UK's indigenous languages, including Welsh.⁵ While we welcome the ambition for the regulatory system to support increased access to Welsh medium provision throughout the tertiary system, steps need to be taken to maintain the health of Welsh and Celtic studies to enable this (see more below).
- **Acknowledging diversity of learner outcomes.** In Medr's Strategic Plan, there is a welcome acknowledgement that definitions of 'excellent learner outcomes' should not be fixed and should instead reflect the diversity of both different parts of the tertiary sector and individual learner circumstances. The Academy is further encouraged by Medr's commitment to focus on learner views of their experience of tertiary education. This is a vital consideration when we know that learners are motivated to study by a variety of factors, beyond just financial or employment considerations, and experience benefits of similar breadth. We are pleased to see that Medr is not proposing to measure outcomes based on progression to managerial or professional jobs at a census point of 15 months after graduation, as is the case in England. This is a flawed approach, representing a snapshot which fails to capture the diverse trajectories of graduates, who for a number of reasons may not enter roles in this category, especially early in their careers. Medr has an important opportunity, as a new regulator, to set out a broader approach to understanding learner outcomes (see more below).

Areas for further development

The British Academy wishes to raise four areas for further exploration as Medr develops its regulatory system in line with existing commitments as set out in its Strategic Plan:

⁴ The British Academy (2025), [Response to the Education Committee's call for evidence on Further Education and Skills](#).

⁵ The British Academy and University Council of Modern Languages (now the University Council for Languages) (2023), [DCMS inquiry on minority languages: A response by The British Academy and UCML convened Strategic Committee for Languages in Higher Education](#). The British Academy (2020), [Towards a National Languages Strategy](#).

- Monitoring subject-level provision at Welsh higher education providers;
- Strengthening research and innovation;
- Broadening definitions of positive learner outcomes;
- Promoting a global outlook for tertiary education in Wales.

As a regulator with oversight of both teaching and research activities in Welsh tertiary providers - at a time when both are under increasing pressure - there is a real opportunity for Medr to set the tone for the years ahead by taking seriously the challenges to both teaching and research in the tertiary system. Re-asserting the value of both teaching and research, and in particular the teaching-research nexus, would support Medr's strategic aims of ensuring high quality provision, skills and knowledge development for learners, while also helping to grow internationally-acclaimed research and innovation.⁶

Monitoring subject-level provision in Welsh universities

We welcome Medr's aim to create a tertiary system that 'allows all learners to acquire the skills and knowledge they need for a changing economy and society'. Yet there is strong evidence that ongoing course and departmental closures in Welsh universities - accelerating during the present financial crisis - are limiting what students can study in Wales, with serious consequences for both equality of opportunity and providers' ability to deliver the economic, social and cultural benefit that Wales needs.

In 2024, the British Academy launched a major piece of research, [Mapping SHAPE Provision](#), which uses interactive dashboards to monitor changes in provision in the SHAPE disciplines (Social Sciences, Humanities and Arts for People and the Economy) since 2011/12.⁷ This research looks particularly at mapping the emergence of cold spots in subject provision in Wales and other UK nations. The most recent data shows:

- **Students are losing access to key subjects in Welsh universities in the current financial crisis.** Cuts to provision - a symptom of both funding pressures and shifting patterns of student demand - are creating strong regional disparities in access to SHAPE subjects in Wales for many learners.⁸ Large parts of Wales now lack provision within a commutable distance in subjects including Linguistics, Anthropology, Theology and Classics, with learners forced to relocate considerable distances or study elsewhere in the UK to access their subject of choice.⁹
- **If trends continue, there could soon be no degree-level provision in Welsh and other Celtic languages offered at any Welsh university.** Despite commitments from across the tertiary sector to promoting the Welsh language, cuts to Welsh, along with other Celtic languages and area studies, and a 61% decrease in student numbers since 2011/12 leaves degree level provision in Welsh and Celtic studies in critical condition. The loss of degree-level provision will have a direct impact on already struggling teacher recruitment figures.¹⁰ It also risks reversing the trend of rising numbers of GCSE entries

⁶ The British Academy (2022), [The Teaching-Research Nexus: NUS Insights Student Survey](#); The British Academy (2022), [The Teaching-Research Nexus: Project Summary](#).

