Executive Summary of the Nursing and Midwifery Council Canterbury Christ Church University Learning and Improvement review final report

Contents

Background

In January 2020 Canterbury Christ Church University's (CCCU's) midwifery programme was confirmed as a critical concern by our Quality Assurance Board, in line with NMC education quality assurance (EdQA) processes over the 2019-2020 period. Our concerns about the practice learning environment for student midwives related to the well-documented concerns about the safety of maternity services at East Kent Hospitals University NHS Foundation Trust. We worked with CCCU to address concerns around the education of midwifery students. Wider concerns about the university's management of the programme, and partnership working with its practice learning partners, arose during an approval visit for their new midwifery programme against our new midwifery standards in 2022. This ultimately led to our decision to refuse approval of this new programme.

In May 2023 we withdrew approval of CCCU's pre-registration midwifery programme due to concerns about the safety and quality of the programme. The programme was initially approved in March 2017, but we were not assured that it was continuing to meet required NMC standards. We were concerned that the university, in partnership with the NHS trusts that provided practice placements for its students, was not equipping midwifery students with the skills, knowledge and experience to meet our requirements for safe midwifery care. We made this decision in the best interests of women, babies, and families.

Following this decision, and in line with our statutory framework, we worked in collaboration with CCCU and NHSE to devise alternative arrangements to enable the affected students to continue their education. After engagement with several different approved education institutions (AEIs), CCCU transferred second- and third-year students to the University of Surrey's approved midwifery programme (there were no first year students at this point). Our Quality Assurance Board approved the transitional arrangements and a supporting bridging module, and CCCU students resumed their studies in September 2023. We have consistently met with AEI staff from CCCU and the University of Surrey, as well as students, to support the new arrangements, and we have supported CCCU on their improvement journey.

Rationale for commissioning a review

The withdrawal of programme approval for CCCU's pre-registration midwifery programme was the first time the NMC had taken this action. We committed to undertake internal and external lessons learned reviews. The internal review was

completed in March 2024 and these findings fed into the later external review we commissioned.

The external review was led by an independent education consultant. It focused on our processes and communications, from the initial concern through to the final transfer and integration of students to the University of Surrey. It included contributions from internal staff from across the Professional Practice directorate and wider NMC, and external stakeholders and students. The aim of the review was to identify learning from the whole process and make recommendations to be considered as part of the wider NMC EdQA improvement programme. The completed report was received in October 2024.

The following summary focuses on themes identified for improvement. It includes a timeline of events in Annexe 1, and a compilation of all recommendations made, with progress on implementation to date, included as Annexe 2.

Methodology

The methodology adopted aimed to provide a robust and detailed understanding of the events leading to, and subsequent actions and communications related to, the decision to withdraw approval of this midwifery programme – with a focus on continuous improvement and stakeholder engagement. A comprehensive approach was taken, including gathering and analysing data and evidence from a wide range of sources, to understand decision-making, engagement and processes.

Sources included stakeholder documents, previous reports, findings from the internal NMC EdQA review, and interviews conducted with both internal and external stakeholders. Interviewees included NMC staff, CCCU staff and former students, and other external stakeholders involved in the decision-making processes or follow-up activities such as NHS England, Royal College of Midwives, Mott MacDonald (the EdQA outsource provider at the time), Council of Deans of Health and practice leaning partners.

Observations of internal activities, processes and practice across the NMC's Professional Practice directorate were undertaken, including across EdQA, and meetings and workshops were held, including an internal stakeholder 'lessons learned' workshop.

Interviews and meetings were recorded using Teams Transcription, with transcriptions subsequently coded, duplicate comments removed, and themes identified.

Timeline

The report covers the timeline of events leading to the withdrawal of approval, starting from initial concerns in February 2020 to the final decision in May 2023, and through to transfer of students to the University of Surrey. A list of key dates is in Annexe 1, including meetings, student listening events, and actions taken by the NMC and CCCU.

Summary of the report findings and recommendations:

1. Significant **safety concerns** were highlighted, including problematic cultures in practice placement areas, inadequate university responses, and the need for prompt, transparent communication around safety issues to protect students and staff. The need for learners' education and safety to be prioritised in all decision-making processes was emphasised. Safety of the public, including women, babies and families are contingent on safe, effective student learning.

