



Y GORAU OLL

*MAKING WALES THE BEST PLACE IN
THE UK TO BE A STUDENT*

Gwenno Roberts and Jim Dickinson
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THE POST 18 PROJECT

ABOUT THE AUTHORS

Gwenno Roberts

Gwenno Roberts is Llywydd UMCA for 2026–27, representing Welsh-speaking students and Welsh culture at Aberystwyth University. She works to strengthen Welsh-medium student life, promote opportunities to learn and use the language, and ensure that Welsh-speaking students are heard in university decision-making. As UMCA's president, Gwenno also leads campaigns and activities that celebrate Wales's language, culture and community.

Jim Dickinson

Jim Dickinson is Associate Editor at Wonkhe, where he writes about students, students' unions, regulation and the politics of higher education. He has held senior roles in the students' union movement and is known for detailed analysis of policy, governance and the student experience. His work focuses on how decisions made by governments, regulators and universities affect students in practice.

ABOUT THE POST-18 PROJECT

The Post-18 Project provides fresh thinking around higher learning for adult lives, seeking to shape the policy environment around universities and colleges and provide practical solutions for anyone with a stake in the success of post-18 education in the UK.

We seek to help shape the policy environment with practical ideas, helpful research, big thoughts and new ways to think about how post-18 education can be funded, the system configured, and how institutions relate to the outside world as well as their own staff and students.

The system needs reform. Our aim is to provide the foundations for change, and capacity within the sector itself to have the conversation about the how, what, when and why of it.

The Post-18 Project is part of **Thesis** – a house of higher education ideas, alongside

- **Wonkhe** - the home of the UK higher education debate
- **Policy.Partners** - senior strategic counsel and advisory for universities, sector bodies, and the organisations that work with them
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TABLE OF CONTENTS

Foreword	6
The proposition	8
The test for the review	9
Eight asks	9
Why Wales can do this	11
Ambition is the answer to demographic decline.....	11
The small country advantage.....	12
Doing better, getting better – the case for changing the rules.....	13
A new deal for Welsh students.....	13
The eight ambitions	15
Ambition 1: Every student will shape their own learning	16
Fixing the credit system.....	16
Learning from European innovation	18
Breadth as well as depth	18
A Welsh approach to teaching and learning	18
Dual and combined degrees across institutions.....	19
International mobility – first and fastest on Erasmus+.....	19
A classification system that sees the whole graduate	20
What this means in practice	20
Ambition 2: Every student will contribute to Welsh communities.....	21
A civic guarantee	21
Subject-level associations	22
Peer contribution as learning.....	22
Placements that build retention – and a pipeline that keeps its promises.....	22
What this means in practice	23
Ambition 3: Every student will have what they need to thrive	24
Defend the architecture first	24
Restore the promise – and know the number	24
Cross-government cost reduction.....	25
Housing costs that relate to reality.....	25
What this means in practice	25
Ambition 4: Every student will be supported to succeed.....	27

Knowing your rights	27
Student tutoring at scale.....	27
Co-convened student services.....	28
Credit-bearing transition	28
Space to learn from mistakes	28
What this means in practice	29
Ambition 5: Every student will be healthy, safe – and help Wales be healthier	30
A national student health strategy	30
Safe as well as well	30
Biennial national research on student mental health and wellbeing	31
Students contributing to Welsh health	31
Disability rights as student rights	31
Housing as infrastructure	31
What this means in practice	32
Ambition 6: Every student will be able to learn languages	33
The right to language credit	33
Welsh-medium provision across subjects.....	33
Keeping the language you arrived with	34
What this means in practice	34
Ambition 7: Every student will be a partner in their education.....	35
From “should” to “must”	36
Module evaluation as universal engagement	36
Consent, not just consultation	36
Funded independence	37
Complaints as learning – and protection that exists before you need it	37
What this means in practice	37
Ambition 8: Every student will have good work	39
A national student employment strategy	39
Universities and students’ unions as exemplar employers.....	40
Careers in the course, not in the corner	40
Recognising the work students already do	41
Work that keeps graduates in Wales	41
What this means in practice	42
Study in Wales: telling the story	43

Delivering the ambitions.....	44
What the Welsh Government can do without waiting	44
What Medr should do	44
What institutions should do.....	45
Cross-government consequences.....	45
Conclusion: Y Gorau Oll.....	47
Summary: Eight ambitions for Welsh higher education.....	48
Bibliography	51

FOREWORD

The Post-18 Project exists to create fresh thinking around higher learning for adult lives. Such higher learning is governed in the United Kingdom separately by four distinct nations' administrations – an example of successful and enduring devolution, of which we will hear more now that a Burnham administration governs in Westminster. But until such devolution is applied in England, the split between the four nations – in population, resources, number of institutions, and much else – is profoundly unequal. As such, England commands the lion's share of policy attention, despite being quite distinct from its Celtic neighbours.

It is therefore a pleasure for The Post-18 Project to present this report, that engages so deeply and fruitfully with the Welsh system for higher learning, both as it is now, and as it might be in the future, as that nation stands on the cusp of a new review of its current provision. The report has been researched and written to support the recently announced review of higher education in Wales, and is unashamedly focussed on the needs and ambitions of that nation.

But, of course, it has lessons for other governments too, especially the English system which looms so large in the planning assumptions of Welsh higher education administrators. This should not be a surprise: that the modern boundary between the two countries still mostly follows a defensive earthwork named for an 8th Century Anglo-Saxon king is a reminder of the divisions between England and Wales, but also a reminder of the sheer length of time these nations' fates have been intertwined.

In a very real sense, England and Wales are creations of each other. When Germanic invaders conquered the post-Roman kingdoms of these islands in the depths of the Dark Ages, they warred with each other as much as those who already dwelt here, but the Anglo-Saxons always knew something was distinct between them and the Romanised Celts, the *Walhaz*, they sought to conquer. The English, whatever the differences between them, were defined by the fact that they were not Welsh.

But equally, though Welsh communities have claim to the greatest level of continuity from pre-Roman times to the present of any in these islands, they rarely had a single ruler. Only when Edward I of England overthrew their native dynasties, constructed vast castles to ensure control, and imposed his son as "Prince of Wales" (as heirs to the throne continue to be to this day) did Wales become an enduringly united polity

In 21st Century Britain, it is unlikely the *fyrð* of Mercia will ever need to rush to Offa's Dyke to defend against an attack from Powys, but decisions made in and about England continue to reach beyond the border to affect the policy landscape of Wales.

But as this report makes clear, there is also much Wales can do that England either cannot or will not.

A smaller nation can more easily interlink its work to focus on the totality of the experience of both young adults (the majority of higher education students) and older learners (who have distinct needs because of their coming into HE at a later stage).

Educational issues can be properly set at the centre of a web of social policy, including accommodation, healthcare, employment.

Recent analysis by The Post-18 Project of the English HE system highlighted its lack of coherence, criticising a failure by government and the sector to properly attend to all the different control factors that international evidence makes clear are the arbitrators of the success or otherwise of an educational system.

Wales has already led the four nations in responding to that challenge. A single tertiary regulator, Medr, is already established with a wider mission and stronger powers than its siblings in other nations. If the Welsh government now takes up the recommendations of this report, the Welsh system of higher learning will be ahead again – building the coherence required to deliver on the ambition this paper lays out: for Wales to be the best place in the United Kingdom to be a post-18 student.

Professor John Blake
Director, The Post-18 Project

THE PROPOSITION

Welsh students are ambitious.

They want qualifications that open doors. They want to develop capabilities that matter. They want to contribute to their communities, travel, learn languages, build networks, and shape their own futures. They want their education to mean something – not just a credential but a foundation for the life they want to lead.

Students are learners — but they are more than learners. They are workers, citizens, tenants, partners and contributors whose lives cannot be divided neatly between education and everything that makes education possible.

The question is whether higher education system matches their ambition and views them as more than learners.

This paper argues that Wales has an opportunity to become the best place in the UK to be a student – not by lowering expectations but by raising them. By creating a higher education system that enables ambitious students to realise wider ambitions for Wales: a more skilled workforce, stronger communities, more graduates who come, stay or return, and a distinctive international reputation.

Wales has foundations to build on. The Diamond reforms delivered the UK's most progressive student finance system. Medr's establishment in 2024 created a unified tertiary regulator with strategic duties far broader than England's market-focused Office for Students. Welsh universities outperformed UK averages on every theme in the 2025 National Student Survey, and overall satisfaction rose again to 83.5 per cent in the 2026 results. And Wales already knows that “full-time” students rarely fit the traditional mould – 37 per cent study part-time, 43 per cent are over 25, and lifetime participation reaches 55 per cent by age 30.

But foundations are not the same as ambition. The Welsh Government's tertiary education evidence paper identifies challenges – participation gaps, demographic decline, financial pressures – and does so with unusual candour. What it does not yet articulate is a positive vision for what Welsh higher education could become if it trusted students to be ambitious and gave them the tools to succeed.

This paper proposes eight ambitions that could transform the Welsh student experience, and eight asks that would deliver them. Together, they offer a framework for the next Senedd term – not a defensive response to crisis, but a confident vision of a system that is for Wales, not just in Wales.

THE TEST FOR THE REVIEW

The question is about to be asked formally. The new Welsh Government has committed to an independent, cross-party review of higher education and how it is funded – commissioned within its first hundred days, with, in the minister’s words, nothing off the table. Reviews like this set the weather for a decade. Diamond did in 2016, and everything in this paper is built on ground Diamond laid.