⁷ The British Academy (2025), [Mapping SHAPE Provision in UK Higher Education](#).

⁸ The *Mapping SHAPE* research uses HESA provider data from 2011/12 – 2023/24, using student numbers by Full Person Equivalent (FPE) for first-year first-degree UK-domiciled students ≤20 years old to show what students can study and where.

⁹ Our research uses a definition of commutable distance as ≤60km from a provider's main registered address, not including satellite campuses and/or remote provision.

¹⁰ The British Academy and UCFL (as UCML), (2023), [DCMS inquiry on minority languages](#), p.3.

in Welsh and undermining efforts to achieve one million Welsh speakers by 2050 (Cymraeg 2050).¹¹

- **Modern Foreign Languages are most at risk from cold spots in degree-level provision in Welsh universities.** We see steep declines in degree-level provision across all modern European languages. If trends continue, Wales is at risk of becoming a cold spot in French, German, Spanish and Italian. There is already no degree-level provision of African and Middle Eastern Languages (including Arabic), and minimal provision of Asian languages including Mandarin and Japanese. All these shortages will have critical impact on the linguistic skills of the workforce of tomorrow and risk undermining the ambitions of the Curriculum for Wales to increase multilingualism in Welsh schools and colleges. The loss of degree-level provision will also directly harm MFL teacher recruitment, which is already struggling in schools and colleges across Wales.¹²

We recognise there are restraints on Medr's capacity and autonomy to respond to course closures and declining provision in Welsh providers, including the Tertiary Education and Research (Wales) Act 2022's requirement that Medr does not prohibit or require the provision of certain courses at individual institutions. We also recognise that individual institutions' decisions to close courses may well reflect rational commercial decisions responding to shifting patterns of student demand in a challenging fiscal climate and that competition law complicates and, in some cases, limits how far providers in the same region can collaborate to ensure continued provision in a given area.

Yet the Tertiary Education and Research Act also requires the Welsh regulator to promote equality of opportunity, widen participation in HE from learners in under-represented groups, and to 'promote tertiary education and research in a way that contributes to the development of a sustainable and innovative economy in Wales'. Dozens of decisions to close courses at individual institutions quickly add up to a system issue in the aggregate. This will have real and negative consequences for learners and for universities' ability to best serve the public interest.

- **Cold spots limit student access, entrench inequality and increase the likelihood of either lower HE participation and/or 'brain drain'.** Loss of provision within a commutable distance is an access issue, with learners from disadvantaged backgrounds much more likely to study close to home either on campus or as commuter students. Decreased provision in a local area will have a disproportionate impact on these learners' ability to participate in HE, further entrenching low participation rates in Wales relative to other UK nations, while students with greater capacity to relocate will have to look to other UK universities to access these subjects.
- **Cuts to undergraduate teaching provision have a knock-on effect on research and innovation in Wales.** When courses are closed and departments shuttered, Wales risks losing a pipeline of future research talent in potential students and specialist staff which make up its vibrant and world-leading research base (see below).

¹¹ For figures on GCSE entries in Welsh as a first and second language, as well as Welsh Literature, see the British Academy's [SHAPE Indicators](#), interactive dashboards on qualification entries that form part of the Academy's SHAPE Observatory collecting data on the health of SHAPE disciplines in UK education.

¹² See for instance the British Academy (2023), [Languages Provision in UK Further Education](#), 16.

We were encouraged by the recent announcement of plans for Medr to review subject provision at Welsh universities, particularly plans to explore how policy interventions might be used to safeguard provision.¹³ It is essential, however, that this is not just a one-off review.