2. **Student support and welfare**: The distress this withdrawal of programme approval caused to students led the report to emphasise prioritising student welfare. This included the NMC and CCCU assuring comprehensive support services, clear communication and proactive plans and measures to safeguard students during such difficult times – from the emerging concern to their transition into an alternative AEI. To mitigate impact on students, the need to collect student data to conduct an **equality impact assessment** prior to the decision to withdraw programme approval was identified.

3. **Quality assurance and monitoring**: The findings emphasised the need for a shift towards proportionate, proactive upstream risk mapping, monitoring and interventions in NMC EdQA, and the involvement and insight of practice partners and academic staff in the QA process. The report also referenced the need for improvement of EdQA processes including: clarity of roles and upskilling of NMC EdQA staff; review and update of guidance, handbooks, tools and processes; and the establishment of clear procedures for withdrawal of approval, programme closure, and any subsequent transition of students.

4. Challenges in **communication and feedback** between all parties – students, regulatory bodies (including the NMC and Office for Students) and other stakeholders (such as NHSE) were noted. Recommendations included clearer processes for gathering, using and following up on intelligence, including student feedback, and sharing of information, particularly anything related to programme concerns and regulatory actions. The report reiterated the need to be more joined up across the system, with formal **collaboration** between AEIs,

regulators, care/practice placement providers and other stakeholder organisations. This will ensure alignment in proactively addressing emerging and actual concerns, with clear protocols for information sharing.

5. **Communication and engagement** with students were two areas highlighted as requiring improvement from both AEI and NMC perspectives at all stages of the escalation process, from raising of a concern to student transition to an alternative AEI. The report recommended that student listening events are conducted in a balanced, supportive manner that assures accurate and diverse perspectives are represented, with clear guidance around how these are conducted to assure engagement with students is safe, effective and kind. The report noted the need to improve internal **communication** between EdQA and the wider NMC, including with its executive board and Council, and external communication between the NMC and AEIs more generally, with clearly identifiable points of contact within EdQA for AEIs. Communications cited as requiring improvement or clarification included updates, information sharing, formal communication protocols from the NMC to AEIs, and proactive, timely reporting of emerging or serious concerns.

6. **Transparency and decision-making**: The findings highlighted that student and public safety are at the heart of decision-making around quality of education, and impartiality and fairness could be reinforced if external representation is included. Transparency and understanding of NMC regulatory processes among students, AEIs and other stakeholders, and transparent, consistent expectations and decision-making processes were called for. This included clear documentation and visual thresholds to improve understanding and trust among stakeholders, and timely escalation of concerns.

7. **Governance and regulation**: The findings cited the need for clarity, transparency and consistency in decision-making of the NMC around withdrawal of programme approval, and more broadly around management of emerging concerns, to foster trust and reduce misunderstanding. The report recommended stronger governance, clearer roles and responsibilities and improved regulatory processes and timelines, including the establishment of independent oversight and structured protocols for effective decision-making within the NMC.
The findings noted the opportunity that regulatory reform may bring, for example to allow 'conditions' to be applied to address critical concerns related to NMC approved programmes, rather than the sole sanction of withdrawal of approval.

8. The findings highlighted concerns related to the **AEI's QA governance and QA activities** and offered recommendations to the AEI to enhance these. These included attention to their mitigation and contingency planning regarding

potential programme closures to minimise impact on students and clarifying their governance roles and that of other stakeholders. The report also recommended enhancing decision making across the AEI's leadership and involving those within AEIs who are experienced in regulatory standards. Recommendations were made related to the AEI's QA governance and processes in terms of learning from this withdrawal of programme approval and its consequences in order to improve. There were also AEI recommendations around prioritising learners' education, wellbeing and safety. This included provision of student support following the withdrawal of programme approval, through their transition to an alternative AEI, and post-transfer, in order to support their progression and wellbeing. The AEI was also encouraged to proactively report exceptions to the NMC.

Overall, the findings provided recommendations for continuous improvement of education quality management at the NMC, in particular within EdQA, as well as recommendations for AEI QA improvement. This included the NMC's QA framework and processes, communication and collaboration, governance and decision-making, and student support – all with the aim of enhancing the overall quality of nurse and midwifery education.

