

Arolygiaeth Ei Fawrhydi dros Addysg a Hyfforddiant yng Nghymru His Majesty's Inspectorate for Education and Training in Wales

Ymateb i Ymgynghoriad / Consultation Response

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Background information about Estyn

Estyn is the Office of His Majesty's Inspectorate for Education and Training in Wales. As a Crown body, we are independent of the Welsh Government.

Our principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000¹ and the Education Act 2005. In exercising its functions, we must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by those receiving education and training in Wales;
- Quality of leadership and management of those education and training providers, including whether the financial resources made available to those providing education and training are managed efficiently and used in a way which provides value for money;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Our remit includes (but is not exclusive to) nurseries and non-maintained settings, primary, secondary, special and all age schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and initial teacher training.

We may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, we have set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

¹ This act to be replaced by the Tertiary Education and Research (Wales) Act 2022 when the quality provisions are commenced.

This response is not confidential.

Response

Introduction

Overall, Estyn's view is that the objectives within this draft strategic plan are appropriate and should enable Medr to fulfil its eleven strategic duties. The strategic aims also align well with most of the statement of strategic priorities for tertiary education and research and innovation issued by the Welsh Government.

As outlined throughout our response, Estyn, through our ongoing cycle of inspection activity, link inspections and thematic reviews in the tertiary sector, can offer key insights for Medr into the current state of the nation i.e. what is working well and what needs to be improved to enhance the learner experience. We can also offer insights into other post-16 provision that does not sit under the scope of Medr but will also be important in helping achieve its strategic objectives, as well as insights from our work pre-16 in terms of supporting any work on transition.

We have outlined what we believe to be the key current priorities for learners and providers and would agree that broadly this plan represents those priorities and balances them sufficiently with Medr's other legislative duties.

The founding and growth commitments seem to be correct across the foundation aim and five strategic aims, and the level of ambition plan is suitable and realistic in ensuring a smooth transition with minimal disruption for providers, learners and key stakeholders. As Medr matures and develops, opportunities to expedite objectives, particularly growth commitments should be regularly considered and negotiated with the tertiary sector.

The key area that Medr may want to consider giving more emphasis is in relation to the tertiary education workforce that will be necessary to support Medr in delivery this ambitious plan. The plan makes little reference as to how Medr will ensure that the tertiary education workforce are capable of delivering and have access to appropriate continuous professional development in order to support the delivery, for example, of excellent standards and high aspirations. The lack of appropriate workforce is currently a barrier, for example, in encouraging greater use of the Welsh language.

As with all strategic plans, the key will be the efficacy of the operational detail that sits beneath each of the strategic objectives. It is those operational objectives and measures that should inform how the tertiary sector will need to collaborate to work towards.

We look forward to supporting Medr, and other partners, in delivering the commitments of this plan.

Consultation questions

Part One: legislative duties & evidence

- 1. The Tertiary Education and Research (Wales) Act 2022 places eleven strategic duties on Medr to:
 - 1. Promote lifelong learning
 - 2. Promote equality of opportunity

- 3. Encourage participation in tertiary education
- 4. Promote continuous improvement in tertiary education
- 5. Promote of research and innovation
- 6. Promote collaboration and coherence in tertiary education and research
- 7. Contribute to a sustainable and innovative economy
- 8. Promote tertiary education through the medium of Welsh
- 9. Promote a civic mission
- 10. Promote a global outlook
- 11. Promote collaboration between providers of tertiary education and trade unions

To what extent do you agree that the Plan enables us to fulfil our duties?

Strongly agree / Agree / Disagree / Strongly disagree.

Are there any duties that are under-represented in the Plan?

Yes / No. Please provide details.

Broadly the plan should enable Medr to fulfil its eleven strategic duties.

The strategic aims cover collaboration with providers and partners across tertiary education but do not specifically mention partnerships with trade unions. Given that the legislative duty (11) specifically references collaboration between providers and trade unions, this might be an underrepresented area.