- **Mechanisms to monitor what students can study and where should be an established part of Medr’s regulatory approach in the coming years if universities are to continue to deliver for learners and for Wales.** Regulatory monitoring could take the following forms, such as the creation of an ‘at risk’ subject register and/or the allocation of premiums for strategically important or vulnerable subjects (SIVS) as has previously operated in the English context and which currently exist for Welsh-medium provision for Welsh full-time undergraduate provision.
- **To equip learners for the economy of tomorrow, Medr should use an expansive definition of ‘strategic importance’ that includes the SHAPE subjects.** In the Minister for Further and Higher Education’s written statement to the Senedd on 15th February 2025, the Minister suggested a need to consider where ‘interventions’ may be needed to support ‘strategically important subject areas... that are vital to the success of public services’. The Minister has recently provided an update that Medr will produce a report on subject provision in Wales in the autumn.¹⁴ Currently, through the expensive subjects premium and higher cost subjects premium, Medr provide additional funding for providers for subjects that cost more to teach, such as clinical medicine and conservatoire performance. The Academy believes there is merit in Medr exploring the option of additionally providing premium support for subjects that are strategically important to Wales. While this certainly should include vocational courses such as Nursing and Education, which support vital public services, we would also encourage an approach to ‘strategic importance’ that includes subjects that meet the demands of the modern Welsh economy, including those in the SHAPE disciplines. In 2023, 60% of graduates in Wales had studied SHAPE subjects, and a decline in SHAPE subject provision would have a deleterious impact on key sectors, particularly in the valuable services economy, that rely on the SHAPE graduates as a crucial part of their workforce.¹⁵

Strengthening research and innovation

The Academy welcomes the emphasis on research and innovation as an area of strategic importance. But in order for Medr’s role as a regulator for a thriving research and innovation system to be successful, it must consider how best to ensure sufficient funding is allocated to the sector to carry out world-leading research across the full range of disciplines, and particularly to the continued importance of quality related (QR) recurrent funding as part of this landscape, enabling ‘discovery’ research which can unlock future medium and long-term research benefits. Recurrent funding has an important role to play, particularly for SHAPE disciplines, as part of a dual support system for research.

- **QR funding plays a particularly important role in safeguarding the pipeline of new researchers** through training and development of early career researchers and

¹³ Vikki Howells (Minister for Further and Higher Education), ‘[Written Statement: Higher Education reform and additional funding for the sector.](#)’

¹⁴ Vikki Howells (Minister for Further and Higher Education), ‘[Written Statement: Welsh Universities Vice Chancellor Roundtable Meeting – Update.](#)’

¹⁵ The British Academy (2020), *Qualified for the Future: Quantifying demand for arts, humanities and social science skills*; British Academy (2025), [Understanding SHAPE Graduates.](#)

doctoral students. Recurrent funding such as QR also provides an important financial base which can encourage further investment from funding councils and private investors. QR funding also helps reduce pressures to source external funding for those disciplines with low research expenses – beyond those of researcher salaries and basic infrastructure – and where the most important resource to support research production is a researchers' time. Although not exclusively, this includes many SHAPE disciplines. Research and innovation in SHAPE disciplines improves wellbeing, drives economic growth and enhances our understanding of people and the society in which we live.

- **Research and innovation in SHAPE disciplines improves wellbeing, drives economic growth and enhances our understanding of people and the society in which we live.** Research across the breadth of disciplines, including opportunities for interdisciplinarity, will be essential to resolve the most complex and pressing challenges we face, as will the flexibility of funding required for rapid response and the freedom for researchers to take risks and meet new challenges and priorities – such as those seen during the COVID-19 pandemic.¹⁶

Broadening definitions of positive learner outcomes

The Academy strongly supports measures that look to broaden understandings of graduate outcomes beyond those narrowly focused on, for example, progression into professional and managerial jobs. Relying solely on these measures fails to capture the holistic benefits higher education provides for individual students, which generally include higher earnings and better job prospects, but also a range of social, cultural and personal benefits that cannot be captured by narrow financial metrics. While the Academy is encouraged by Medr's acknowledgement of the diversity of 'excellent learner outcomes', we would urge Medr to consider looking beyond the data outlined in the proposed Quality Assessment Framework (Annex C) to be considered in the assessment of provider quality, for the following reasons:

- **Current data used to assess outcomes is insufficient, particularly without considerable contextualisation.** There are concerns with over-relying on destinations, for example, as a measure of graduate success, particularly when measured based on traditional datasets which have a number of limitations. For example, survey-based measures, including the Graduate Outcomes Survey, capture a snapshot at a particular moment in a graduate's career (15 months after graduation), and do not reflect the varied and diverse career paths that many graduates take.¹⁷
- **SHAPE disciplines in particular are done a disservice by existing measures.** The Academy has previously argued that graduate outcomes measures used across the UK at the present time are particularly ill-suited to fully accounting for the career pathways of SHAPE graduates. For example, the disproportionately high number of SHAPE graduates working in public services, such as Education, which have experienced recent wage constraints, can lead to SHAPE graduates recording lower salaries, despite the vital role they play in socially valuable employment.¹⁸

We welcome Medr's commitment to consult further on its approach to defining 'good' learner outcomes and would appreciate the opportunity to continue further discussions with

¹⁶ Panayotopoulos-Tsiros, D., Garling, O., Marks, R., Alexandrova, A., Coyle, D., Kenny, M., (2025), [Measuring Social and Cultural Infrastructure](#), The Bennet Institute.