Annexe 1: Timeline of major actions and event in the withdrawal of approval

Date	Event/Issue
Feb 2020	Original concerns arose in relation to placements at East Kent Hospitals University NHS Foundation Trust.
Jun 2022 (report released Aug 2022)	Mott MacDonald approval visit for the new midwifery programme identified significant concerns leading to refusal of the new Programme against new standards.
Aug 2022	HEE Listening Event with students and Practice Learning Partners.
Aug 2022 onwards	Monthly NMC-CCCU meetings (reviewing action/contingency plans)
Dec 2022	NMC Student Listening Event – CCCU provided observations on this report.
Dec 2022 onwards	CCCU submitted exceptional reports and action plans.
Jan 2023	Re-approval deferred
Feb 2023	CCCU paused midwifery placements at WH Hospital. CQC announced enforcement action on WH Hospital Maternity & Midwifery services
22 Feb 2023	NMC QA Board made the initial decision to withdraw approval.
27 Feb 2023	Initial Withdrawal Decision formally communicated to CCCU
Mar 2023	CCCU preparing response
6 Apr 2023	QA Board agreed aspects of CCCU response needed clarifying, therefore extra time given
26 Apr 2023	QA Board reconvened – final decision to withdraw made
2 May 2023	Decision formally communicated to CCCU
May – Sep 23	Ongoing work to transfer of students to University of Surrey

Annexe 2: Report recommendations and progress with their implementation

	Theme	Recommendation	Implementation In progress or completed	Comments
1.	**NMC Quality assurance & continuous improvement**	Prioritise learners' education and safety in all decision-making processes.		This is central to all planning and decision-making within EdQA and is evident throughout the Review of the 2024 Mandatory Exceptional Reports.
2.		Collect student data to conduct an equality impact assessment prior to decisions to withdraw programme approval		The EdQA team carries out an equality impact assessment prior to any decision-making related to high-level concerns where there is potential or actual impact on students.
3.		The NMC must take a more proactive and transparent regulatory approach.		The NMC have invested in the EdQA team to increase the visibility and engagement of Officers at a regional level. The NMC has also engaged with a new Quality Assurance Service Partner (QASP), QAA (from 01 September 2024), to undertake elements of the quality assurance function. To date, this has focused on approval and major

	AEI			modification processes to ensure AEI programmes are contemporary and continue to meet our standards. Our next steps are to support the QAA to develop, refine and publish their approach to undertaking monitoring visits and extraordinary reviews. It is anticipated this will be in place by **31 August 2025**.
4.		Focus on continuous improvement and learning from past experiences.		A continuous improvement approach is now embedded within the EdQA team, with evaluation and learning now planned at the start of all new initiatives or processes. The team have also completed a listen and learn exercise following monitoring visits undertaken in the years 2022-2024.
5.		Incorporation of lessons learned from the impact of COVID-19 on nursing and midwifery education for future planning.		The mandatory exceptional report (2024) addressed areas of confusion related to misinterpretation, application or failure to withdraw emergency and recovery standards. The NMC education team also published an evaluation of increased use of simulated practice learning, some of which evolved during the pandemic in 2024.

				Lessons learned related to nursing and midwifery education during the pandemic are contributing to the current practice learning review.
6.		Ensure a balanced expertise mix within EdQA for effective regulation.		The EdQA team has increased in size and skills mix, particularly focusing on increasing the number of registered nurses and/or midwives within the team who have a background in higher education and academic programme quality management.
7.		Regularly review/update QA handbooks and documentation, including new processes and tools, for better understanding and reference.		With the change in QASP, the EdQA team have taken the opportunity to review all processes and tools. These are now being written into revised handbooks with clear flowcharts. We have completed this for approval of new AEIs and programmes and programme modifications. The NMC has a clear process for the management of critical concerns, however, this programme of work is not yet completed as we're awaiting the QAA's processes for undertaking monitoring visits and extraordinary reviews. This is due for completion by **31 August 2025**.
8.		Provision of process maps and detailed procedural policies that AEIs and other stakeholders can access to aid understanding.		

| 9. | | The NMC should establish clear procedures for withdrawal of approval / programme closure to ensure structured involvement and support during challenging times. | | We aim to complete this recommendation by **June 2025**. The EdQA team focus has been on working proactively and earlier with AEIs to resolve issues so that they do not escalate to this stage. We've employed (on fixed term contracts) two colleagues with significant experience in EdQA to act as specialist support for AEIs in critical concerns, to strengthen the resource available to prevent the circumstances that would require withdrawal of programme approval. This has proven highly effective in enabling AEIs to take appropriate restorative action and resulted in rapid improvements and the closure of concerns. |
| 10. | | Development of clear processes for student transition to another AEI following withdrawal. | | There is an Office for Students requirement (England) that a student protection plan must be in place that sets out what students can expect should a programme, campus or institution close. This includes loss of regulatory or professional body approval of a programme. This plan is to ensure students can continue and complete their |