So the stakes are simple: if the review is to succeed, it cannot just be an accountancy exercise that decides who bears which losses. It has to describe the system Wales actually wants – and students have to be at the centre of the description, not a line in the costings. If the review reports and students cannot see themselves in it – if it is all institutional sustainability and no student ambition – it will have failed, whatever the spreadsheets say.

That is the test this paper sets. What follows is the settlement it proposes.

Eight asks

Everything in this paper serves eight headline asks, built following the authors’ attendance at an all-Wales event featuring student leaders (and the staff that support them) from across Wales’ universities. They are what the review itself should recommend.

1. Protect Diamond’s universal maintenance architecture – every Welsh student gets the same total, with only the grant/loan mix means-tested. If resources need concentrating, concentrate the grant within the total. Never means-test the total itself.
2. Restore the maintenance benchmark and unfreeze the thresholds – commission a Welsh minimum income standard for students as the evidence base, then re-link support to the wage-based promise Diamond made, with automatic uprating.
3. Redefine “full-time” as 90 credits, with a maintenance floor below it – so a student who drops a module, falls ill, or takes on a representative role does not see their income collapse, and reassessment periods carry base-rate support.
4. Build credit portability across the tertiary system – a common credit framework, dual and combined degrees across the university-college boundary, credit-based tuition liability, and cross-disciplinary credit by right.
5. Strengthen the Learner Engagement Code with a students’ union funding floor – from “should” to “must”, with a formal students’ union role in annual assurance and a minimum share of income protected during financial difficulty.
6. Commission the missing evidence – a biennial minimum income standard, biennial national research on student mental health and wellbeing, and an all-Wales prevalence survey on harassment and sexual violence.

7. Prepare Wales to be first and fastest into Erasmus+ – ready at full scale when the 2027 call opens, with Taith’s future settled as complementary infrastructure rather than a casualty.
8. Adopt a national student employment strategy – good work standards for every campus job, timetabling and assessment that accommodate working students, and credit and Diploma Supplement recognition for the work students already do.

A word of candour about money. Some of these reforms are rule changes ministers can make without primary legislation or new spend – the credit definitions, the fee liability rules, the Code. Some are reallocations within existing budgets. And some – restoring the wage link, unfreezing thresholds, deploying grant where the Treasury’s loan ceiling binds, Welsh-medium capacity, the students’ union funding floor – require new grant spend. This paper is explicit about which is which, because a case that pretends everything is free will not survive contact with a fiscally squeezed review.

And a word about scope. Much else in this paper – a national student health strategy, a national student employment strategy, rent measures that include students, a graduate guarantee behind bursary-tied public service courses, protected Welsh-medium staff capacity, graduate repayment holidays – sits beyond what a review panel can deliver by itself. Those are cross-government consequences of taking the review seriously: the things a government that accepts the proposition should do, using the joined-up machinery only a small country has. They are labelled as such throughout.

WHY WALES CAN DO THIS

Ambition is the answer to demographic decline

The default narrative about Welsh tertiary education is defensive. An ageing population. The number of 16-year-olds in Wales set to fall by 17 per cent between 2027 and 2037, with UK-wide demand for places projected to drop by close to a fifth in the 2030s. Financial pressures on institutions – six of Wales’ eight universities have been running deficits, and Medr’s own assessment warns of a sector at risk of “shrinking out of deficit” rather than growing out of it. The implication is that Wales must manage decline, compete harder for a smaller pool, and hope for the best.

This paper argues the opposite. Demographic decline makes ambition more necessary, not less. If Wales cannot grow its way out of the problem through more 18-year-olds, it must attract students from elsewhere, develop them more fully, and keep them after they graduate. That requires a student experience so good that people choose Wales – and stay.

Wales faces two linked challenges that reform could address.

The first is attracting students. Only 32.5 per cent of Welsh 18-year-olds applied to higher education in 2025 compared to 41.2 per cent UK-wide – and the gap is growing. Just 39 per cent of pupils eligible for free school meals progress to Level 3 qualifications, against 72 per cent of their peers. Welsh boys have the lowest higher education participation of any group across all UK nations. Meanwhile, only 39 per cent of full-time undergraduates at Welsh universities are Welsh-domiciled – the majority are attracted to Welsh institutions from elsewhere, but not necessarily to Wales itself.

The second is retaining graduates. In 2022/23, 27 per cent of Welsh graduates were working outside Wales fifteen months after completing their studies. And unusually, the Welsh Government’s own analysis suggests graduate supply has not outpaced demand in Wales as it has elsewhere in the UK – the graduate wage premium has held up. Which means the country needs more graduates, not fewer, if it is to address productivity challenges and fill skills gaps. There is no version of national renewal that does not run through them.

And retention alone is not enough. The latest Harvard Kennedy School analysis of UK regional growth finds that Wales was among the regions in Europe most exposed to deindustrialisation, and that the binding constraint on growth outside London is not a lack of skills in general but a lack of high-productivity firms in the right sectors – while the public money that backs innovation flows overwhelmingly to London, Scotland and the Oxford–Cambridge–Bristol arc, amplifying regional inequality rather than correcting it, with early-stage equity for small firms scarcest exactly where it is needed most. Wales cannot wait for those firms to relocate. Its graduates will have to build them – which means a system that keeps graduates and helps them start businesses is not a nice-to-have but the mechanism through which regional growth actually happens.

A transformed student experience could address both problems. If Wales became known as the place where students are genuinely supported – financially, academically, in their health and housing – it would attract more applicants. And if that experience connected students to Welsh communities, employers and civic life throughout their studies, more of Wales’ young talent would stay or return – and more people would come to Wales to study, work and build a life.

The small country advantage

Wales has something England lacks: the ability to join up government.

In England, the student experience falls between departments. The Department for Education handles education policy but has no power over health, housing or transport. The Department for Work and Pensions sets welfare rules that treat students punitively. NHS England operates separately from universities. Local authorities make planning decisions without considering student populations. The result is fragmentation – nobody owns the problem, so nobody solves it.

Wales is different. With 3.1 million people and a single devolved government, coordination is possible in ways that Westminster cannot achieve.

Health: NHS Wales is directly accountable to Welsh ministers. A national student health strategy – coordinating universities, health boards and local authorities – could be mandated rather than hoped for.

Housing: The Renting Homes (Wales) Act already provides a distinctive framework, and the new government is committed to going further on rent regulation. Welsh Government can require housing impact assessments, set quality standards, and design rent measures with students in mind.

Transport: The young persons’ £1 bus fare shows what integrated thinking looks like. Making it permanent and universal for students is within devolved competence.

Welfare interaction: Welsh Government can design student finance to minimise punitive interactions and fund hardship support that plugs gaps.

Planning: Local authorities can be required to include student populations in development plans – recognising students as residents rather than temporary inconveniences.

The Welsh Government’s evidence paper notes that “government and providers need to work together.” True enough. But the bigger opportunity is for government to work with itself – education, health, housing, transport and communities departments coordinating around the student experience as a shared priority. A Cabinet sub-committee on student experience. Cross-departmental KPIs on graduate retention. Joint funding for initiatives that span portfolio boundaries. None of this is radical. It is basic good governance that Wales’s scale makes possible – and it is the kind of cross-cutting recommendation only an independent review can force onto the table, because no single department will volunteer for it.

Small countries can move faster than large ones. Wales should use that advantage.

Doing better, getting better – the case for changing the rules

The case for a different Welsh model is not sentimental. It is clinical.

The UK runs what looks, on paper, like a miracle: the youngest graduates in Europe, low dropout rates, a three-year completion norm. But the DfE-commissioned National Review of Higher Education Student Suicide Deaths found that well over a third of serious incidents made explicit reference to academic problems or pressures – exams, deadlines, anxiety about falling behind. On the WHO-5 index, UK students sit at the upper end of low wellbeing in Europe. Only 20 per cent report “very good” health compared to 48 per cent of the general population. Eurostudent’s 2024 analysis found that longer study hours were directly associated with lower wellbeing, and that paid work beyond 20 hours a week became actively harmful – while two-thirds of UK full-time students now work in term time, with working students averaging 50 hours a week of work and study combined, well above the 36.6 hours the ONS records for the general working population.

Perhaps the compression at least produces better-educated graduates? The 2023 PIAAC results suggest otherwise. UK graduates perform comparatively poorly on literacy, numeracy and adaptive problem-solving – adults in Finland with only upper secondary education outscore tertiary-educated adults in most participating countries, including England. We are producing credentials faster than almost anyone, and capabilities more slowly than most.

And the European evidence points the other way. The HEDOCE study of dropout and completion across 35 countries found that systems which reduce pressure – Denmark funding students beyond the theoretical timeline, the Netherlands giving students a decade from first enrolment – improve completion, because each individual setback stops being catastrophic. Students facing temporary difficulty reduce their load and carry on, rather than dropping out. No other country in Europe cuts a student’s maintenance for studying 45 credits rather than 60. Variation in pace is built into the design.

The English model prioritises pace, pressure and throughput. Wales does not have to copy it – and a review with nothing off the table is precisely the moment to say so. Most of what follows requires different rules rather than more money. That matters, because the fiscal room is real: under the Treasury’s requirement that Welsh loan terms stay broadly similar to England’s, Wales can no longer grow loan outlay faster than Westminster does. The levers Wales holds freely are grants, rules, and regulation. This paper leans on all three.

A new deal for Welsh students

The current system asks a lot of students. They take on debt that will follow them for decades. They work long hours alongside study to survive. They navigate complex bureaucracies with little support. And at the end, many leave Wales – taking the public investment in their education with them.

