
Ymateb i Ymgynghoriad / Consultation Response

Enw / Name:	Owen Evans
Rôl / Role:	His Majesty's Chief Inspector of Education and Training in Wales
E-bost / Email:	ChiefInspector@estyn.gov.uk
Rhif Ffôn / Tel No:	029 2044 6446
Dyddiad / Date:	27.03.26
Pwnc / Subject:	Response re Future of tertiary education in Wales

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:

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

- 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.

This response is not confidential.

Response

Introduction

We broadly support the move towards a more coherent, collaborative and learner-centred tertiary system, but stress that reform must prioritise quality, progression and sustainability over participation targets alone.

A central concern is the weakness of current learner pathways, particularly at lower levels. Many learners enter further education disengaged, with poor attendance and additional needs, and too few progress successfully to level 3. We highlight the need for clearer, more ambitious progression routes with better alignment between schools, post-16 provision and labour market needs. We also suggest that consideration is given to opening vocational pathways for all 14–16 learners, which would need long-term strategic planning.

We emphasise growing system pressures, including rising learner numbers, financial fragility, workforce shortages and increasing learner needs. Schools and colleges are often expected to compensate for wider societal challenges without sufficient resources. We note that without strong system-level planning, competition between providers could undermine sustainability, equity and curriculum breadth.

We advocate for greater collaboration across the sector, supported by effective system leadership (particularly from Medr), to safeguard provision in rural areas, small sixth forms and Welsh-medium education. Welsh-medium vocational pathways are especially underdeveloped and require strategic investment and workforce planning.

In terms of policy, we caution against overly simplistic or volume-driven targets, arguing instead for a focus on learner outcomes, equity and long-term impact. However, we do support the need to increase our ambition in terms of the overall proportion of learners progressing to higher levels of qualifications through full-time or part-time learning or through apprenticeships. Better data is needed to support analysis and evaluation of impact. Lifelong learning, essential skills (literacy, numeracy, digital), Welsh medium and flexible provision should be priorities.

Key barriers for learners, such as cost, transport and access, must be addressed. We highlight both the opportunities and risks of AI, calling for clear national guidance and ethical frameworks.

Consultation questions

Participation

Q1: What further evidence is available regarding the backgrounds and pathways of young learners entering college on lower-level qualifications? Are these the right pathways for these learners?

Colleges, in particular, are facing challenges (financial, teaching and learning, support services) from the rising number of learners entering with lower-level qualifications. However, it is not only the level of qualifications that is challenging colleges and further education in general. Learners are increasingly arriving who were not engaged well in their learning in their final years of school. More learners than ever are educated other than at school (EOTAS) in Year 11, and alongside this there are higher proportions of learners than ever who are electively home educated (EHE). Learners progressing from EHE at age 16 are highly unlikely to return to school - almost all these learners go to college, take on an apprenticeship or seek employment. Attendance rates for Year 11 learners are the lowest for all year groups. Therefore, an increasing proportion of learners at age 16 have not been in daily routines of engaging with learning. These learners often arrive with considerable well-being needs too. Our recent report, [More than a last resort: Arrangements and quality of EOTAS tuition in Wales - Estyn](#), identified that it is extremely rare for local authorities to continue to support learners in EOTAS provision after the age of 16, even when this provision is having good impact in supporting re-engagement and building confidence.

For some learners, college provides engaging pathways after they leave school. While these pathways are appropriate for many learners, our evidence suggests progression routes are not always sufficiently clear or ambitious enough, and too many learners experience slow or stalled progression. Stronger alignment between school curricula, post-16 pathways and local labour market needs would improve outcomes. The lack of vocational pathways at age 14-16 contributes to the low level starting point for some learners at age 16. Whilst capacity for junior apprenticeships has increased, they are still not an option everywhere in Wales, they are also not an option that any learner can choose, and they are not true apprenticeships as they do not lead to competency-based qualifications.