Underpinning the duty to Promote continuous improvement in tertiary education, there is an expectation to consider workforce. The key area that Medr may want to consider giving more emphasis is in relation to the tertiary education workforce that will be necessary to support Medr in delivery this ambitious plan. The plan makes little reference as to how Medr will ensure that the tertiary education workforce are capable of delivering and have access to appropriate continuous professional development in order to support the delivery, for example, of excellent standards and high aspirations. The lack of appropriate workforce is currently a barrier, for example, in encouraging greater use of the Welsh language.

- Our Plan needs to respond to the <u>statement of strategic priorities for tertiary</u> <u>education and research and innovation</u> issued to us by the Welsh Government. The five priorities are:
 - Develop a tertiary system that prepares learners for a dynamic and changing economy where all can acquire the skills and knowledge they need to succeed in life and work.
 - 2. Maintain and enhance the quality of the tertiary system, continue and intensify work on widening participation and take steps to ensure a more equitable and excellent system for all.

- 3. Putting the learner at the heart of the system by focusing on the experience of learners in the tertiary system and their wellbeing.
- 4. Ensure that the tertiary education system contributes to the economy and society.
- 5. Establish the Commission for Tertiary Education and Research as a highly effective organisation providing stability and leadership during this time of transition.

Does the Plan sufficiently address all of these priorities?

Yes / No / Partially.

If no or partially, please provide details of how could it better respond to them.

Overall, the strategic aims align well with most of the strategic priorities, particularly those related to widening participation, ensuring equity and quality in the system and contributing to the economy and society.

The learner voice and experience sits at the heart of all Estyn's inspection and thematic work, as well as our link inspector visits to local authorities and to post-16 providers of further education, apprenticeships, and adult learning in the community. In focussing on putting the learner and their experiences at the heart of the tertiary system and the strategic aims in this plan, Estyn can be a key collaborative partner to Medr in developing the strategic aims into operational outcomes for learners.

As already identified, the plan could be strengthened by also recognising the key role that the tertiary education workforce will have in delivery of the plan.

- 3. Does the Plan take account of the need to:
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the <u>Equality Act 2010</u>;

Yes / No / Partially. Please provide details.

Strategic aim 1 broadly addresses the need to comply with the Equality Act 2010 by promoting equal opportunities and fostering an inclusive environment

 advance equality of opportunity between persons who share a protected characteristic² and persons who do not share it;

²Protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

Yes / No / Partially. Please provide details.

Strategic Aim 1 is the main driver in advancing equality of opportunity, and it appears to broadly support this requirement

• foster good relations between persons who share a protected characteristic and persons who do not share it:

Yes / No / Partially. Please provide details.

Broadly strategic aim 1 aligns with fostering good relations between people who share a protected characteristic and those who do not. The underpinning operational detail will need to outline how Medr will enable the fostering of good relations by creating shared experiences, encouraging collaboration, and addressing common societal goals.

reduce the inequalities of outcome which result from socio-economic disadvantage³?

Yes / No / Partially. Please provide details.

Strategic aim 1 broadly addresses the need to reduce the inequalities of outcome resulting from socio-economic disadvantage. Medr will need to consider what data it may need to collect to help understand whether they have an impact on this aspect.

4. Will the Plan contribute to the achievement of the national <u>well-being goals</u> set out in the Well-being of Future Generations Act 2015?

Yes / No / Partially. Please provide details.

The strategic aims largely align with the national well-being goals set out in the Wales Well-being of Future Generations Act 2015.

5. Are the aims and commitments in the Plan in accordance with the <u>sustainable</u> <u>development principle</u>?

³ Socio-economic disadvantage is defined as: 'living in less favourable social and economic circumstances than others in the same society'. Experiencing socio-economic disadvantage may include some or all of the following:

[•] living in a deprived area;

[•] having little or no savings;

[•] having little or no income; and/or • experiencing material deprivation (that is, lacking the things which most people would say are needed for an acceptable standard of living – such as the ability to replace worn-out furniture or to afford adequate heating).

Yes / No / Partially. Please provide details.

The aims and commitments align with the sustainable development principle.