				studies or be compensated if this is not possible. As per Article 18 (8)[1] (see footnote) the NMC facilitated student transition to an alternative provider (University of Surrey) having been granted an exception to usual RPL rules which entailed recognition of all academic credit and practice hours, with detailed mapping to ensure all learning outcomes and Standards of proficiency would be met when their programme completed.
11.		Provide support and guidance to universities facing challenges and implement processes for resolution of concerns.		The EdQA team is receiving excellent feedback regarding the support and guidance we are providing to AEIs who face challenges. We now coproduce exit plans for all AEIs in critical concerns, to make clear our expectations and key dates, such as QA Board meetings, to ensure progress through a critical concern is timely and transparent. We also ensure

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[1] " *Where approval is withdrawn under this article, the Council shall use its best endeavours to secure that any person who is undertaking the education or training concerned or is studying for the qualification concerned or is studying at the institution concerned at the time when recognition is withdrawn is given the opportunity to follow approved education or training or to study for an approved qualification or at an approved institution".*

				there is a named contact person from the EdQA team to provide real time feedback and support the AEI in achieving the outcomes of the action plan. Our next steps are to publish a series of EdQA policy statements, in response to requests for clarity on specific areas of our Standards (reflective practice, simulated practice and breaks) by **Sept 2025**.
12.		More emphasis on triangulating data from placement providers and universities.		Training delivered to new QA Visitors from the QAA ensures this fundamental tenant of EdQA is consistently understood and embedded.
13.		Cross-reference NMC standards with institutional standards.		All approval processes, including AEI status approval, considers how the institution's own regulations and standards align with the NMC standards and requirements. Approval of all programmes is conjointly assessed and considered between the education institution and independent QA visitors, on behalf of the NMC. The NMC standards are outcome focused and constructively aligned to institutional standards. This allows for the

				independence of AEIs to set and maintain their own regulations, within the scope of the UK higher education sector.
14.		Continuously listen to feedback and work towards positive change / continuous improvement		The EdQA team is committed to listening to feedback from stakeholders and have an improvement plan in place.
15.	**NMC Education Quality Assurance (EdQA)**	Include other professionals in QA planning, processes and decision-making: • clinical experts for professional input related to practice context • an academic who understands AEI operations, processes and regulations		The QA Board membership represents a diverse skills and experience mix to provide oversight of EdQA operations and decision making. The EdQA team is in the process of establishing a Reference Group, which will comprise external stakeholders to provide contemporary challenge and externality to inform decision making. **May 2025**
16.		EdQA staff: Establish clear roles and responsibilities for quality assurance staff. Strengthen the skill set of individuals involved in quality assurance to ensure effective oversight.		The EdQA team has grown in capacity and capability, having effectively strengthened the team's knowledge and experience through targeted recruitment and the establishment of clear roles and responsibilities for all team members. However, the team lacks stability as 50% of the current roles are interim, fixed term

				or seconded positions; this includes all leadership roles within the team. A new structure with additional posts, stabilisation of temporary roles and an improvement plan are all detailed in a business case that is pending approval.
17.		Offer training and guidance to universities on new QA processes to alleviate concerns and ensure smooth implementation.		In January 2025, we provided a training video on how to complete the annual self-report and supplemented this with two online drop-in support sessions. The sessions were well attended, with around two thirds of the AEIs engaging with us. During these sessions, we asked for feedback on other training we can provide. Subsequently, we've planned a series of online workshops which we will launch and announce at our first EdQA Conference for AEIs – being held in Birmingham and Edinburgh during May 2025.
18.		Establish direct contacts between AEI teams and the NMC / EdQA. Include a nominated (NMC) case officer for clear communication.		The NMC has invested in doubling the number of EdQA Officers within the team to enable a regional approach to relationship management.

				Where AEIs are on enhanced scrutiny or critical concerns pathways there is always a named person to lead support and communication with the NMC.
19.		Enhance EdQA / NMC understanding of university operations and programme quality to support and inform decisions and provide better support to stakeholders.		The EdQA team has increased in size and skills mix, and all members of the (interim) leadership team have a strong background in higher education and academic programme management. The QA Board has diverse representation from across the organisation, with a strong focus on education.
20.		Request for a risk-based report template to track progress of concerns.		The EdQA team uses a risk-assessment process to review new concerns and map these to the NMC standards. This then becomes the progress tracker and a tool for communication between the QA Board and the AEI.
21.	*Monitoring*	Enhance monitoring / more regular external monitoring for programme quality assurance.		To safely achieve this, we undertook the 2024 mandatory exceptional reporting exercise which considered specific risks at all AEIs providing preregistration programmes. This allowed us to pause routine monitoring visits while the QAA