Although a relatively high proportion of learners in Wales choose vocational pathways at age 16, a relatively low proportion of these learners achieve a level 3 qualification compared to other European countries, with more learners achieving at levels 1 and 2. There are various reasons for this. It is partly as a result of learners not having achieved competency based vocational qualifications at level 1 or 2, although this should not

necessarily always be a limiting factor. In some cases, the quality and level of challenge to learners in colleges is a factor in achievement rates. We are currently evaluating attendance and participation issues for learners in sixth forms and colleges, and are due to publish our report on this on 1 October 2026. It is already clear that attendance rates are weak in colleges, with learners missing the equivalent of almost a day a week on average, and this inevitably impacts on learner progress and achievement.

While *The Future of Tertiary Education in Wales* recognises that learners on lower-level courses are more likely to withdraw, it gives insufficient attention to the wider societal and demographic factors affecting learner engagement and progression. Rising poverty, increased numbers of learners with disrupted educational experiences (including EOTAS and home education), social, emotional and mental health needs, and reduced (part-time) school timetables for individual learners all have implications for the appropriateness of current tertiary curriculum offers. Without this context, there is a risk that colleges are implicitly expected to compensate for wider system pressures. A sustainable future for tertiary education requires clearer recognition of the shared responsibilities of Welsh Government, health services, local authorities, awarding bodies, Medr, Qualifications Wales and inspectorates.

Existing pathways for learners on entry level, level 1 or level 2 programmes, curriculum models and qualification specifications are not consistently fit for purpose. In response, colleges are, for example, increasingly using non-accredited independent living skills frameworks to support learner development. This practice can obscure the picture of additional learning needs (ALN) and highlights the need for greater clarity and consistency in how ALN is defined across the tertiary sector. Not all providers referenced in the document are subject to the same statutory duties under the ALNET (Wales) Act, and this distinction requires clearer articulation. Evidence from our link visits and thematic work indicates that colleges do not feel sufficiently resourced to meet their duties. Commonly reported challenges include limited workforce capacity and specialist expertise, inconsistent processes and practice across departments, limited collaboration with schools and local authorities, difficulties accessing specialist provision, and weaknesses in learner transition and post-16 planning. These responsibilities also have implications for staff workload and scale and quality of professional learning.

References to rising costs associated with growth in lower-level learner numbers and increased learner 'complexity' would benefit from wider contextual framing. Cost pressures often reflect systemic factors, including policy implementation demands, funding constraints and variable multi-agency working, rather than an inherent increase in learner need. Learner needs are frequently straightforward; however, the systems and support required to meet them are often complex. Care should also be taken not to equate complexity of need with severity of learning difficulty, recognising that learners across all levels of provision may face significant barriers to participation and success.

Q2: What more do we know about the proximate causes of the recent uplift in college enrolments? Do we expect it to continue?

There are various factors to consider. Evidence from core inspection findings and link inspector engagement with colleges, suggests the recent uplift is driven by a combination of demographic growth in the 16–18 cohort, pre-16 issues (detailed in our response to question 1, but specifically relevant here are learners progressing from EHE), post-COVID realignment of GCSE grade outcomes, labour market uncertainty along with increased demand for vocational and technical routes. Another ongoing factor is that the number of sixth forms in Wales has been gradually reducing over time, and this inevitably means that a higher proportion of learners progress to college.

The forecasted demographic trends in the 16-18 cohort would suggest that the increase in enrolments is likely to continue through to 2030. This cohort is forecasted to rise from 96,000 in 2024 to almost 110,000 by 2030, an increase of around 14% over the period.

Q3: What reasons might there be for higher levels of part-time and mature student higher education entry in Wales? Can/should Welsh Government seek to increase full-time higher education entry at 18 given higher rates of part-time and mature participation?

Improving outcomes for learners at level 2 at age 16 and level 3 at age 18 should be a high priority for Wales, as we do not perform favourably amongst comparable OECD countries in these measures. Improvements in performance in these measures would mean more learners are in a position where higher education would be an option at age 18.