What do students get in return? A qualification. Some skills. Memories. But increasingly, not enough support to thrive during their studies, and not enough connection to Wales to make them want to stay.

This paper proposes a new deal – a reciprocal relationship between ambitious students and an ambitious Wales.

What Wales offers: financial support that reflects actual living costs rather than thresholds quietly frozen since 2018; flexibility to shape your own learning across institutions and modes of study; credit for contributing to Welsh communities, not just sitting in classrooms; health and housing systems that treat students as citizens, not afterthoughts; the UK's best-developed route back into Erasmus+; connections to Welsh employers, civic life and communities throughout your studies; and the chance to learn languages – including Welsh – and have that recognised in your qualification.

What students offer: commitment to use their education for the benefit of Wales and its communities; contribution to peer support, community engagement and civic life as part of their learning; skills and capabilities developed through work-based learning that benefit Welsh employers; a genuine reason to stay and build careers in Wales after graduation; and repayments that fund the next generation of Welsh students.

This is not charity in either direction. Higher education is a shared investment with shared returns. Students benefit individually from qualifications and capabilities. Wales benefits collectively from a more skilled workforce, stronger communities and graduates who contribute to civic life – and from more of the money it spends on education staying at work in Wales.

The deal should be explicit – but it should be a guarantee, not a condition. Every student would be guaranteed funded, credit-bearing opportunities to contribute – through community engagement, peer support, or civic participation – and those who take them up would unlock aspects of the loan system: graduate repayment holidays, partial cancellation for those who stay and work in Wales, or priority access to Welsh public service graduate schemes. Contribution would be recognised in qualifications through the Diploma Supplement. Nobody's core entitlement would depend on it.

This reframes the relationship from transaction to partnership. Not “what can I extract from this degree?” but “what can we build together?”

Wales has already made a version of this promise. During the passage of the Tertiary Education and Research (Wales) Act 2022, ministers set the aspiration that Welsh providers would lead the UK on learner engagement – genuine empowerment and democratic participation, students as citizens rather than consumers. Wales resolved to put into primary legislation what England buried in regulatory conditions and Scotland left to institutional discretion. The Learner Engagement Code required by Section 125 now exists – and, as we shall see in Ambition 7, it emerged rather more polite than powerful. The review is the chance to put the ambition back.

THE EIGHT AMBITIONS

These eight ambitions share a common structure. Each identifies what students want from their education, and each shows how meeting that ambition serves Wales's wider interests. They are not gifts from government to grateful recipients. They are the justification for the eight asks – a framework for partnership between students who want to succeed and a country that needs them to.

- **Every student will shape their own learning**
- **Every student will contribute to Welsh communities**
- **Every student will have what they need to thrive**
- **Every student will be supported to succeed**
- **Every student will be healthy, safe – and help Wales be healthier**
- **Every student will be able to learn languages**
- **Every student will be a partner in their education**
- **Every student will have good work**

AMBITION 1: EVERY STUDENT WILL SHAPE THEIR OWN LEARNING

Wales will offer the most flexible, student-directed learning system in the UK – enabling learners to build qualifications that reflect their goals, circumstances and developing interests, and graduating with the lowest levels of regret in the UK.

Nobody chooses higher education hoping to be a passive recipient of a fixed curriculum. Students want to pursue their interests, develop breadth as well as depth, gain practical experience alongside academic knowledge, and build a portfolio of capabilities that makes sense for the career they want. The rigid “full-time” model – 120 credits per year at a single institution in a narrow specialism – does not serve them well.

Research consistently shows that UK graduates regret their degree choices – often because they were forced into narrow specialisation too early and discovered too late that they wanted something different. Wales should aim to have the lowest graduate regret in the UK, by building a system where students can explore, adjust, and develop breadth alongside depth.

Fixing the credit system

Wales was right to decline England’s Lifelong Learning Entitlement. The LLE has so far generated basically no evidence of demand for single-module provision – the Welsh Government’s own pilots found modular courses “significantly lacked demand.” There are no incentives for universities, the fixed costs per student are ignored in the policy’s design, and there is no serious maintenance proposal: fees are chunked down by credit, but nobody thought to do the same for living costs.

Here’s the thing though. Rejecting the LLE should not mean rejecting flexibility – because there is plenty of demand for things a properly designed credit system could fix overnight:

A student’s parent falls ill. They want to reduce from 60 credits to 45 this semester to go home more often. The system says no – they’d lose maintenance as no longer “full time.”

A student runs out of money. Wants to reduce credits to earn money to eat. The system says no.

A disabled student finds the intensity too much because adjustments aren’t in place. Wants to reduce to cope. The system says no.

A student becomes a course rep, passionate about building community, but has a job and long commute. Wants to reduce credits to do the role properly. The system says no.

A student fails a module due to illness. Cannot progress, cannot just resit, cannot afford one module for a year without maintenance. The system says no.

An engineering student has a passion for music. Wants to take a 15-credit module. The system says no – the department closed for lack of market share.

And there is a distinctively Welsh anomaly to add to the list: a student taking 120 credits a year with the Open University attracts around £4,500 in maintenance because OU study is classed as part-time regardless of intensity, while the same 120 credits taken “full-time” elsewhere attract £12,590. Students have noticed. Some are quietly slowing down to speed up their income.

And the underlying rules are harsher than they look. Part-time support is not a pro-rata slice of the full-time package but a proration of a separate full-time equivalent of just £9,285 – 26 per cent below the real full-time total – with no away-from-home uplift, a meaner grant threshold (£25,000 rather than £18,370), and a 75 per cent intensity ceiling. Drop from 120 to 90 credits and you need a formal mode change onto a maximum of £6,964; sit anywhere between 91 and 119 credits and you are in a no-man’s land where neither system will have you.

The fixes are rapid, and they are rule changes rather than spending programmes – amendments to the student support regulations that Welsh ministers can make without primary legislation:

Define “full-time” as 90 credits (45 per semester) rather than 120 for maintenance purposes – allowing a student to drop one module without their income collapsing

Provide a maintenance floor, not a pro-rata cut, for students on 45–89 credits – rent and bills do not fall by a quarter because a module does. Where new loan outlay would collide with the Treasury’s equivalence ceiling, the floor can be delivered through grant – which is Wales’s to spend

Provide base-rate maintenance for reassessment-only periods – students still need to eat while they revise and resit, and the regulations already run a half-rate loan for sandwich placement years, so the mechanics exist

Make tuition liability credit-based, not time-based: a student who takes five years to reach 180 credits should owe the same as one who takes two. Slower completion should not mean higher fees

Align fee liability with credit enrolment rather than arbitrary calendar dates

Make postgraduate taught funding work the same way – credit-based fees with maintenance reflecting real intensity, replacing a single loan that currently leaves a third of full-time master’s students worried about food

Alongside the rules, an honesty requirement: Medr should require regular workload audits verifying that module demands match the credit system’s assumptions – roughly 1,200 notional hours a year – with particular attention to assessment clustering and how workload lands differently on working students, disabled students and carers. Nobody currently checks.

Learning from European innovation

Other systems have found ways to combine efficiency with genuine student choice.

At the University of Helsinki, despite significant budget cuts and a staff-student ratio of 22:1, the system sustains flexibility through structural simplicity. Across 11 faculties there are just 32 undergraduate degree programmes – but within each programme students have considerable freedom to create their own study path. A philosophy student earns 90 credits in philosophy-specific study, 75 elective credits from other degree programmes, and 15 from general studies including digital skills and academic writing. The elective requirement means interdisciplinary mixing happens automatically. And 2 credits are awarded for designing your personalised study plan with academic guidance – recognising that building a bespoke programme is itself a skill worth learning.

At Técnico Lisboa, Portugal's flagship engineering faculty, a major reform programme driven substantially by student input created a shared first year across programmes, fewer concurrent modules to reduce overload, more curricular flexibility including free electives and minors, and a requirement that all engineering programmes include 9 credits in social sciences and humanities – because engineers need to understand the societies they shape.

The result in both cases is a system where hundreds of module choices exist within a smaller number of degree programmes – without the coordination overhead, walled gardens and marketing costs of the UK's proliferating and narrowing approach.

Breadth as well as depth

Wales should embrace the principle that engineering students benefit from studying some humanities, and humanities students benefit from understanding technology and data. Cross-disciplinary credit – the right for any student to take modules outside their core discipline – should be built into the system by design.

This is not about diluting specialisation. The economy needs people who can think analytically and do practical things, who understand both technical systems and human contexts. Students who want deep specialism can still pursue it. But students who want breadth – or discover they want it – should have the option.

A Welsh approach to teaching and learning

The rise of AI makes this the moment to rethink how students learn. If assessment focuses on production – essays, reports, code – then AI can produce it. But if learning focuses on presence – being there, engaging, applying, debating, creating with others – then education becomes irreplaceable.

Wales should commit to a distinctive approach: applied and challenge-based learning, with students working on real problems with Welsh employers, communities and public services; assessment that values presence – contribution to seminars, collaborative projects, oral examination, practical demonstration; reduced reliance on high-stakes written production, which AI can game and which creates unnecessary pressure; and

credit for learning by doing – work-based learning, peer tutoring and community engagement all counting toward qualifications.

At Técnico, students argued successfully for moving away from a culture they called the “meritocracy of difficulty” – where hard work was valued but at the cost of overwork, presenteeism, and narrow focus on solving standardised problems. The reform capped exam weight at 50 per cent of final grades and shifted toward active, applied learning.