6. In drafting this Plan, we have taken into account a wide range of evidence from published reports and statistics, including the Welsh Government's 'Our National Mission – high standards and aspirations for all', 'Cymraeg 2050 – a million Welsh speakers' and the Wellbeing of Future Generations Commissioner's strategy for 2023-2050: 'Cymru Can'.

Is there any additional evidence we need to reflect in the Plan?

Yes / No. Please provide details.

The data sources identified are valuable sources of evidence for Medr in drafting this plan. In addition, given that the experience of learners is at the heart of the plan, qualitative evidence of what is happening on the ground at provider level will also be a valuable source of evidence for Medr, both in developing the strategic aims and in developing the 'how' operational plans that will sit underneath each of them.

Estyn, through our ongoing cycle of inspection activity, thematic reviews and link inspector visits, can offer insights into the current state of the nation, such as what is working well and what needs to be improved to enhance the learner experience. In the absence of a national learner survey across FE, ALC, school sixth forms and apprenticeships, the national outcomes of the learner surveys used during inspections may be a helpful additional evidence source.

Other examples of evidence that Medr could use in developing this plan and subsequent operational plans would include:

• Estyn annual report⁴

Estyn's annual report sets out how well each sector in Wales is performing, and also evaluates education and training in the context of a range of cross-cutting key themes:

Within the annual report are sector-based summaries which outline what is working well and what needs to be improved in the following sectors within the tertiary landscape:

- Further Education
- Apprenticeships
- Adult Learning in the Community
- Local government education services
- Secondary schools

Sector-based summaries for other post-16 sectors that do not form part of Medr regulatory control but have a key collaborative part to play in meeting many of the strategic aims would include:

⁴ https://estyn.gov.wales/annual-report/

- Jobs Growth Wales+ employability programme Independent Specialist Colleges
- Welsh for adults
 - Initial Teacher Education (ITE)
 - Support for Welsh in ITE

We have recently published thematic reviews that would be a useful source of evidence for Medr in developing the plan Examples of these include:

- Peer-on-peer sexual harassment among 16-18 year olds in FE⁵
- Delivery of Essential Skills Wales qualifications in apprenticeship programmes⁶
- Education and support for refugees and asylum seekers ⁷
- Review of the current 16-19 curriculum in Wales⁸
- Post-16 partnerships: shared planning and provision between schools, and between schools and colleges⁹

Through our annual link visits to providers of tertiary education, we are also able to provide a national insight into a particular area of priority for learners and providers in Wales. During our link visits to FE colleges in 2023/24, we focussed on how well colleges were responding to the implementation of the Additional Learning Needs and Educational Tribunal (Wales) Act (ALNET)

• ALN insights report¹⁰

We look forward to working closely with Medr in collaboratively agreeing the best use of future thematic and insights activity in helping inform and achieve the strategic aims within the plan.

7. Do you foresee any unintended consequences or negative impacts resulting from the Plan?

Yes / No. Please provide details.

The underpinning detail on how these objectives will be met will be important to clarify how providers and collaborative partners can achieve the objectives outlined.

Part Two: Aims, Priorities and Opportunities

⁵ https://annual-report.estyn.gov.wales/2023/peer-on-peer-sexual-harassment-among-1618yearold-learners-in-further-education/

⁶ https://annual-report.estyn.gov.wales/2023/delivery-of-essential-skills-wales-qualifications-in-apprenticeship-programmes/

 ⁷ https://annual-report.estyn.gov.wales/2023/education-and-support-for-refugees-and-asylum-seekers/
8 https://estyn.gov.wales/system/files/2022-10/A%20review%20of%20the%20current%2016 19%20curriculum%20in%20Wales 0.pdf

⁹ https://estyn.gov.wales/system/files/2022-01/Post-16%20partnerships%20en.pdf

¹⁰ Additional Learning Needs in Further Education Colleges - Estyn

8. Medr's vision states that we will work in close collaboration with our partners to enable a tertiary education and research system which is centred around the needs of learners, society and the economy with excellence, equality and engagement at its heart.