The overall strategy for education and training post-16 should ultimately focus on supporting all learners into purposeful employment or, once they have been in employment, to progress within their career or change career. It is not a given that higher rates of entry to HE at 18 will lead to higher rates of employment in Wales. The focus should be on providing suitable pathways for all learners, ensuring that good advice and guidance is available about these pathways, and about providing effective support and intervention for learners aged under 18 who are, or at risk of being, not in employment, education or training (NEET). A strategy should also seek to address in a targeted way the inequities around Wales rather than just raise the overall proportion of learners entering HE at 18.

Q4: The UK Government announced their ambition for two-thirds of young people to participate in level 4+ education or training by the age of 25, an increase from the current 50% participation rate. A sub-target was also introduced for at least 10% of young people to pursue higher technical education or apprenticeships by age 25 by

2040. Should Wales set a similar target to UK Government for level 4+ and/or apprenticeship participation?

We consider that any targets for Wales should take account of Welsh demographics, labour market needs and the bilingual context. Aspirational targets could be helpful if accompanied by realistic funding, robust data, and a strong quality assurance framework. It is important that targets should avoid incentivising volume at the expense of learner outcomes. It is also important to ensure that funding routes support any targets set and consider any intended consequences, in particular, increasing vocational area qualifications that are not aligned well to labour markets trends. Our point in response to the previous question about improving performance at level 2 at age 16 and level 3 at age 18 also applies to this question.

Q5: What implications do the trends outlined in post-16 participation and elsewhere in this paper have for Welsh-medium and bilingual tertiary education?

Core inspection findings from Welsh-medium and bilingual provision indicate that there is wide variability in the availability and quality of Welsh-medium provision, particularly in FE and particularly for vocational pathways. Strategic planning, collaboration and investment will be essential to sustain viable Welsh-medium pathways and create new opportunities, supported by workforce planning and high quality delivery. Estyn thematic work on Welsh-medium education identifies ongoing challenges in recruiting specialist staff, ensuring continuity of provision across phases, and maintaining learner choice at higher levels. As more learners complete their pre-16 education through Welsh-medium and bilingual provision, it's important to ensure that there are suitable pathways post-16, particularly in vocational and technical routes where Welsh-medium options are currently more limited. A much higher proportion of learners in Welsh-medium secondary schools go to sixth form for post-16 education compared to learners in English-medium schools. It is unknown how many learners opt to remain at a Welsh-medium school and take A levels, enabling them to continue learning in Welsh, because taking a vocational route was not available in Welsh. Collaboration between colleges and Welsh-medium sixth forms is under-developed in most areas of Wales. Opportunities to share staff between schools and colleges to enable Welsh-medium provision to be delivered are also under-developed. National and local stakeholders should consider ways to encourage and incentivise closer working between schools and colleges to increase access to Welsh-medium vocational provision post-16.

Demographics and lifelong learning

Q1: How are tertiary education providers planning and preparing for forthcoming demographic change in their localities? What challenges will this create?

Core inspection findings and evidence from our annual report sector summaries indicate that providers are increasingly using local data to plan their curriculum offer, but their capacity to respond is uneven. Specific challenges include financial fragility and estate constraints, particularly in rural areas. In FE colleges and secondary schools, shortages of specialist teachers in mathematics, Welsh and science limit capacity and resilience.

Q2: What are the funding, legislative, and administrative barriers to increasing supply of, and demand for, flexible and accessible lifelong learning opportunities, both at lower levels (below level 3) and higher levels (above level 4)?

Core inspection findings, supported by provider feedback gathered during inspections and referenced in annual sector summaries, highlight key barriers including fragmented funding streams, complex eligibility rules, limited financial support for learners and high administrative burden for providers. At higher levels, loan-based funding can deter adult learners. Our thematic reviews of adult learning note that debt aversion, particularly among lower-income and older learners, remains a significant barrier to participation despite skills needs.