Wales could lead the UK in developing pedagogy fit for an AI era – not by banning technology but by making learning about what humans do that AI cannot: collaborate, create, apply judgment, build relationships, contribute to communities.

Dual and combined degrees across institutions

Why should a student choose between a university’s academic rigour and a college’s vocational expertise? A flexible credit system would enable students to pursue an academic major at one institution while gaining vocational qualifications at another – a business degree combined with hospitality management, an engineering foundation with construction skills, a social science programme with healthcare credentials.

This is parity of esteem made real – not a slogan about valuing vocational routes, but a credit system that lets students combine them. Medr’s position as a unified tertiary regulator – overseeing universities, colleges and apprenticeship providers – makes this achievable in ways that England’s fragmented system cannot match.

The same logic applies when life, rather than curiosity, moves a student on. Wales already has a shared credit currency in the Credit and Qualifications Framework – but a common currency is not the same as a right to spend it, and in practice credit too often dies at the door of the institution that awarded it. A common credit framework, coordinated by Medr, should make transfer the default: a student who moves institution – for caring responsibilities, cost, a course closure or a change of heart – carries their credit with them, and starts from where they got to rather than from scratch.

International mobility – first and fastest on Erasmus+

Students want international experience, and for the first time in years the door is open: the UK signed its association agreement in December 2025 and rejoins Erasmus+ from the 2027 programme call, with funded activity from the 2027/28 academic year. The question for Wales is no longer whether to argue for association but whether to be ready before anyone else – and Wales starts with an advantage nobody else has, because Taith has kept the infrastructure, partnerships and appetite alive.

Wales should move first and fastest: be the first UK nation with institutions ready to participate at full scale when the 2027 call opens; actively recruit inbound exchange students, who enrich the learning environment and become ambassadors for Wales; and settle Taith’s future as a complement to Erasmus+ rather than a casualty of it – so that young people in Wales genuinely can live, study and work in Europe.

A classification system that sees the whole graduate

Flexible learning only works if employers can understand what a graduate has achieved. The traditional UK degree classification – first, 2:1, 2:2, third – tells employers almost nothing about what a graduate actually studied or what capabilities they developed.

Wales should commit to a new approach built on the Diploma Supplement – a European transparency tool that accompanies a degree certificate with detailed information about what the graduate studied and how, what alternative credit they acquired, what languages they learned, what community contribution they made, and what international experience they gained.

Wales could be the first UK nation to move beyond the crude classification system to something that actually describes the whole graduate. That would signal seriousness about flexibility, support graduate mobility, and give Welsh qualifications a distinctive advantage.

What this means in practice

- Credit portability across Welsh institutions, with Medr coordinating a common framework
- Dual and combined degrees across the university-college boundary – parity of esteem in practice
- Cross-disciplinary credit by right – engineers studying humanities, humanities students studying data
- Full-time threshold of 90 credits, a maintenance floor at 45–89 credits, and base-rate support for reassessment periods
- Credit-based tuition liability – the same debt for the same credits, whatever the pace
- Postgraduate funding rebuilt on the same credit logic
- Workload verification so credits mean what they claim
- Applied and challenge-based learning as the Welsh pedagogical approach, with assessment that values presence
- First and fastest on Erasmus+, with Taith's future settled
- The Diploma Supplement for all graduates
- Lowest graduate regret in the UK as a measurable ambition

AMBITION 2: EVERY STUDENT WILL CONTRIBUTE TO WELSH COMMUNITIES

Every student in Wales will have structured opportunities to contribute to and connect with the communities where they study – building relationships that give them reasons to stay.

Education should matter beyond the classroom. The students who get most from university are often those who engage most – with their course, their peers, their institution, and their community – making a difference, building networks, developing professional relationships, and connecting their learning to the real world.

The 27 per cent graduate outflow from Wales is not inevitable. It reflects, in part, a failure to connect students to place during their studies. A student who has worked for a Welsh employer, contributed to a Welsh community and built relationships in a Welsh town has reasons to stay that a student who commuted to campus and left has not. Retention is built, not demanded – “leaving for the degree, staying for the life” will always beat guilt-tripping the leavers.

A civic guarantee

If Wales is serious about connecting students to communities, it should make that connection part of the deal – as a guarantee, not a test. Every student would be guaranteed funded, credit-bearing opportunities to contribute during their studies: community engagement with local organisations, public services or civic initiatives; peer support – tutoring new students, mentoring struggling peers, leading course representation; work-based learning with Welsh employers; or civic participation in student governance, societies and democratic structures.

The guarantee would be reciprocal. Students who take it up would unlock aspects of the loan system – graduate repayment holidays for those who stay in Wales, partial cancellation for graduates working in Welsh public services, priority access to graduate schemes – and recognition in the Diploma Supplement, making contribution visible to employers.

Three design principles matter. First, nobody’s core entitlement depends on it – maintenance, fee support and student rights are unconditional; the guarantee adds rewards, it never gates the basics. Second, it is built around real lives: paid work with Welsh employers counts, caring counts, and the credit system – not a new bureaucracy – does the verifying, with the same adjustments for disabled students and carers that apply to any other credit. Third, the opportunities are funded – providers and communities are resourced to host contribution properly, so it never becomes unpaid labour dressed as citizenship.

The reciprocity matters. Communities gain from student contribution. Students gain credit, connections, and financial benefits. Wales gains graduates who know and care about the places where they studied. And the scale is real: with 111,755 undergraduates enrolled at Welsh providers in 2024–25, a universal ten-credit contribution – 100 hours, just one-twelfth of the 1,200 notional hours in a 120-credit year – would generate around 11.2 million hours of structured civic capacity every single year. No other policy, at any price, buys Wales that.

Subject-level associations

The European model of subject-level associations – common from Helsinki to Heidelberg – shows what is possible. These are not just academic societies but genuine communities combining social activities and belonging, career development and employer connections, academic representation, and civic engagement.

At Técnico Lisboa, academic societies sit alongside each degree programme and lead on representation, social activity and careers work – appearing prominently on programme webpages. In Finland, every new student is connected to trained peer tutors coordinated through these associations, and the sense of community in student surveys is far higher than anything equivalent in the UK.

Wales should expect every programme to have an associated student community – funded, recognised, and integrated into the student experience.

Peer contribution as learning

Students who support other students are developing leadership, communication and organisational capabilities. Course representatives gathering feedback and advocating for change. Society leaders organising events and managing teams. Peer tutors helping struggling students succeed. Mentors guiding new arrivals through transition.

All of this is currently invisible to the credit system. Making it visible – through credit-bearing recognition – both values the contribution and encourages more of it.

Following Portugal's model, student representatives should get protected status: academic adjustments for representative duties, justified absences for preparation, consultation and training, assessment rescheduling without penalty, and academic credit or remuneration for governance roles. Dutch students routinely take “board semesters” – running student associations for credit, explicitly accommodated in the funding system. Wales could lead the UK in recognising that what students do for each other and their communities is genuinely educational.

Placements that build retention – and a pipeline that keeps its promises

Every programme should offer structured opportunities to work with Welsh employers – not as an afterthought but as a core part of the qualification. Properly supervised, properly paid where appropriate, and designed to build relationships that outlast graduation.

The public sector has particular opportunities – and particular obligations. NHS Wales, local authorities, schools and public services all need capable people, and graduate training schemes that build on placement relationships could systematically connect study to Welsh employment. But the deal has to cut both ways. This year, “streamlining” left newly qualified nurses – many carrying two-year work-in-Wales bursary obligations – chasing jobs that existed for barely two-thirds of them, while NHS Wales spent £89m on agency staff. Paramedic commissioning simply stopped. If Wales trains students for its public services, ties them in with bursary conditions and asks them to plan their lives here, it must hire them: a Welsh graduate guarantee for nursing, as RCN Wales has demanded, and a wider principle that no bursary-tied course runs without a hiring commitment behind it. Nothing empties the “stay in Wales” promise faster than a system that trains people for jobs it then declines to provide.

What this means in practice

- A civic guarantee for all students – funded, credit-bearing contribution opportunities, with loan benefits for those who take them up and no conditions on core entitlements
- Credit-bearing community engagement in every programme
- Subject-level associations funded and recognised for every programme
- Recognition for peer leadership – academic credit for tutoring, representation and mentoring
- Protected status for student representatives with academic adjustments
- Guaranteed placements with Welsh employers – paid where the work has value
- A graduate guarantee for bursary-tied public service courses
- Graduate retention incentives – partial cancellation, repayment holidays and guaranteed routes for those who contribute and stay

AMBITION 3: EVERY STUDENT WILL HAVE WHAT THEY NEED TO THRIVE

No student in Wales will face poverty as the price of participation – with financial support that reflects actual living costs and cross-government action on the expenses that squeeze student budgets.

Nobody can realise their potential hungry, exhausted from overwork, or anxious about rent. Financial security is not a luxury – it is the foundation that makes everything else possible. And in Wales the evidence is stark: 8 per cent of Welsh students experienced homelessness during the cost of living crisis, a quarter live on £50 or less a month after rent and bills, and around two-thirds of full-time students UK-wide now work in term time – with the best-supported students still working, because the money does not stretch.