Do the strategic aims in the Plan enable us to deliver on our vision?

Yes / No / Partially.

If no or partially, please provide details of how the Plan could better enable us to deliver on our vision. In your response, please consider the role your organisation would play in the realisation of our aims.

9. Within each of the strategic aims in the Plan, there are founding commitments to be achieved within the first two years, and growth commitments to be developed over five years.

Considering each of the strategic aims, are the founding and growth commitments correct?

Yes / No / **Partially**. Please provide details.

Broadly the founding and growth commitments seem to be appropriate across the Foundation Aim and five Strategic Aims:

Foundation Aim

We agree that the foundation and growth commitments within this aim are appropriate. It is interesting to see as a growth commitment that Medr will be looking for providers to take responsibility for their own performance and improvement strategies. As part of our activities in the post-16 sector, we continue to see too many examples of ineffective self-evaluation and improvement planning, we would therefore be keen to explore the role we can play in supporting this objective.

Strategic aim 1

We agree that the foundation and growth commitments within Strategic aim 1 are appropriate.

The voice and experience of learners is at the heart of all Estyn's sector inspection frameworks. In collaboration with Medr and other partners, we can support the achievement of the foundation and growth aims through our inspection and thematic work.

We welcome the commitment to encouraging participation at all stages of lifelong learning in a context where adult participation in Wales is the lowest of all the UK nations. Through our inspection and link activities with adult learning in the community partnerships across Wales, we can offer key insights and support shaping how the future of adult learning looks in Wales in a wider tertiary offer. In delivering an aim to reduce the high percentage of those aged 16-18 and 19-24 in Wales that are not in employment, education or training (NEET), it will be important for Medr to retain close collaboration with other employability programmes that do not fall within its scope. The Jobs Growth Wales+ (JGW+) programme is a key driver for reducing unemployment rates in young people across Wales. Estyn has previously undertaken monitoring activity of providers during the first year of the programme¹¹, with a further review of the programme taking place through the 24/25 contract year. Therefore we can offer Medr key insights into how the JGW+ programme is operating and how connected the programme is with providers of tertiary education.

We welcome the commitment to developing a common framework for mental health and wellbeing. The proportion of young people reporting issues with anxiety and mental health was growing before the pandemic and remains a priority for providers across the tertiary sectors. The regulatory conditions that support staff and learner welfare to be equitable across all tertiary education provision is also welcomed. This support should be available to all, regardless of when and where learners access their learning.

Strategic Aim 2

We agree that the foundation and growth commitments within strategic aim 2 seem to be appropriate.

The importance the plan places on collaboration is encouraging when developing coherent learning pathways. There are areas of the tertiary sector where provision is still delivered in competitive silos, with little clarity for learners on the pathways available to them. As well as ensuring that providers collaborate to align provision and develop transparent pathways for learners, there is the need to also ensure learners at any stage of the learning journey, have access to effective independent, advice and guidance. Whilst the plan does mention the need to promote careers, advice and guidance, it may be beneficial for Medr go further in exploring making this a mandate for all tertiary providers.

We agree that basic skills are the foundation for a productive workforce and welcome the growth commitment to review basic skills provision across the tertiary landscape. We recently published a thematic review into the Delivery of Essential Skills Wales qualifications in apprenticeship programmes and are also this year undertaking a thematic review into basic skills in adult learning in the community.

We would welcome the opportunity to work with Medr and other partners on shaping the future of apprenticeship programmes in Wales. We currently inspect an appropriate breadth of provision across our apprenticeship inspections that include prime contractors, delivery partners and subcontractors. Whatever the landscape of apprenticeship funding looks like moving forward, we can support Medr in the commitment of ensuring rigorous standards and occupational competence. We would also welcome working with Medr and other partners to consider how a more cohesive approach to delivery of apprenticeships at all levels, including degree apprenticeships, can be achieved in the interests of developing coherent learning pathways.

