

Medr strategic plan consultation

The new regulator for Higher Education and research in Wales, Medr, opened [a consultation](#) on its draft strategic plan 2025-2030:

The draft Strategic Plan sets out our proposed response to the Welsh Government’s statement of strategic priorities for tertiary education and research and innovation, issued on 28 February 2024. It also takes account of the legislative requirements placed on us in the Tertiary Education and Research (Wales) Act 2022, as well as other legislation that places duties on public bodies in Wales. The Plan is also set in the context of us balancing the establishment of a new organisation and implementation of new legislative requirements in the short term, with setting our ambition and aspirations for the longer term. Once approved by the Welsh Ministers, the Plan will be published in the new year along with our response to this consultation.

Medr set the deadline for responses at **Friday 25 October 2024**, via an [online webform](#) (plain text responses only).

Question	Options / Notes	Response (if required)
Section 1: legislative duties & evidence		
<p><u>QUESTION ONE</u></p> <p>The Tertiary Education and Research (Wales) Act 2022 places eleven strategic duties on Medr to:</p> <ol style="list-style-type: none"> 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 (<i>sic</i>) 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 <p>To what extent do you agree that the Plan enables us to fulfil our duties?</p> <p>Are there any duties that are under-represented in the Plan? Please provide details.</p>	<p>Strongly agree / Agree / Disagree / Strongly disagree.</p> <p>Yes / No</p>	<p>The draft Plan largely fulfils the aspirations of the strategic duties, but with three important exceptions:</p> <ol style="list-style-type: none"> 1) On Duty 5, we are concerned that the Plan offers a confused interpretation of whether research carried out by providers should be focussed on REF impact or on activity which benefits Wales’ economy and society more broadly. We expand on this in our response to Q9, whilst our response Q8 sets out a related concern about the inconsistent language used in the document when talking about contribution of Wales’ tertiary sector. 2) On Duty 6, the Plan fails to articulate as fully as it should how Medr will promote collaboration with Learned Societies (and indeed other regulators, eg HEIW), which is an essential component of the strategic duty to promote collaboration and coherence in tertiary education and research. We expand on this in our response to Q13. 3) On Duty 9, it appears that Medr’s interpretation of Civic Mission relates solely to the involvement of learners, with no reference to the important civic mission role of research and researchers. This is particularly relevant for the social sciences, where research and researchers in Welsh universities is a critical delivery agents of tertiary providers’ civic mission activities, not only bringing expertise to bear on civic / community projects, but often making such projects an integral

		<p>part of their research and practice. We expand on this in our response to Q9, Q14 and Q15.</p> <p>4) On Duty 10, it is surprising that there is no mention in the draft Plan of international students, which should be a significant element of Wales' global outlook on tertiary education and research.</p>
<p><u>QUESTION TWO</u></p> <p>Our Plan needs to respond to the statement of strategic priorities for tertiary education and research and innovation issued to us by the Welsh Government. The five priorities are:</p> <ol style="list-style-type: none"> 1) 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. <p>Does the Plan sufficiently address all of these priorities?</p>	<p>Yes / No / Partially</p> <p>If No or Partially, please provide details of how could it better respond to them</p>	<p>As set out in the answer to Q1, we support elements of the draft Plan, which we believe broadly fulfils both the strategic duties of the Tertiary Education & Research (Wales) Act 2022 and the strategic priorities issued by the Welsh Government. Nevertheless, we do have misgivings about some shortcomings within the Plan, specifically in relation to strategic duties 5, 6, 9 and 10 (as set out in our response to Q1).</p>
<p><u>QUESTION THREE</u></p> <p>Does the Plan take account of the need to:</p> <ol style="list-style-type: none"> a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; b) advance equality of opportunity between persons who share a protected characteristic and persons who do not share it; c) foster good relations between persons who share a protected characteristic and persons who do not share it: 	<p>Yes / No / Partially. Please provide details.</p> <p>Yes / No / Partially. Please provide details.</p> <p>Yes / No / Partially. Please provide details.</p> <p>Yes / No / Partially. Please provide details.</p>	<p>[no commentary required]</p>

d) reduce the inequalities of outcome which result from socio-economic disadvantage?		
<u>QUESTION FOUR</u> Will the Plan contribute to the achievement of the national wellbeing goals set out in the Wellbeing of Future Generations Act 2015?	Yes / No / Partially. Please provide details.	[no commentary required]
<u>QUESTION FIVE</u> Are the aims and commitments in the Plan in accordance with the sustainable development principle?	Yes / No / Partially. Please provide details.	[no commentary required]
<u>QUESTION SIX</u> <p>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’.</p> Is there any additional evidence we need to reflect in the Plan?	Yes / No. Please provide details.	[no commentary required]
<u>QUESTION SEVEN</u> Do you foresee any unintended consequences or negative impacts resulting from the Plan?	Yes / No. Please provide details.	As set across other responses, we would be concerned that as things stand, enactment of the Plan would result in: <ul style="list-style-type: none"> • Little / no collaboration with Learned Societies. • A limited interpretation of Civic Mission which related solely to the involvement of learners, with no reference to the important civic mission role of research and researchers. • Little / no exploration of the important role of international students in the global outlook of Wales’ tertiary education system. • A confused interpretation of whether research carried out by providers should be focussed on REF impact or on activity which benefits Wales’ economy and society more broadly.
Part 2: aims, priorities and opportunities		
<u>QUESTION EIGHT</u>	Yes / No / Partially.	Whilst in some ways a minor linguistic point, we would like to flag here that there is an inconsistency within the Plan over the areas where Medr