Defend the architecture first

Before fixing what is broken, the review needs to be clear about what is not. Diamond's central design – every Welsh student gets the same total maintenance, with only the grant/loan mix means-tested – is the most progressive settlement in the UK, and it demonstrably works. In 2026/27 that means £12,590 for a student living away from home outside London: a universal £1,020 base grant, a means-tested grant of up to £8,260, and loan filling the balance – the same total at every income from £18,370 to £59,200 and beyond. The last joint Student Income and Expenditure Survey found Welsh full-time students carrying commercial debt of £694 on average against £3,989 for their English peers – overdrafts, credit cards and arrears, the debts that follow graduates regardless of earnings. The medians were zero. That is not an accident. It is what happens when the poorest students are not forced to banks to bridge the gap, and when families who cannot or will not contribute do not condemn their children to hardship.

The obvious “saving” available to a fiscally squeezed review is to means-test the total – England's model. It should be resisted, loudly. If resources need concentrating, concentrate the grant within the universal total: a richer grant mix for the poorest, more loan for the rest, and a total that never falls below what participation actually costs. That is Diamond's own logic. Abandoning it would trade the UK's best-functioning student finance system for England's worst problems.

Restore the promise – and know the number

Diamond pegged maintenance to the National Living Wage – 37.5 hours a week for 30 weeks. That link has been quietly dropped in favour of forecast CPI upratings that have undershot the inflation students actually faced, and the gap is compounding: at

2026/27 rates, support sits £1,709 below the wage-linked benchmark of £14,299 (1,125 hours at the £12.71 National Living Wage), funding about 26 and a half weeks of a 30-week year. Meanwhile fiscal drag does the regressive work no minister has to announce: the £18,370 threshold for the full grant has been frozen since 2018 – it would be around £25,000 if uprated – and the grant:loan mix has drifted from 32:68 to 23:77 without a single policy decision. The average Welsh maintenance loan rose 59 per cent between 2020 and 2025, exceeding England's for the first time. That is not generosity. That is grant quietly becoming debt.

Diamond was honest, too, about its own limits – 37.5 hours for 30 weeks was already 75 hours short of the 1,200 notional hours a full credit year demands. So the review should start from evidence rather than affordability-first guesswork: commission a Welsh minimum income standard for students, adapting the HEPI/Loughborough methodology to Welsh circumstances – disaggregated by mode, living arrangements and region, updated every two years. If the answer is that current support is inadequate – and it almost certainly is – Wales can then make honest choices: restore the wage link with automatic uprating, unfreeze the thresholds, deploy grant where the Treasury's loan ceiling binds, and offer graduate repayment holidays for those facing caring responsibilities, low earnings or retraining. Whatever the constraints, at least we would know the gap we were choosing to leave.

Cross-government cost reduction

The £1 bus fare shows what integrated thinking looks like – and transport is the quiet giant of student poverty: around 40 per cent of college hardship spending goes on it, and half of Welsh learners report missing classes because of unreliable transport. A cross-departmental student cost reduction strategy would identify the expenses that squeeze student budgets and systematically address them: permanent universal student transport discounts, energy support for student households, digital access guarantees, and food security initiatives. Student poverty cannot be solved through loans alone – but a small country can solve it across portfolios.

Housing costs that relate to reality

Student rents across the UK's main markets rose by 14.6 per cent in just two academic years – from £6,520 to £7,475 a year. The Welsh Government has housing powers Westminster does not use – and is now committed to capping rent increases and strengthening renters' rights. The task is to make sure students are designed in rather than left as an afterthought: rent measures that cover purpose-built student accommodation and link costs to maintenance levels, housing impact assessments before universities grow recruitment, and attention to the contract-signing lead times and joint-contract rules that punish students specifically.

What this means in practice

- Diamond's flat-rate architecture defended – concentrate grant within the universal total, never means-test the total itself

- A Welsh minimum income standard for students, updated biennially, as the review's evidence base
- The wage link restored with automatic uprating – and the thresholds unfrozen
- Graduate repayment holidays for graduates facing particular circumstances
- Cross-government cost reduction – transport, energy, digital access, food
- Rent measures that include students and PBSA by design
- Work that supports study – providers required to accommodate working students in timetabling and assessment (see Ambition 8)

AMBITION 4: EVERY STUDENT WILL BE SUPPORTED TO SUCCEED

Every student will receive structured support to develop the academic, social and practical capabilities they need to thrive – not as remediation but as a core part of becoming a student.

Students want to be challenged – to develop, to grow, to master difficult things. But ambition needs scaffolding. Students arrive at higher education more diverse in background, preparation and need than ever before. The assumption that everyone will figure it out – that families will pass on the unwritten rules, that schools will have prepared everyone equally – is wrong. Just 39 per cent of free school meal pupils progress to Level 3 compared to 72 per cent of their peers, and the destinations gap persists well beyond entry. These are not differences in talent or ambition. They are differences in support, knowledge and social capital.

And it starts before arrival. The Diamond evaluation found that only 10 per cent of Year 12 and 13 learners felt they understood student finance well – and among those undecided about university, 60 per cent did not understand it at all. The most generous system in the UK is being turned down by the people it was designed for, because nobody has told them what they are entitled to. After seven years, that is not a communications problem. It is a design problem – and it belongs in the review alongside reform of Seren, refocused so that support for ambitious learners builds pathways to Welsh universities, not just away from them.

Knowing your rights

Following Poland's model, all students should receive comprehensive training on their rights and responsibilities within 14 days of starting. Not an optional freshers' week session – mandatory education covering consumer rights, finance entitlements, representation opportunities, complaints procedures, support services, and collective responsibilities.

Crucially, this training should be developed and delivered by the students' union. When every graduate understands both their rights and responsibilities, Wales will transform not just higher education but society.

Student tutoring at scale

Finnish universities run comprehensive peer tutoring programmes where continuing students support new arrivals throughout their first semester and beyond. Tutors are trained by students' unions, allocated 5-15 new students each, and act as social

facilitators, student life mentors and academic guides – organising welcome activities, campus tours and ongoing support.

The evidence on belonging is striking. Finnish students rate supporting each other, learning from talking with other students, and working comfortably together far higher than UK equivalents. Research consistently shows that peer mentoring improves social and academic integration, reduces dropout intention, and builds belonging – particularly for first-in-family students.

Wales could mandate this. Every new student connected to trained peer tutors, coordinated through students' unions with dedicated funding. Not a nice extra – core infrastructure. The ubiquity of the approach also creates a vehicle for delivering contemporary agendas – mental health awareness, academic integrity, accessing support – through personal, peer-led conversation rather than generic online modules.

Co-convened student services

Student services in UK universities are typically governed like any other university department – managed by senior staff, accountable to institutional hierarchies, with student input limited to consultation. This creates a gap between what students need and what services provide.

Wales should pilot a different model: co-convened student services, either separately governed from the rest of the university with joint staff-student oversight, regionally organised across multiple institutions with students as genuine partners in governance, or co-located with students' unions with shared accountability.

This is not about removing professional expertise. It is about ensuring that services are designed and governed in partnership with the students they serve. Mental health services, disability support, careers guidance, financial advice – all could benefit from governance structures that give students genuine power, not just feedback forms.

Credit-bearing transition

European systems dedicate significant curriculum time to helping students develop as students. At Helsinki, 2 credits are awarded for designing your personalised study plan with academic guidance. There are credits for digital skills and academic writing. The hidden curriculum is made visible and given the time it deserves.

Wales could require all programmes to include credit-bearing first-year development – not separate from the discipline but integrated with it.

Space to learn from mistakes

The UK has the youngest undergraduate graduates in Europe – not because our students are better prepared, but because we compress education into the shortest possible time. As the evidence above shows, the compression carries a health cost and a learning cost.

Countries that prioritise completion over speed consistently show better outcomes. Wales should build in space to develop: pass/fail options for first-year modules not counting toward final classification, multiple assessment attempts, formative feedback that supports development, and first-semester debt cancellation for those who discover higher education is not right for them.

What this means in practice

- A finance-information guarantee – nobody decides against university in ignorance of what Wales would actually give them – and a Seren refocused towards Welsh universities
- Mandatory rights training within 14 days of starting, delivered by students' unions
- Student tutoring at scale – every new student connected to trained peer tutors
- Co-convened student services – piloting separate governance or regional organisation with genuine student partnership
- Credit-bearing first-year development – academic skills, navigation and personal development
- Space to learn from mistakes – pass/fail options, multiple attempts, formative feedback
- First-semester debt cancellation for students who withdraw early

AMBITION 5: EVERY STUDENT WILL BE HEALTHY, SAFE – AND HELP WALES BE HEALTHIER

Wales will take a whole-system approach to student health and safety – using devolved powers to ensure students can access healthcare, live free from harassment and violence, and thrive, while harnessing their energy and skills to benefit Welsh communities.

Students cannot thrive if they are unwell, struggling to find a GP, unsafe on campus, or living in inadequate housing. And Wales cannot thrive without the contribution that healthy, engaged students can make to Welsh health and social care. Only 20 per cent of students report “very good” health compared to 48 per cent of the general population; 27 per cent say their health has worsened since starting their studies; 32 per cent of Welsh students were unable to pay rent at some point in 2022-23.

In England, student health and housing fall between departments with nobody taking responsibility. Wales can be different – though most of what follows is a cross-government consequence of the review rather than something the review panel can deliver itself.

A national student health strategy

NHS Wales is devolved. The Welsh Government can mandate coordination between health boards, universities and local authorities around student health needs: dual GP registration enabling students to access healthcare at both university and home addresses; fast-track disability assessment, addressing multi-year backlogs that prevent timely support; and clear guidance that formal diagnosis is not required for reasonable adjustments.