				developed the necessary expertise and processes associated with undertaking monitoring visits. This is due for completion by 31 August 2025. During this time, all risk-based extraordinary review activity, enhanced scrutiny processes and new programme monitoring has continued.
22.		Need for a positive and supportive monitoring experience.		The EdQA team has completed a listen and learn exercise following monitoring visits undertaken in the years 2022-2024 to consider and plan for enhancement of future monitoring activity. This learning has been shared with QAA to support development of their approach to undertaking monitoring visits and extraordinary reviews, which is anticipated will be in place by **31 August 2025**
23.	*Decision-making*	Ensure independence in EdQA decision-making to avoid conflicts of interest and ensure fair transitions for students including: a. Involve all stakeholders in decision-making processes.		Broad stakeholder perspectives are gathered, presented and are influential at all decision-making meetings of the QA Board. Any potential conflicts of interest at the QA Board are recorded and declared and

		b. Have a representative from the QA service partner present at decision-making meetings for better understanding and support. c. Organisations like the RCM should be involved in discussions and decision-making processes to provide support, advocacy, and expertise in situations involving midwifery programme closures and transitions for students and lecturers.		individuals may abstain from the decision-making process accordingly. (Stakeholders include AEIs, students, practice partners, NHSE and equivalent bodies in devolved nations, unions and professional bodies and others involved in the education and training of nurses, midwives and nursing associates).
24.	**Communication, Collaboration & Stakeholder engagement:**	Ensure clear communication and feedback mechanisms between regulatory bodies and universities / AEIs including structured meetings, detailed procedural policies and protocols, and face-to-face interactions.		The EdQA team has established a new webpage where all AEI letters, reports and webinar videos are shared in an open and transparent way. Where issues or concerns are identified the regional officers always offer online meeting support, or a face-to-face visit with appropriate members of the team to address the issue/concern.
25.		Strengthen communication and foster collaboration between the NMC, other regulators and relevant stakeholders to enable: a. timely sharing of concerns b. a system for early information sharing to facilitate collaboration		The NMC EdQA team collaborates with other regulators and a wide range of stakeholders across the UK to share learning, address concerns and reduce duplication and regulatory burden. This is demonstrated through the Inter-Regulator Group and by use of the CQC Regulatory

		c. smoother transition and support for students impacted by withdrawal of approval.		Concerns Protocol for education-identified concerns.
26.		Establish a formal, clear and standardised communication route for early notification of serious issues, conveying severity.		The EdQA team has a process for the engagement and notification of AEIs, practice learning partners and key stakeholders as relevant to the identified concern. Including notification at a senior level within the AEI and use of the CQC Regulatory Concerns Protocol for education-identified concerns, as appropriate.
27.		The NMC needs to be more proactive in support of safeguarding of students / staff affected by EdQA processes		Prioritising support and safeguarding are central to all planning and decision-making within EdQA and is evident throughout the Review of the 2024 Mandatory Exceptional Reports. The EDQA are also exploring the use of 'Careline' as a support mechanism for students or staff distressed by EdQA processes. **The date for this is TBC**
28.		Ensure clear communication and transparency about new processes to avoid misunderstandings and anxiety.		All new EdQA processes are launched jointly with the QAA and we share

				webinars via our respective websites for transparency and reference.
29.		Improve transparency and understanding of regulatory processes among students to alleviate concerns and promote a better student experience.		The NMC has produced a series of student focused communications and supporting social media content to assist in student understanding of our regulatory remit and influence on the student journey. The EdQA team undertake presentations to student groups and forums upon request.
30.		Establish clear processes for gathering and using feedback from students and stakeholders.		Feedback from stakeholders including students, people who use services and their carer representatives, academic staff and practice learning partners is gathered during all our core processes: approval, new programme monitoring, programme modifications, enhanced scrutiny, monitoring visits and extraordinary reviews.
31.		Make use of evidence like NSS data and student feedback, including from student engagement.		The EdQA team make use of a wide variety of data sources to identify and understand issues and concerns, including the NSS, and the NHSE