¹⁷ The British Academy (2025), [Understanding SHAPE Graduates](#).

¹⁸ The British Academy (2025), [Measuring SHAPE Graduate Outcomes](#), in [Understanding SHAPE Graduates](#).

Medr on how to construct indicators which capture the full range of positive outcomes in tertiary education more broadly.

Promoting a global outlook for tertiary education in Wales

The Academy welcomes Medr's commitment in its strategic aims to promote globally-minded research and innovation and to ensure staff and learners are aware of opportunities to study, train, volunteer and work globally, all of which will contribute to building a more globally-responsible and internationally-competitive tertiary sector. The proposed regulatory system could benefit from aiming to clearly fulfil all of the key strategic duties set out in the Tertiary Education and Research (Wales) Act 2022, including the duty to '[promote] a global outlook'. This could be achieved by:

- **Ensuring reciprocity of opportunities for study abroad programmes for both incoming and outgoing students and researchers through Taith.** We were encouraged to see the recent renewal of Taith funding until 2028 and hope to see Taith go from strength to strength, with sustained and medium-term funding to develop research collaboration, champion language learning and create opportunities for Welsh and international participants. Taith is an important and ambitious model of a mobility scheme for the Welsh tertiary sector, particularly given its opportunities for strong reciprocal arrangements and mobility at all stages of the education system, as well as for researcher mobility, one which the tertiary regulator could work to strengthen and protect, working with providers and government. Study abroad opportunities are highly beneficial for those young people able to take part, enhancing employability, transferable skills and enabling networking, while also building core language proficiency.¹⁹
- **Informing and incentivising learners to pursue international mobility through Taith, despite ongoing conversations about a UK-EU youth mobility scheme and the future of the UK's place in Erasmus+.** We are keenly aware that we still lack clarity about the terms of a proposed UK-EU mobility scheme and/or timelines for the UK rejoining Erasmus+, although we welcome the recent agreement to work towards both of these goals. The recent cut to strategic allocation funding for study abroad programmes from the Office for Students in the English context suggests a lack of prioritisation for mobility opportunities, while the non-reciprocal nature of the Turing scheme continues to blunt the scheme's impact and utility for learners. We therefore encourage Medr to continue to support learners to access valuable international mobility experiences through Taith as a valuable and ambitious model supporting Welsh learner and researcher mobility, even as conversations about other mobility schemes progress in addition.
- **Promoting the benefits to Wales of increased researcher mobility.** We would encourage Medr, alongside the Welsh Government, to highlight the benefits that Wales can derive from supporting both inward and outward researcher mobility. This is particularly important at a time when UK-wide there is an opportunity, given the flux in the wider international situation, to attract researchers from across the world.
- **Exploring the revival of the Sêr Cymru, ensuring that it provides support for research across all disciplines, including SHAPE and STEM.** While recognising the significant impact Sêr Cymru has had in bringing scientific talent into Wales, the Academy has long argued for increased emphasis on the inclusion of the SHAPE

¹⁹ The British Academy (2023), [The Turing Scheme: Understanding Impacts and Implications](#), p.7.

disciplines in international collaborative research programmes, such as Horizon Europe.²⁰ The internationally-recognised strength of the arts, humanities and social sciences across the entire UK represents a powerful strategic advantage, including, in the research system, as a vital partner to STEM research and at the heart of the UK's global reputation for research excellence.²¹

²⁰ The British Academy (2024), [Response to the interim evaluation of Horizon Europe](#).

²¹ Draux, H., Fane, B., Hook, D. W., Wastl, J., Lewis, P., Jones, M. M., Roblero P., & Wilsdon, J. R. (2025), [Understanding the importance of SHAPE to the UK research ecosystem](#), *arXiv preprint arXiv:2501.16701*.