Safe as well as well

Safety belongs in the same frame as health – and here Wales has a gap it should be honest about. England’s regulator now runs a dedicated registration condition on harassment and sexual misconduct, with definitions, bans on silencing NDAs, rules on staff-student relationships and real enforcement. Wales has a general welfare condition in which sexual violence appears in a parenthesis, a self-assessment framework that providers never have to submit, and – tellingly – no Welsh prevalence data at all. Providers are being asked to evaluate their arrangements against a problem they have never measured, in a UK context where students are roughly twice as likely as any other group to experience sexual violence, stalking and abuse.

The fixes are neither expensive nor complicated. Medr should commission an all-Wales prevalence survey – the single cheapest intervention that would transform what the

welfare condition can do. Regulatory guidance should be brought up to at least the standard England now sets, including on staff-student relationships. The OIA's forthcoming good practice framework on handling reports – which applies in Wales – should be adopted as mandatory. And the VAWDASV self-evaluation framework's own principles of transparency and co-production should be enforced in practice: survivors and students' unions in the room, not consulted after the fact.

Biennial national research on student mental health and wellbeing

Wales should commit to comprehensive national research on student mental health and wellbeing every two years. Not institutional surveys with inconsistent questions and limited comparability, but a properly designed national study that tracks trends over time, identifies emerging issues, compares Welsh students with those elsewhere in the UK and Europe, and evaluates whether interventions are working. Without good data, policy is guesswork – on wellbeing just as on violence.

Students contributing to Welsh health

Students represent energy, skills and time that could benefit Welsh health and social care. Credit-bearing contribution could include placements in NHS Wales, volunteering with health charities, peer support for mental health, and community health initiatives.

This is about reciprocity. Wales invests in students' health. Students contribute to Wales's health. The skills developed – communication, empathy, teamwork – benefit graduates whatever career they pursue.

Disability rights as student rights

Every year, countless disabled students arrive with hope and ambition, only to find themselves navigating a system of “support” that demands disclosure, documentation, negotiation, repetition, and often silence.

Wales should require institutions to facilitate advocacy embedded close to academic departments, co-located with students' unions where possible; mandate Disability Access Strategies co-designed with students, backed by budget and actively monitored; and brief all students on disabled students' rights – creating pressure from all sides to comply with the law.

Housing as infrastructure

Student housing is not just a market. It is infrastructure that enables or prevents educational participation. Wales should require housing impact assessments before universities increase recruitment, set quality standards for all student accommodation under a single code with inspections and transparency, ensure student voice in the governance of purpose-built providers, and link costs to what students can actually afford.

What this means in practice

- A national student health strategy coordinating NHS Wales, universities and local authorities
- An all-Wales prevalence survey on harassment and sexual violence – and regulation raised to match England’s floor
- The OIA framework on handling reports made mandatory
- Biennial national research on student mental health and wellbeing
- Credit-bearing health and care contribution
- Dual GP registration at both university and home addresses
- Fast-track disability assessment with clear guidance that diagnosis is not required for adjustments
- Disability Access Strategies co-designed with students, backed by budget, actively monitored
- Housing impact assessments and a single housing quality code with student voice

AMBITION 6: EVERY STUDENT WILL BE ABLE TO LEARN LANGUAGES

Every student will have the right to use some of their credit on language learning – including Welsh – recognised in their qualification and supporting both personal development and Wales’s linguistic ambitions.

Students in Wales should be able to pursue their ambitions through the medium of Welsh if they choose. And students who arrive without Welsh – or without any second language – should have the opportunity to develop language skills and have that recognised in their qualification.

This ambition has no equivalent elsewhere in the UK – it is distinctively Welsh, and it is how tertiary education takes its share of the national mission for a million speakers and the school system’s journey towards half of learners in Welsh-medium education.

The right to language credit

Every student should have the right to use some of their credit on language learning, within their alternative credit acquisition allowance. That means Welsh, for students who want to learn the language or develop existing skills; European languages, supporting mobility and Erasmus+ participation; community languages, recognising Wales’s diverse population; and languages for professional purposes – healthcare Welsh, legal Spanish, business Mandarin.

Language modules should be available on a pass/fail basis to reduce pressure while still recognising achievement, recorded on the Diploma Supplement so the skills are visible to employers.

This is about creating pathways for everyone. Students who arrive without Welsh could leave with it – a distinctive outcome that no English university can match. Students heading for Erasmus+ could prepare with relevant language learning. Students from multilingual backgrounds could develop and accredit their existing skills.

Welsh-medium provision across subjects

Beyond the universal language option, Wales needs to expand Welsh-medium provision across all subjects. For students who want to study their entire programme through Welsh, that should be possible in every major discipline.

The current picture is heading the wrong way: just 0.2 per cent of FE college learning activities run entirely through Welsh compared to 15.9 per cent in school sixth forms – and as more learners shift from schools to colleges at 16, opportunities to study in Welsh are shrinking exactly where participation is growing.

Aspiration has been the policy for a decade, and the numbers have gone backwards anyway – which is why the targets need to be binding, set by Medr with funding attached, rather than another round of encouragement. And they need to be built on evidence: nobody currently publishes systematic data on where Welsh-medium provision exists, where demand for it goes unmet, or where learners who could study through Welsh are defaulting to English because the option was never visible to them. Without good data, policy is guesswork – on language just as on wellbeing.

This requires investment. Welsh-medium provision has higher costs per student. But those costs need to be met if Wales is serious about both the Welsh language and graduate retention – and the review should treat Welsh-medium capacity as a protected national asset, not a line item for restructuring.

Keeping the language you arrived with

There is also a quieter loss the system barely notices. Every year, students leave Welsh-medium schools fluent, having been educated through the language for well over a decade – and arrive at institutions where every lecture, seminar, assessment and social space defaults to English. Fluency fades fast when a language has nowhere to live, and it fades at exactly the moment the Cymraeg 2050 mission needs those speakers most. Language maintenance should be designed in, not left to luck: credit-bearing options to keep studying partly through Welsh whatever the subject, Welsh-medium academic and social spaces on every campus – UMCA at Aberystwyth shows what a thriving Welsh-medium student community looks like – and a proactive offer made to Welsh-medium school leavers at enrolment, rather than an expectation that they will go looking for it.

What this means in practice

- Right to language credit – every student able to use some credit on language learning, pass/fail, recorded on the Diploma Supplement
- Welsh language modules for all – pathways for learners at every level
- Binding targets for Welsh-medium FE provision with additional funding to cover higher costs
- Language maintenance for Welsh-medium school leavers
- Protected staff capacity – Welsh-medium teaching staff shielded from restructuring
- Better data on Welsh-medium provision and demand

AMBITION 7: EVERY STUDENT WILL BE A PARTNER IN THEIR EDUCATION

Students will have genuine power over the decisions that affect them – through a Learner Engagement Code with teeth, consent not just consultation, and students' unions with funded independence.

Students do not just want to receive an education. They want to shape it. They want their feedback to matter, their representatives to have power, and their voices to be heard in the decisions that affect their learning, their services, and their communities. The starting point is not flattering: on a comparative league table of student rights across Europe, Wales sits 41st of 50 systems.

When the Tertiary Education and Research (Wales) Act 2022 was being drafted, the inclusion of a mandatory Learner Engagement Code mattered. Wales resolved to put into primary legislation what England had buried in regulatory conditions and Scotland had largely left to institutional discretion. Section 125 requires a code about learner involvement in decision-making that is not optional or best practice – it is law.

The Code now exists – and it emerged softer than the legislation deserved. Nine worthy principles, but no rights; examples and expectations that, in Medr's own words, do not form part of the regulatory requirements; no funding floor for students' unions beyond a footnote pointing at guidance from 2014; and welfare action plans thinned from annual to biennial along the way. On nearly every contested point in consultation, where students asked for more and institutions warned of burden, the final framework moved the providers' way. Wales legislated for leadership and regulated for politeness.

Part of the problem is that one Code is being asked to cover everyone. The Act gave Medr the power to set different conditions for different provider types – and it chose not to use it for the core conditions. So HE students, who are adults in contractual relationships with independent unions and access to the OIA, get engagement expectations calibrated to the capacity of the smallest provider in the system, while FE learners get a framework designed around structures many of their colleges simply do not have. The fix does not require reopening the framework: the HE-specific and FE-specific briefing documents now being written are where differentiation can happen – HE expectations pitched at consent, funding floors and a formal assurance role for students' unions; FE expectations built around learner voice structures that actually exist in colleges, with the safeguarding obligations that younger learners need.

The window has not closed. Medr must keep the Code under review, the operational guidance and templates that will determine what compliance actually means are being written between now and routine monitoring in October 2027, and the funding review gives the next government the occasion to insist. Nobody benefits from a Code that is weak or vague – and if the review is serious about a system for Wales, learner partnership is where Wales can most cheaply lead the UK.

From “should” to “must”

The most effective student engagement systems share common features. They are comprehensive – covering everything from module evaluation to strategic planning. They are backed by resources – student representatives are not expected to volunteer countless hours without support. And they are consequential – with real consequences when institutions fail to comply.

A strengthened Code should set out clear standards – not aspirations but requirements. Providers would either comply or publicly explain why they have chosen an alternative approach that delivers equivalent or better outcomes. Explanations would need to be evidence-based, time-limited, and subject to scrutiny. Medr would assess compliance annually through triangulated evidence – student surveys, complaint patterns, representation effectiveness metrics, and crucially, the views of student representatives themselves, with students’ unions given a formal route into the annual assurance process rather than relying on providers marking their own homework.