Q3: What changes need to be made to ensure appropriate opportunities for adults to improve their foundational skills in literacy, numeracy and digital literacy alongside vocational skills and other learning?

Core inspection findings from adult learning, apprenticeship and FE inspections, reinforced by thematic review evidence, highlight the need for high quality teaching and training models that embed literacy, numeracy and digital skills within vocational programmes, supported by specialist staff and suitable assessment frameworks and qualifications. We have noted that the design of, and assessment requirements for, skills qualifications are sometimes a barrier for learners – for example, see our report on [Delivery of Essential Skills Wales qualifications in apprenticeship programmes](#).

Q4: What lessons can be learned from the Personal Learning Account programme, and how can the successes of that policy be evaluated and expanded?

Personal Learning Accounts have been effective in engaging adults in priority sectors, particularly where employer engagement is strong. However, take-up is uneven and progression pathways are not always clear.

Stronger evaluation of learner outcomes and longer-term impact is needed before expansion. Estyn thematic reviews of employability and adult skills provision emphasise the need for clearer progression tracking, including transitions into sustained employment or further learning.

Q5: What further education and training for adults aged 19 and over should be prioritised for inclusion in regulations to be made under section 94 of the Tertiary Education and Research Act?

Priority should be given to literacy, numeracy and digital skills, employability-focused vocational provision, and in ensuring that there are progression routes to level 3 and above, particularly in those sectors identified as being critical to the Welsh economy.

Competition and collaboration

Q1: What are the current barriers to greater collaboration between tertiary education providers? What are the current enablers of effective collaborations?

Core inspection findings and system-level observations reported through annual report sector summaries identify several current barriers including funding competition, misaligned accountability systems, insufficient availability of Welsh-medium options, parental perceptions, prohibitive transport costs and other costs of the school/college day. Identified current enablers include strong collaborative arrangements, strong moral leadership, supported by high quality provision for teaching and learner wellbeing.

Estyn inspection evidence from school sixth forms indicates that oversight arrangements will need to pay particular attention to curriculum breadth, viability and learner progression in smaller sixth forms. Medr's role in promoting collaboration and coherent regional planning will be critical in mitigating risks associated with small cohorts, workforce fragility and narrowing subject choice, while ensuring that accountability arrangements do not unintentionally incentivise unsustainable provision. This aligns with the wider direction of post-16 reforms and the development of coherent 14-19 learning pathways, where inspection evidence consistently highlights the importance of shared planning across schools, colleges and work-based learning providers to improve learner choice and progression.

The aspiration for a more equal Wales is compromised by the exclusion of specialist FE colleges from being recognised as part of the tertiary education sector given the high number of learners in these colleges whose placements are funded through local authorities. Our recent thematic review of Independent Living Skills curriculum in colleges recommended that local authorities should work with FEIs, local employers and independent specialist colleges (ISCs) to ensure equitable access to the most suitable further education and training provision for all learners with ALN, in English and Welsh. The constrained funding environment and emphasis on collaboration and efficiencies lends itself to ISCs and FEIs working together at a local level to allow a wider breadth of learner need to be met.

Q2: Are there further examples of schools and colleges collaborating to maintain a broad and accessible curriculum in post-16 education and to improve transition between pre- and post-16? Are there further examples of universities collaborating to deliver degree provision? Can this be further developed to safeguard at-risk subject areas?

Core inspection findings and published Estyn inspection reports highlight positive examples of shared sixth-form provision and joint HE delivery, but these remain fragile. Core inspection findings from school sixth forms show that collaborative arrangements are most effective where schools pool timetabling, share specialist staff and jointly plan their curriculum offer. This enables learners to access a wider range of academic and vocational pathways than individual institutions could sustain alone. Our junior apprenticeship report showed the value of pre-16 collaboration for that particular group of learners, which resulted in improved transition into post-16 and curriculum continuity. Although, a little out of date now, many of the examples identified in [A review of the current 16-19 curriculum in Wales](#) are still valid. We have found a few very targeted examples of collaboration, for example between HE institutions and schools in relation to particular subject areas. For example and Cardiff University-led Modern Foreign Languages Mentoring scheme has helped to increase study of these subjects at GCSE and into post-16. In our [International Languages in Schools in Wales](#) report we identify effective collaborative provision across 4 secondary schools to secure and expand A-level provision through e-sgol, mitigating geographical challenges and poor subject take up.