Engagement with employers is crucial to identify and understand future skills requirements. Through our inspection and thematic work, we can support Medr in gaining a nationwide picture of developments in key priority areas such as artificial intelligence or green technologies. It is important that in engagement with Medr and representative bodies/networks, employers also understand their commitments in supporting learners in

¹¹ https://estyn.gov.wales/system/files/2024-

^{02/}Jobs%20Growth%20Wales%2B%20youth%20programme%20-%20autumn%202023%20insights.pdf

the tertiary sectors to develop the skills needed to contribute to the economy and society. Our inspections of apprenticeship providers since the COVID-19 pandemic, as outlined in our annual report sector summary¹² for 23/24. have highlighted a concerning theme of employers – particularly in the health and social care sector – of not honouring their contractual duties to allow apprentices time to attend off-the-job training and assessment activities.

Strategic aim 3

We agree that the foundation and growth aims within strategic aim 2 seem to be appropriate. However, we would welcome a reference to the key role that the tertiary education workforce would play in delivering this aim.

We welcome the focus and commitment to continuous improvement in both the foundation and growth aims of this strategic objective. We are committed to our quality assurance responsibilities and playing a key role in the continual improvement of education and training in Wales. As such we can operate as a key partner in helping Medr achieve its aims to determine quality assessment arrangements and ambitious performance indicators. We can also help identify and share best practice across the tertiary sector through our inspection reports, case studies and thematic work. A number of other organisations are mentioned in the plan, for example Coleg Cymraeg Cenedlaethol. Would it be appropriate to refer to the role Estyn would play in helping to deliver on the strategic aim?

It seems appropriate that any performance-based funding models are gradually introduced to allow for a smooth transition and minimal disruption to learning. Where funding methods are developed to influence continuous improvement, as where regulatory powers are used to influence funding, we will be keen to collaborate with Medr on the systems and processes that would occur following inspection activity that identifies significant underperformance at provider level such as where providers are undertaking ongoing follow–up activity.

We welcome the focus on promoting excellent standards. Sharing the most effective practice and raising the collective benchmark will be key in achieving this. Through our work, we can highlight and share spotlights on effective practice and more detailed case studies to support this aim. We would welcome the opportunity to deliver practice focused conferences for the tertiary education workforce as a vehicle to support delivery of this strategic aim.

Strategic aim 4

We agree that the foundation and growth aims within strategic aim 4 seem to be appropriate.

Strategic aim 5

We agree that the foundation and growth aims within strategic aim 4 seem to be appropriate.

We welcome the commitment to encourage greater use of the Welsh language as a strategic aim in this plan and look forward to working in collaboration with Medr and other partners to help develop the national strategy over the next two years. Across further education and apprenticeships provision, very few learners undertake any written work in Welsh. There are also limited opportunities through adult learning in the community for learners to access Welsh-medium courses or to develop their Welsh language skills. Leaders across the sectors face significant ongoing challenges in the recruitment of

¹² https://annual-report.estyn.gov.wales/2024-1/work-based-learning/

suitably skilled staff who can work through the medium of Welsh. This problem is exacerbated by too few students enrolling to train as secondary school teachers, particularly through the medium of Welsh. The workforce will be key in delivering this objective, and we would expect to see Medr working with the National Centre for Learning Welsh as well as Coleg Cymraeg Cendlaethol to dive forward work to deliver this aim. Our current thematic review of the work of Coleg Cymraeg Cendlaethol will provide valuable evidence to help to shape future actions to deliver this aim.

10. What are the key priorities for current and future **learners** in the tertiary education and research sector in Wales?

Are these sufficiently reflected in the Plan?

Yes / No / Partially. Please provide details.

In your response, please consider whether the Plan sufficiently balances these priorities alongside the other duties (as outlined in part one) placed on us.