<p>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.</p> <p>Do the strategic aims in the Plan enable us to deliver on our vision?</p>	<p>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.</p>	<p>and Welsh Government wish to see evidence of tertiary education system’s contribution.</p> <p>The strategic priorities specifically mention contribution to the “economy and society” of Wales, and this phraseology is used for much of the Plan. However, there are also instances where other factors are added in the Plan:</p> <ul style="list-style-type: none"> - The “long-term ambitions” section (p4) talks of “the economic, community, cultural and environmental needs of Wales” - Page 12 talks of “the future economic, social, environmental and cultural needs of Wales”, and then in the same paragraph “improving the economic, social, environmental and cultural wellbeing of Wales”. - Page 24 makes a pledge about “the economic, social and cultural life of Wales” <p>Whilst these examples are outliers as the bulk of the document does reference “economy and society” consistently, it would be helpful to clarify exactly where the focus lies for the tertiary education system demonstrating its contribution. If – as seems to be the case – the scope of the strategic priorities is solely on the economy and society on Wales, then it would be clearer for all if the references to environment, culture and community were either excised, or that there was a clear statement that the term ‘society’ was being interpreted broadly to include environment, culture and community.</p>
<p><u>QUESTION NINE</u></p> <p>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.</p> <p>Considering each of the strategic aims, are the founding and growth commitments correct?</p>	<p>Yes / No / Partially. Please provide details.</p>	<p>We largely support the strategic aims, but with two significant exceptions.</p> <p>On Strategic Aim 2, we believe there needs to be something in the founding commitment which reflects the role of institutions’ research and innovation activities, as well as their learning and teaching. Currently the commentary says (p20): <i>“We will analyse the differing applications of civic mission and engagement within the tertiary education sector, focusing initially on higher and further education. We will create conditions that encourage learners to be valued members of their local communities and engaged citizens, that encourage providers to share their learning and work with providers to determine how best the impact can be measured.”</i> Whilst this is welcome, it is a major omission to have no mention at all of the role of research and researchers in universities as critical delivery agents of tertiary providers’ civic mission activities. This is clearly emphasised by Universities Wales’ Civic Mission Framework setting out how HEIs across Wales are interpreting and delivering on their civic mission responsibilities – often with social science researchers at the forefront. Reducing civic mission simply to learner involvement in</p>

		<p>community activities is a shortcoming that must be addressed before the Plan is finalised.</p> <p>On Strategic Aim 4, there is a tension between Medr’s vision and the detail beneath it, and specifically over whether Medr wants to promote research that benefits the Welsh economy and society, or research which has measurable impact. Both the aim and the founding commitment imply that research impact will be gauged through the REF exercise – but if Medr is to achieve its aspiration to foster “<i>research and innovation activity that benefits Wales</i>” then a broader interpretation of impact may be required. Part of this might be addressed through subsequent workplans which help to identify new ways to promote research over and above existing mechanisms.</p>
<p><u>QUESTION TEN</u></p> <p>What are the key priorities for current and future <u>learners</u> in the tertiary education and research sector in Wales?</p> <p>Are these sufficiently reflected in the Plan?</p>	<p>Yes / No / Partially. Please provide details.</p> <p>In your response, please consider whether the Plan sufficiently balances these priorities alongside the other duties (as outlined in part one) placed on us.</p>	<p>[no response]</p>
<p><u>QUESTION ELEVEN</u></p> <p>What are the key priorities for tertiary education <u>providers</u> in Wales in the next five years?</p> <p>Are these sufficiently reflected in the Plan?</p>	<p>Yes / No / Partially. Please provide details.</p> <p>In your response, please consider whether the Plan sufficiently balances these priorities alongside the other duties (as outlined in part one) placed on us.</p>	<p>[no response]</p>
<p><u>QUESTION TWELVE</u></p> <p>What are the biggest opportunities of having a single body responsible for oversight of the whole tertiary sector?</p>	<p>In your response, please consider whether the Plan enables us to make the most of these opportunities, or how we could do this better.</p>	<p>[no response]</p>
<p><u>QUESTION THIRTEEN</u></p> <p>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?</p>	<p>Fully / Moderately / Slightly / Not at all.</p> <p>Please provide details.</p>	<p>The plan fails to articulate as fully as it should how Medr will promote collaboration with Learned Societies (and indeed other regulators such as HEIW), which is an essential component of strategic duty 6 of the Tertiary Education & Research (Wales) Act 2022.</p> <p>Learned Societies have a uniquely important role to play in supporting individual professionals and the broader academic or scientific</p>