Module evaluation as universal engagement

The Estonian approach shows what is possible when feedback becomes embedded in academic culture. Making evaluation mandatory for module completion ensures universal participation. But it must be meaningful: published results, visible where students choose modules rather than buried in committee papers; documented actions; closed feedback loops where students see their input matter.

Wales should adopt Estonia’s three-part structure – teaching quality, student engagement, and learning outcomes – recognising that educational success requires both good teaching and student effort.

Consent, not just consultation

Wales could be bold. Following the Dutch model, some decisions should require student consent, not just consultation.

Matters requiring consent (cannot proceed without student agreement): teaching and assessment regulations; significant programme structure changes; student charter content; quality assurance procedures; representation structures; and elective module options for the following year.

Matters requiring consultation (mandatory input but not binding): budget allocations affecting student services; campus development plans; strategic planning; marketing and recruitment strategies.

Matters governed by a council of staff and students: student accommodation; student employment; student services and mental health; harassment and sexual misconduct policy.

Matters delegated to the students’ union: student engagement and representation; student activities and volunteering.

No other stakeholder group would accept purely advisory input on the regulations governing their own activities. Why should students?

Funded independence

Latvia mandates that students' unions receive a fixed minimum share of institutional income, and minimum funding was agreed as part of the Australian Universities Accord. The Welsh Code should set a minimum as a percentage of income or fees, ensuring student bodies have resources to train representatives, gather evidence, and hold institutions accountable.

Funding should come with independence safeguards: no conditions that compromise advocacy, no reductions for challenging decisions, protected status even when – especially when – relationships become difficult, and written agreements protecting core funding during institutional financial difficulty. That last point is not hypothetical. In a sector where six of eight institutions have been in deficit, a framework with no funding floor means the independent voice is easiest to cut at exactly the moment it is most needed.

Complaints as learning – and protection that exists before you need it

Complaints are a really important part of student engagement. The OIA's Good Practice Framework should be mandatory, not optional. A proper system treats complaints as valuable intelligence, not irritations to be managed. Wales should go further: automatically converting failed appeals containing service complaints into formal complaints; compensation to all affected students when patterns emerge, not just those who complained; and annual publication of what providers learned from complaints and what they are doing about it – signed off by the students' union.

Partnership also means protection when things change. In a restructuring decade, learner protection plans that exist only when Medr requests one are protection for providers, not students. Every provider should hold a standing protection plan with clear teach-out standards – because the students most affected by closures are the least able to wait for a regulator to ask nicely.

What this means in practice

- The Code strengthened at its first review – comply or explain, with public accountability
- Students' unions given a formal route into annual assurance – triangulated assessment, not tick-box returns
- Module evaluation that drives change – published results, documented actions, closed loops
- Student consent for regulations, programme changes, and quality procedures
- Joint governance for accommodation, employment, and student services

- Funded independence for students' unions – a minimum share of income, protected during financial difficulty
- Complaints as learning – automatic escalation, collective compensation, public reporting
- Standing learner protection plans with teach-out standards at every provider

AMBITION 8: EVERY STUDENT WILL HAVE GOOD WORK

Wales will be the first UK nation with a national strategy for student employment – treating the work students already do as part of the tertiary system rather than a distraction from it: planned, protected, recognised in qualifications, and connected to the careers students actually want.

Students work. The evidence earlier in this paper has already settled that – two-thirds of full-time students in term time, with working students averaging 50 hours a week of work and study combined. The Student Working Lives research at the University of Central Lancashire adds the texture: students working 18 hours a week on average – home students 23 – overwhelmingly in low-paid roles unrelated to their course, with over half working to pay bills and 29 per cent to pay fees. The question the system never asks is not whether students should work, but whether the work is any good.

Because work, in the right dose, is developmental. Wonkhe polling of over 18,000 students finds that those doing a moderate 11–20 hours of paid work a week are the most career-confident group of all – more confident than those doing none – while those working 21-plus hours fall below even the non-workers, too depleted to do the things that build career capital. That matches Eurostudent's finding that paid work becomes actively harmful beyond 20 hours a week. Work is not the enemy of study. Unplanned, unprotected, unrecognised work is.

No part of the UK has ever planned for this. As students' hours have grown, Westminster's employment rights reforms have proceeded as if students do not exist – zero-hours protections designed without the semester in mind, seasonal work left vague, unpaid internships kicked into the long grass, and a Department for Business and Trade that regards students as somebody else's problem. Other countries decided differently. Slovenia runs a dedicated student work regime – študentsko delo – with flexible student contracts, agencies that list jobs and enforce labour law, and a small levy on student wages that funds student organisations. Germany has tax-free minijobs and Werkstudent contracts capped at 20 hours in term time. France and Belgium run dedicated student contracts with reduced hours and social contributions. Each system, at some point, sat down and planned the volume, quality and suitability of student work as part of the overall student experience – in recognition of what the credit system assumes about study hours. The UK never has.

A national student employment strategy

A word of candour first: employment law is reserved to Westminster, so Wales cannot legislate a Slovenian-style contract regime. But most of what makes student work good or bad in practice is not reserved – who employs students, how study is timetabled around work, whether working is punished by the maintenance system, what standards public money demands of employers, and whether the learning that work produces is

ever recognised. Those levers Wales holds, and a small country can pull them in one direction at once.

Wales should write the UK's first national student employment strategy – cross-government, in the same machinery proposed for health and housing. It would be built around the credit system's assumptions: if a full credit load implies 1,200 notional hours, the strategy should be honest about how many working hours fit alongside it, aim policy at the developmental 11–20 hour zone, and connect to the maintenance reforms in Ambition 3 so that nobody is forced past the 20-hour threshold just to eat. And where the levers are reserved, Wales should make the case to Westminster with one voice: guaranteed-hours rights that flex with semesters, shift-notice protections that work for exam periods, students able to return to a job after a placement rather than lose it, and an end to the unpaid internship.

Universities and students' unions as exemplar employers

The sector does not have to wait for anyone. Universities and students' unions are already significant employers of students – and could be far better and far bigger ones. Every student job on campus should involve real recruitment – a person spec, an interview, feedback for the unsuccessful, so the process itself is careers education. Terms and conditions should beat the legal minimums, with students able to trigger predictable hours when circumstances demand, proper training and appraisal, and a structured exit that helps students name and evidence what they learned. There is money in this as well as principle: institutions spending heavily on agency temps are leaking VAT and margin to external firms for work students could do – resource that should be retained within the university community and spent on doing student employment properly. Targets should follow – more student jobs, and deeper ones, with student supervisor and manager roles rather than a permanent bottom rung. And once campus standards are established, they should spread outward through procurement: suppliers, contractors and local employers who want access to the student market should meet the good work standards the institution sets itself.

Careers in the course, not in the corner

The same polling that found the relational engine of belonging found something the sector keeps mishearing. When students describe what built – or failed to build – their career confidence, references to “my course” and “my lecturers” outnumber references to the careers service by roughly ten to one, and the graduates in the Office for Students' own research complain not that careers services are absent but that they are generic: nothing industry-specific, nothing course-specific, nothing person-specific. The students with the highest career confidence most often name credited provision – placements, professional practice modules, credited internships – while the most disconnected have simply never had anyone on their programme draw a line from their studies to their future.

Many universities' careers services do these things often in partnership with programme teams – but students report that often what are regarded as “extra curricular” activities are deeply developmental and valuable, but not recognised in the framework of their degree.

Wales's credit reforms make the fix available: career preparation belongs inside the credited degree, owned by course teams – and the subject-level associations proposed in Ambition 2 are careers infrastructure, not just community. Across Europe, student-run and subject-level careers activity operates at a scale central services never reach – Denmark's student-run engineering careers fair, the Dutch study associations whose fairs and case competitions became permanent university infrastructure, Krakow's SU-linked job placement office running since 1998. Students trust students – and the association that runs the careers fair is also the community that makes the future feel plannable.

Recognising the work students already do

Ambition 3 promised that providers would accommodate working students in timetabling and assessment – this is where that promise gets its machinery. Timetables published far enough ahead to arrange shifts, assessment deadlines that do not cluster blindly, and no penalty – formal or cultural – for earning. Course teams should talk to students about their jobs: the UCLan team's core insight is that the part-time work students already do is a vast unread text of transferable skills, and that assessment can be geared to surface what employment is teaching. The credit system should then do what it does everywhere else in this paper: recognise the learning, through work-based learning credit for the job a student already holds, not just for placements the university arranges.

And because Wales is mandating the Diploma Supplement for all graduates, it should use all of it. Section 6.1 – the space European universities use systematically to record verified work, leadership and volunteering – should come with a national Welsh catalogue of what counts and how it is verified, on the German model of a 90-hour threshold. The attributes employers say graduates lack – resilience, initiative, positive attitude – are precisely the ones built stacking shelves, managing a society budget and holding down a bar job through exams. A vocabulary gap should not be allowed to become a recognition gap.

Work that keeps graduates in Wales

Finally, student employment is graduate retention policy by another name. The UCLan research puts it plainly: a student given a positive impression of work in a region while they study is more likely to stay – in that sector, in that company, in that region – once they qualify. Every good student job with a Welsh employer is a relationship that outlasts graduation; every exploitative one is a reason to leave. A country losing 27 per cent of its graduates cannot afford to treat the hundreds of thousands of hours its students work each week as none of its business. Good work while studying is how “leaving for the degree, staying for the life” gets built shift by shift.