Overall, the plan broadly represents the key priorities for learners over the next five years and sufficiently balances these priorities with its other legislative duties. Examples of the priorities for learners would be:

- **Mental health and wellbeing.** The support for learners reporting issues with anxiety and mental health remains a key priority for learners.
- **Development of Welsh language skills**. Across post 16 provision, very few learners undertake any written work in Welsh. There are also limited opportunities for learners to access Welsh-medium courses or to develop their Welsh language skills.
- Learner attendance remains weaker than pre-pandemic norms. There is no reference to learner attendance in the strategic plan, however, learner participation rates could broadly cover this key priority.
- Learners' basic skills, particularly numeracy skills are less well developed than similar cohorts prior to the pandemic. Learners need to be able to access basic skills provision in a meaningful, contextualised way that will engage and motivate them to develop their skills alongside other qualifications and aims.
- Learner outcomes in key vocational sectors remain significantly below prepandemic levels.
- Access to clear and transparent pathways of learning which are easy to navigate with exit and entry points at all levels. Alongside these pathways, all current and future learners will need access to effective, informed and independent careers advice and guidance that is tailored around the needs of the learner and nothing else.
- 11. What are the key priorities for tertiary education **providers** in Wales in the next five years?

Are these sufficiently reflected in the Plan?

Yes / No / Partially. Please provide details.

In your response, please consider whether the Plan sufficiently balances these priorities alongside the other duties (as outlined in part one) placed on us.

Overall, the plan broadly represents the key priorities for providers over the next five years and sufficiently balances these priorities with its other legislative duties. Examples of the priorities for providers would be:

- The proportion of young people reporting issues with anxiety and mental health remains a priority and a significant challenge for providers. It is therefore welcome that a foundation aim is the development of a framework for mental health and wellbeing.
- Estyn continues to see too many examples of ineffective **self-evaluation and continuous improvement planning across post-16 providers**. It is vital that providers make sure that their work always adds value. They should have a clear understanding of what is working well and should prioritise improving teaching, training and learning to secure the best possible outcomes for learners. Whilst a smooth transition phase is welcomed for providers to avoid disruption, Medr should consider how effectively providers are able to self-evaluate and regulate and the role Estyn and other partners can play in supporting this.
- Effective support for learners, including for those with identified additional learning needs (ALN), continues to be a high priority for providers. Whilst the plan does support inclusivity and equity of opportunity for all, given that the relatively recent implantation of the Additional Learning Needs and Educational Tribunal (Wales) Act (ALNET), greater emphasis could have been placed in the plan on how providers will respond and support learners that have an ALN.
- The access to impartial careers advice, information and guidance that prospective learners receive is not always clear and consistently useful. There remains a need to develop the way that the broad range of provision available across the post-16 sectors in Wales is matched to individual learners. It can be difficult for learners to view and understand the full range of options available to them.
- Learners' basic skills, particularly numeracy skills remain less well developed than those of similar cohorts before the pandemic. Across the post-16 sectors, providers' approaches to the development of learners' literacy and numeracy skills do not take sufficient advantage of the vocational contexts and interests of learners. This can be demotivating for learners and limit the progress that they make. The makeup of external Essential Skills Wales assessments, as reported in our recent thematic review, has compounded this issue.
- 12. What are the biggest opportunities of having a single body responsible for oversight of the whole tertiary sector?

In your response, please consider whether the Plan enables us to make the most of these opportunities, or how we could do this better.

We see a valuable opportunity of having a single body responsible for oversight of the whole tertiary sector with the potential for a more joined-up and inclusive sector, with clear pathways for learners. The plan broadly enables Medr to achieve that opportunity at a strategic level. However, it will be the finer detail and plans that sit beneath each commitment that will be needed to ensure that the sector works together in collaborating towards common goals.

13. Medr has a duty to promote collaboration throughout the tertiary education and research sector.

To what extent does the Plan enable us to make the most of opportunities to collaborate?

Fully / Moderately / Slightly / Not at all. Please provide details.

Partnership working is explicit throughout the strategic plan and in each of the six aims that are presented. Other than a very few named partners i.e. Coleg Cymraeg Cenedlaethol, each of the aims outlines the need to 'work with partners'. At a high level, the plan would allow Medr to achieve its vision.

It is worth noting that collaboration will also need to extend beyond the scope of Medr in the tertiary sector to align with other post-16 provision that will remain funded and overseen by Welsh Government: for high needs learners in independent specialist colleges, post-16 learners in maintained special schools or PRUs, Jobs Growth Wales+ youth employability programme, youth justice and adult learners in prisons (learning in the justice sector, with HMI Prisons and Probation) and Welsh for Adults provision.