		<p>communities. Their omission from the draft Plan's aspirations on collaboration should be addressed. Furthermore, Medr should set out in greater detail – either in its amended Plan or in subsequent workplans – how it will use its convening power to help address shortfalls of evidence within the Welsh policymaking and decision-making ecosystems.</p>
<p><u>QUESTION FOURTEEN</u></p> <p>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.</p> <p>Considering the context we are working in, to what extent is the level of ambition in the Plan suitable?</p>	<p>Fully / Moderately / Slightly / Not at all.</p> <p>Please provide details.</p>	<p>Whilst there is an awful lot that we welcome in the document, the level of ambition as articulated in the Key Milestones section (p27) is underwhelming in relation to two of Medr's strategic aims, namely Research & Innovation and Civic Mission. None of the seven anticipated milestones touch upon either strategic aim. On Civic Mission, it may be that constructive ambiguity is helpful so that a framework and milestones can be coproduced with providers – but to have no anticipated milestone on Research & Innovation feels like a major gap. It would be helpful if Medr set out what they believe 'good' would look like on Research & Innovation by 2030, and articulated how it sees the tertiary sector in Wales contributing towards this goal.</p>
<p>Part 3: our ambitions</p>		
<p><u>QUESTION FIFTEEN</u></p> <p>Please consider the ambitions on page 4 of the Plan.</p> <p>a) To what extent do you agree with our long-term ambitions for success? b) What changes are required in the sector to achieve these long-term ambitions? Please provide details and examples. c) How will we be able to measure success against these ambitions? Please provide details.</p>	<p>Fully / Moderately / Slightly / Not at all.</p> <p>Please provide details.</p>	<p>There is – again – a lot to welcome in the ambitions as set out on p4, and they do contribute to the vision outlined on the same page. Nevertheless, we would make three important and distinct points about the ambitions:</p> <ul style="list-style-type: none"> - The ambition on research (“Growth in the excellence and impact of research and innovation in Wales”) indicates that this will be benchmarked against REF. This is understandable, as it's the easiest way of measuring research impact. However, success via the REF is not necessarily the same as success against the Welsh Government's strategic priority for Medr to <i>“ensure that the tertiary education system contributes to the economy and society”</i>. It may be that in developing metrics to support Medr's Plan, some thought is given to balancing the sometimes competing needs for research excellent / impact as measured by REF, and fulfilling this broader social responsibility of research institutions. - We would reiterate the point made earlier about the need for consistency of language. Most of the document refers to the need for Medr and tertiary education providers to deliver for the <i>“economy and society”</i> of Wales. Yet the ambitions set out on p4 include a focus on <i>“Greater alignment of knowledge, skills and understanding with the economic, community, cultural and environmental needs of Wales”</i>. Are <i>“community,</i>

		<p>cultural and environmental” here being used as a proxy for “social”? If not, why has “social” been ignored?</p> <ul style="list-style-type: none"> - A final, broader point is about the place for Civic Mission within Medr’s vision. There is no specific mention of Civic Mission in the vision or ambitions on p4 – but on p6 under Strategic Aim 2 there is an expectation that providers “<i>Promote civic mission, encouraging learners and providers to be engaged members of their communities</i>”. This could be read as an indication that Medr’s interpretation of civic mission is solely that it’s about learners within tertiary education institutions, and not at all about the research and staff expertise of those institutions being deployed for civic and social good. At the very least, there is a clear need for the document to more fully reflect that many institutions’ greatest civic mission contribution lies in how they deploy the expertise and resources of their researchers to improve the communities around them, alongside the involvement of their students. This feels completely absent from the document at the moment.
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Part 4: Welsh language

<p><u>QUESTION SIXTEEN</u></p> <p>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?</p>	<p>Yes / No / Partially. Please provide details.</p>	<p>[no commentary required]</p>
<p><u>QUESTION SEVENTEEN</u></p> <p>What positive or adverse effects might the Plan have on:</p> <ul style="list-style-type: none"> a) opportunities for persons to use the Welsh language; b) treating the Welsh language no less favourably than the English language? 		<p>[no response]</p>
<p><u>QUESTION EIGHTEEN</u></p> <p>Could the Plan be changed to increase positive effects, or decrease adverse effects on:</p> <ul style="list-style-type: none"> a) opportunities for persons to use the Welsh language? b) treating the Welsh language no less favourably than the English language? 	<p>Yes / No. Yes / No. Please provide details.</p>	<p>[no commentary required]</p>