Further development requires greater stability of funding arrangements and incentives that reward collaboration rather than competition. Successful models depend on clear governance arrangements, shared accountability for outcomes as well as trust between partners.

Q3: What are the benefits and disbenefits of the uncapped market for home undergraduates, both for students and for institutions? How does the higher education sector expect the market to develop over the coming decade, particularly when the number of 18-year-olds begins to decline?

No response

Q4: Where are there risks of 'higher education cold spots' in Wales? Are there particular subject areas at threat due to market competition and changing student preferences?

No response

Financial sustainability

Q1: What are the best examples of tertiary providers ensuring efficiency in the delivery of course provision while maintaining quality? And what are the challenges in doing this?

Core inspection findings and annual report sector summary evidence identify best practice including curriculum rationalisation, shared services, and digital delivery. Estyn inspection evidence from school sixth forms and FE colleges shows that rationalising low-enrolment subjects and developing joint delivery models can help maintain quality, but these approaches require strong leadership and clear communication with learners and parents. For example shared international languages A-level provision through a hybrid approach across secondary schools in Monmouthshire enabled more cost effective delivery. In FE colleges there are good examples of mixed-level programmes to support delivery and progression.

Challenges include maintaining staff morale, learner support and quality assurance. Estyn thematic reviews on workforce capacity highlight increasing pressures on staff workload, recruitment and retention difficulties along with the need for sustained professional learning.

Q2: Where are there opportunities for cost-savings in the delivery of tertiary education?

Opportunities for cost-saving in the delivery of tertiary education include collaborative provision, shared estates, joint procurement and regional planning of provision. However, realising such savings often requires upfront investment. However, it is important to recognise that collaboration can increase costs – for example, by increasing transport costs to access provision on different sites.

In some cases, local authorities have been too slow to address small sixth forms, which are expensive to run due to class sizes and teacher to learner ratios, and offer a very limited range of level 3 options for learners.

Q3: What further evidence is available regarding the cost barriers to accessing tertiary education for learners and students?

Core inspection findings, including learner voice gathered during inspections and reflected in annual report sector summaries, highlight transport, accommodation, digital access and living costs as major barriers, particularly for learners from low income households.

Q4: Where should Welsh Government prioritise direct (grant expenditure) and indirect (loan outlay) support for tertiary education? What evidence is available regarding the best social/economic and private/public returns on such investments?

It is important to maximise the proportion of learners achieving level 2 qualifications in literacy and numeracy, as research shows how important such qualifications are as gateways to employment or further learning. Welsh-medium education and training will need investment to increase vocational options, and to support the national target of a million Welsh speakers by 2050.

Q5: Where should Welsh Government prioritise future capital investments in tertiary education infrastructure and estates?

There are a range of considerations, including: modernising learning environments, digital infrastructure, and estates that support collaboration and financially sustainable pathways and reduce any wider transport or accessibility challenges.

Wales does not currently have a coherent strategy for vocational education and training, particularly at age 14-16. Should Wales develop a long-term vision to develop vocational pathways for all 14-16 year olds, then this will require considerable investment in existing local authority or college estates.

Communities and the economy

Q1: What elements of Longitudinal Education Outcomes (LEO) data should Welsh Government and Medr prioritise to better understand labour market outcomes from tertiary education?