And sometimes the best job in Wales will be the one a graduate creates. If the binding constraint on Welsh growth is a shortage of high-productivity firms rather than a shortage of skills – and the innovation money that might change that keeps flowing elsewhere – then graduate enterprise belongs in the deal too: credit-bearing entrepreneurship within the flexible degree, incubation and workspace on every campus, routes to early-stage finance that do not require moving to London, and the

civic guarantee's retention benefits extended to graduates who start businesses in Wales. Finland's student-run entrepreneurship societies and Iceland's student-managed innovation centres show that students themselves, properly resourced, are the best recruiters for this – another job for funded subject associations.

What this means in practice

- The UK's first national student employment strategy – cross-government, designed around the credit system's assumptions about study hours and the developmental 11–20 hour zone
- Good work standards for every student job on campus – real recruitment, conditions beyond legal minimums, predictable hours on request, training, appraisal and structured exit
- More student jobs, deeper ones – institutional targets, student supervisor and manager roles, agency spend brought in-house and reinvested
- Good work standards spread through procurement to suppliers, contractors and local employers seeking access to the student market
- A single Welsh case to Westminster on reserved matters – semester-flexible guaranteed hours, shift notice that respects exams, the right to return after placement, an end to unpaid internships
- Timetabling and assessment that accommodate working students – advance timetables, de-clustered deadlines, no penalty for earning
- Credit for the learning in the jobs students already hold – and a Welsh Section 6.1 catalogue so work, leadership and volunteering appear, verified, on the Diploma Supplement
- Career preparation in the credited degree, owned by course teams – with subject associations resourced as careers infrastructure
- Student employment designed as graduate retention policy – good work with Welsh employers during study as the reason to stay after it
- Graduate enterprise backed as growth policy – credit-bearing entrepreneurship, campus incubation, routes to early-stage finance, and civic guarantee benefits for graduates who start businesses in Wales

STUDY IN WALES: TELLING THE STORY

If Wales is going to offer the best student experience in the UK, it needs to tell that story.

A “Study in Wales” portal should showcase what makes Welsh higher education different: flexibility to shape your own learning; rounded qualifications recorded in the Diploma Supplement; credit for community contribution and peer support; Erasmus+ opportunities; the chance to learn languages including Welsh; connections to Welsh employers and communities; support systems that help students thrive; and students as partners in their education.

It should be aimed at prospective students across the UK and beyond – those who might not have considered Wales, those who do not yet know what Welsh institutions offer, those looking for something different from the narrow specialisation and competitive pressure of English higher education. It is also how “attracting more people to come to Wales to study and work” stops being an aspiration and becomes a proposition.

And it should be honest about outcomes. Wales should aim for the lowest graduate regret in the UK – and should be willing to publish the data that shows whether it is achieving it.

DELIVERING THE AMBITIONS

Almost all of this sits within Wales's existing devolved powers. As set out above: some of it is rule change, some is reallocation, and some requires new grant spend – and where the loan system itself needs to move, that is exactly the negotiation a formal funding review exists to have. The eight asks belong to the review. What follows is who does the rest.

What the Welsh Government can do without waiting

- Amend the student support regulations to define “full-time” as 90 credits – no primary legislation required
- Establish a Cabinet sub-committee on student experience with cross-departmental KPIs on retention, student poverty, housing affordability and graduate regret
- Commission the minimum income standard research and biennial national wellbeing research now, so the review inherits evidence rather than anecdote
- Make the young persons' transport scheme permanent and universal for students
- Commission the national student employment strategy alongside the Cabinet sub-committee's work – and make the single Welsh case to Westminster on semester-flexible employment rights
- Prepare Wales to be first and fastest into Erasmus+, and settle Taith's complementary future
- Mandate the Diploma Supplement for all Welsh higher education qualifications
- Create the Study in Wales portal

What Medr should do

- Develop a common credit framework enabling transfer between Welsh institutions, and guidance for dual and combined degrees across the university-college boundary
- Require cross-disciplinary credit by right, credit for work-based learning and community engagement, and pass/fail language modules at every institution
- Commission the all-Wales prevalence survey on harassment and sexual violence, and raise safety expectations to England's floor
- Require workload audits so credits mean what they claim

- Require credit recognition for work-based learning to extend to employment students already hold, and issue the Welsh Section 6.1 catalogue for the Diploma Supplement
- Strengthen the Learner Engagement Code at first review – from “should” to “must” – and give students’ unions a formal route into annual assurance
- Use its power to differentiate – sector-specific briefing documents that set HE expectations reflecting students’ status as adults with independent unions, and FE expectations built around structures colleges actually have, rather than lowest-common-denominator convergence
- Require standing learner protection plans with teach-out standards
- Set binding targets for Welsh-medium provision with funding to match
- Monitor graduate retention and graduate regret as system outcomes

What institutions should do

- Partner with students’ unions to design peer support, student tutoring, and flexible pathways – and fund them like the infrastructure they are
- Develop dual degree programmes across the university-college boundary
- Ensure every student can take modules outside their core discipline and in languages
- Shift toward applied and challenge-based learning – presence, not production
- Offer substantial credit-bearing work-based learning with Welsh employers, paid where the work has value
- Adopt good work standards for all student employment on campus, set targets to grow it, and apply the standards to suppliers and partners through procurement
- Conduct housing impact assessments before increasing recruitment
- Pursue Erasmus+ partnerships now, ready for full participation

Cross-government consequences

And these are the things the review cannot deliver but a government that accepts its logic must:

- A national student health strategy – dual GP registration, fast-track disability assessment, NHS coordination

- A national student employment strategy – cross-government, with the reserved-powers case pressed on Westminster
- Rent measures that include students and PBSA by design
- A graduate guarantee behind every bursary-tied public service course
- Welsh-medium staff capacity protected as national infrastructure
- Graduate repayment holidays and partial cancellation for those who contribute and stay – negotiated with the Treasury as part of the settlement

CONCLUSION: Y GORAU OLL

Welsh students are ambitious. The question for Wales is whether it will match that ambition – and for once, the question has a date attached. A review with nothing off the table can entrench the defensive story: managed decline, spreadsheet survival, students as cost lines. Or it can do what Diamond did a decade ago and set the terms the rest of the UK spends years catching up with.

Stripped to its essentials, the choice is threefold. Wales can choose coordination over fragmentation – using the machinery only a small country has, so that health, housing, transport and education pull in the same direction for students. It can choose flexibility over compression – a credit system built for real lives rather than an English model of pace, pressure and throughput. And it can choose partnership over consultation – students with genuine power, unions with funded independence, contribution recognised and rewarded. Cynefin as policy, not just poetry.

Y Gorau Oll means “the very best.” Not just surviving. Not just competing. The best place in the UK to be an ambitious student – a system built for Wales, not just located in it.

Wales can choose to be that. The review is where it chooses.

SUMMARY: EIGHT AMBITIONS FOR WELSH HIGHER EDUCATION

1. Every student will shape their own learning

- a. Credit portability across institutions; dual degrees combining academic and vocational study
- b. Cross-disciplinary credit by right; full-time threshold of 90 credits with a maintenance floor below it
- c. Credit-based tuition liability and PGT funding; workload verification
- d. Applied and challenge-based learning – presence not production
- e. First and fastest on Erasmus+; the Diploma Supplement for all; lowest graduate regret in the UK

2. Every student will contribute to Welsh communities

- a. A civic guarantee – funded contribution opportunities unlocking loan benefits, never gating core entitlements
- b. Subject-level associations for every programme; protected status for student representatives
- c. Guaranteed placements with Welsh employers; a graduate guarantee behind bursary-tied courses
- d. Retention incentives for those who contribute and stay

3. Every student will have what they need to thrive

- a. Diamond's universal-total architecture defended; grant concentrated within it
- b. A Welsh minimum income standard; the wage link restored; thresholds unfrozen
- c. Graduate repayment holidays; cross-government cost reduction; rent measures that include students

4. Every student will be supported to succeed

- a. A finance-information guarantee and a refocused Seren
- b. Mandatory rights training delivered by students' unions; student tutoring at scale

- c. Co-convened student services; credit-bearing first-year development; space to learn from mistakes

5. Every student will be healthy, safe – and help Wales be healthier

- a. National student health strategy; dual GP registration; fast-track disability assessment
- b. An all-Wales prevalence survey and safety regulation raised to England's floor
- c. Biennial national wellbeing research; credit-bearing health contribution; housing quality standards

6. Every student will be able to learn languages

- a. Right to language credit – any language, pass/fail, on the Diploma Supplement
- b. Welsh language modules for all; binding Welsh-medium targets with funding; protected staff capacity

7. Every student will be a partner in their education

- a. The Learner Engagement Code strengthened – comply or explain, consent not just consultation
- b. Sector-specific expectations for HE and FE – not lowest-common-denominator convergence
- c. Joint governance for key services; funded independence for students' unions
- d. Complaints as learning; standing learner protection plans

8. Every student will have good work

- a. The UK's first national student employment strategy – built around the credit system's study-hour assumptions and the developmental 11–20 hour zone
- b. Universities and SUs as exemplar employers – good work standards, more and deeper student jobs, agency spend brought in-house, standards spread through procurement
- c. Timetabling and assessment that accommodate working students; credit and Section 6.1 recognition for the jobs students already hold
- d. Career preparation in the credited degree with subject associations as careers infrastructure; student employment as graduate retention policy
- e. Graduate enterprise backed as growth policy – entrepreneurship credit, incubation, early-stage finance
- f. Plus: Study in Wales

- g. National portal showcasing the distinctive Welsh offer
- h. Transparency on outcomes, including graduate regret

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