14. We need to be ambitious about what we can achieve. However, the financial environment we are working in is challenging. We also recognise the establishment of Medr is a significant change for the sector and we are committed to ensuring a smooth transition.

Considering the context we are working in, to what extent is the level of ambition in the Plan suitable?

Fully / Moderately / Slightly / Not at all. Please provide details.

Considering the current context of the tertiary education system in Wales, we agree that the ambition in the plan is suitable and realistic in ensuring a smooth transition with minimal disruption for providers, learners, partners and other key stakeholders. This plan should however be regularly reviewed and, as Medr matures and develops, opportunities to expedite objectives, particularly growth commitments should be regularly considered and negotiated with the sector.

Part Three: Our Ambitions

15. Please consider the ambitions on page 4 of the Plan.

a) To what extent do you agree with our long-term ambitions for success?

Fully / Moderately / Slightly / Not at all. Please provide details.

b) What changes are required in the sector to achieve these long-term ambitions? Please provide details and examples.

To create coherent learning pathways, all parts the tertiary sector will need to work in partnership to design and develop clear, transparent routes of learning that are easily accessible and understandable. Within the current system of tertiary education, there is still a level of competition for market share that could be seen as a barrier to authentic collaboration and partnership working. An example of this could be the coherence between degree apprenticeships and core apprenticeship programmes. In the current state, one network of providers delivers foundation apprenticeships (level 2), apprenticeships (level 3) and higher apprenticeships (level 4/5) whilst a separate network delivers degree apprenticeships (level 6). The structure of degree apprenticeships is such that in the formative years of degree apprenticeship programmes, learners are working at levels 4/5, there is therefore the potential for competition for learners at level 4/5 for either degree apprenticeship programmes or higher apprenticeship programmes. This is one of potentially many examples across the sector where competition for funding could be a hindrance to true partnership working and coherent learning pathways. Medr, in consulting on a system of funding that enables clear pathways, will need to review where these exist and look to remove those competitive barriers as far as possible in the future design of programmes.

c) How will we be able to measure success against these ambitions? Please provide details.

Examples of measures that could be used to measure success against the longerterm ambitions would be:

- Learner experience feedback
- Learner attainment and progression rates
- Participation, achievement and progression rates for underrepresented groups
- External reviews and inspections i.e. Estyn/QAA
- Social mobility and value-added measures
- Welsh language and development rates (contribution against 1 million by 2050)

Part Four: Welsh Language

16. Does the Plan appropriately reflect the Welsh Government's ambition to increase the number of Welsh speakers and increase the use of the Welsh language?

Yes / No / Partially. Please provide details.

We agree that allocating one of the overall strategic objectives specifically to encouraging greater use of the Welsh language is a statement of intent and ambition to increase the number of Welsh speakers and increase the use of the Welsh language. However, the foundation and growth objectives are very high level and very broad in developing a national strategy and policies, in partnership with Coleg Cymraeg Cenedlaethol and the National Centre for Learning Welsh. The detail underneath these broad objectives will be key and will need to involve collaboration with partners from across the education sector, pre and post 16. Medr will also need to work with the Welsh Government in considering how the Welsh Language and Education Bill aligns with its legislative duties

Without the operational detail of how Medr will achieve these strategic objectives it is too early to be able to evaluate whether there would any potential adverse effects on opportunities for persons to use the Welsh language or treating the Welsh language no less favourably than the English language.

17. What positive or adverse effects might the Plan have on:

a) opportunities for persons to use the Welsh language;

See Q16

b) treating the Welsh language no less favourably than the English language?

See Q16

- 18. Could the Plan be changed to increase positive effects, or decrease adverse effects on:
 - a) opportunities for persons to use the Welsh language?

Yes / No. Please provide details.

See Q16

b) treating the Welsh language no less favourably than the English language?

Yes / No. Please provide details.

See Q16