Matching course completion by subjects and qualifications to employment status, including sustained employment, earnings progression and regional retention should be prioritised, disaggregated by learner characteristics and by provider and course type. Estyn inspection evidence from school sixth forms suggests that progression patterns differ markedly between academic and vocational routes, reinforcing the importance of nuanced analysis.

Q2: Aside from LEO, what other data and information should be better utilised to understand the labour market outcomes of tertiary education?

Employer feedback, learner destinations data, and regional skills intelligence should be used more systematically alongside LEO. Learner destination is currently of limited value.

This is because data is only captured 8 weeks into Year 12, and we know from course completion rates that a considerable proportion of learners drop out after this point. It is also limited because it is only useful for 16 year olds as the data for 17 and 18 year olds is only collected for learners leaving sixth forms.

Q3: How can Welsh Government support for research funding best leverage UK-wide funding and 'crowd in' private sector investment?

No response.

Q4: Collaboration and specialisation of institutions may create efficiencies and stronger agglomeration effects for teaching, employment and RD&I. What evidence can be used to underpin this, and does it suggest what and how specialisation should take place? This could also create risks and challenges, what are they?

Where sixth forms have closed in recent years, we have not seen significant post-16 issues arising for learners in these schools. Where colleges have merged in the last two decades, we have not seen significant issues for learners. Specialisation often means that only one particular campus within a college offers certain courses, inevitably making these harder to access for learners who do not live near that campus. However, it does enable the provision to be financially viable and potentially provide a high quality learning experience.

Q5: What opportunities and threats does AI pose to the future of tertiary education? What implications are emerging from its uses for providers and for Welsh Government policy?

We recently published a report on AI in FE colleges: [Exploring the Potential: Artificial Intelligence in Further Education](#).

Inspection evidence, including findings from recent thematic work on artificial intelligence in further education, indicates that AI presents significant opportunities to enhance teaching, learning, learner well-being and organisational efficiency across the tertiary system. However, this evidence also highlights emerging risks that require clear national expectations, coherent system oversight, supported by sustained professional learning.

In terms of opportunities, AI is increasingly used by learners as an everyday study support tool, including to summarise information, structure written work, generate revision materials and support independent learning. These benefits are particularly evident for learners with additional learning needs, including neurodivergent learners and those with literacy or language needs, where AI can support confidence, accessibility, and personalised learning.

Inspection findings also highlight growing use of AI by staff to support lesson planning, differentiation, resource development and formative feedback. In stronger examples, AI contributes to more timely and clearer feedback while professional judgement remains central. At an organisational level, colleges are beginning to use AI to support admissions, learner services, accessibility checking and internal processes, reducing administrative burden and enabling staff to focus more on direct learner support. There are also early examples of AI supporting bilingual provision and inclusion.

In terms of associated risks and challenges, a consistent finding is uneven and inconsistent implementation across providers and curriculum areas. Learners frequently report a lack of clarity about acceptable AI use, particularly in assessed work, leading to anxiety, along with mixed messages from staff and reduced trust. Inconsistent guidance from awarding bodies compounds this uncertainty. Evidence also points to emerging risks to assessment validity, indicating that continued reliance on traditional written assessment may become increasingly unsustainable without longer-term redesign.

Ethical, safety and safeguarding issues relating to AI remain underdeveloped in the overall learner experience. While providers recognise risks relating to data protection, bias, over-reliance and academic integrity, evidence shows limited systematic development of learners' critical AI literacy. There are also emerging concerns about affordability, sustainability and equity of access, as learners often rely on free or limited tools that differ from those used by staff or other learners.

In terms of potential impacts on Welsh Government policy, evidence suggests a strong case for clear national expectations on acceptable AI use, assessment integrity and learner protection, alongside sufficient flexibility to support innovation. Coordinated sector guidance, professional learning and collaboration will be important to avoid fragmentation, manage cost pressures and promote equity of access. AI policy should emphasise clarity, transparency and ethical use, positioning AI as a tool to enhance learning, inclusion and professional practice rather than replace human judgement or the cognitive process of learning.