				National Education and Training Survey (NETS).
32.		Instigate a more collaborative approach for sharing feedback across institutions.		Each year, we run webinars to share good practice and learning from our findings of the annual self-report. In December 2024, we published the Review of the 2024 Mandatory Exceptional Reports. The NMC meets regularly with AEIs via regional and national practice learning groups (PLGs) to collaborate, share practice and collect intelligence from the sector to support continual improvement. We collaborate with other regulators and professional bodies to promote 'joined up' regulation. We attend a UK wide Simulated practice learning group to share feedback and learning to support good practice and compliance with standards.
33.		Consider a buddy system for institutions to support each other in quality assurance.		When AEIs are making good progress or coming to the close of a critical concern, we have sought the consent of the official correspondent to share their contact details with an AEI who are at an earlier

				stage of the process. This is voluntary and does not involve the NMC beyond a mutually agreed introduction.
34.	**Student support and wellbeing**	Review conduct of student listening events to assure a balanced approach and ensure clear and transparent communication with students during and after these events.		We have taken a proactive approach to changing how we engage with students prior to involving them in EdQA activity, now using a multi-modal approach. We've heard feedback from AEIs regarding student listening events, which includes their wish to provide a voice for AEI staff and evidence as part of the event. This would change a student listening event into a focused monitoring visit, therefore there is a need for greater consideration and collaboration with stakeholders before a new model is developed and published. We will work with our new QASP to develop a new approach to student listening events, utilising and building upon the QAA's experience of using student visitors as part of the QA process. We will aim to complete this work by **December 2025**.

35.		Provide training for effective feedback and mediation management to those involved in student listening events.		Training for effective feedback and mediation for those conducting student listening events will be included in the review of our approach to these events as detailed in point 34.
36.		Need for diverse methods of gathering student information, for example, introduction of new processes like Microsoft Forms for student engagement.		The EdQA team use technology-enabled methods to allow students to sign up anonymously to our focus groups, within monitoring activities (including student listening events). However, we also consider the AEI's own evaluations and student experience feedback surveys as part of all our processes to prevent duplication for students.
37.		Ensure **with the AEI** that there is provision for aftercare for students to support their wellbeing during / after student listening events.		Student wellbeing and safety is central to the collaborative planning for EdQA processes with the AEI. This includes ensuring on-site, dedicated student wellbeing support services are always arranged prior to any EdQA processes taking place. All QA Visitors are provided with details regarding how to signpost to this support as part of their briefing.

	EdQA			NMC staff attend and observe all EdQA processes and take appropriate action to safeguard those involved, in the event of a risk to safety.
38.		Ensure and prioritise **with the AEI** academic AND wellbeing and mental health support for students to help with the challenges and trauma resulting from educational disruption, and undergoing transition to a new AEI.		In the event of withdrawal of approval, the NMC would work collaboratively and proactively between the two AEIs to ensure student wellbeing and support is prioritised. The EdQA team has strengthened its internal working relationships with the NMC's safeguarding team and would draw upon the specialist knowledge and expertise within this team to keep people safe and act in a trauma-informed way.
39.		Work **with the AEI to ensure** that students are fully aware of processes for their transition to an alternative programme / AEI.		In the event of withdrawal of approval, the NMC would work collaboratively and proactively with the two AEIs to support student transition to an alternative programme/AEI.
40.	**NMC governance, regulation and decision-making**	Establish clear lines of escalation, including responsibilities of all stakeholders in raising and addressing concerns, and withdrawal of programme approval.		Clear lines of escalation are in place regarding the identification of concerns, the classification of the most serious concerns by the QA Board and the

					operation of the critical concerns and enhanced scrutiny processes. We have not completed the work to clearly define processes for withdrawal of a programme. We have not yet published our concerns and monitoring guidance for AEIs and are collaborating with our QASP to produce the externally facing guidance for AEIs regarding this. This will be completed by the **31 August 2025.**
41.		Consider setting up external panels for decision-making, to ensure impartiality.		Considered	The QA Board is responsible for decision-making regarding education on behalf of the NMC as a Regulator. The EdQA team is establishing a stakeholder reference group that will provide independent advice and guidance. **May 2025.**
42.		Consider regulatory reforms to allow for conditions, rather than just the ultimate sanction of programme withdrawal.		Considered	The EdQA team has engaged in NMC preparations for Regulatory Reform, including using simulated scenarios for the 'road testing' of possible new powers that could come as a result of regulatory reform, such as the ability to give formal warnings and set conditions.

43.		Conduct a round table event involving key stakeholders, including the AEI, to review what could have been done differently.		The EdQA team worked with an external consultant to conduct this as a series of stakeholder engagements, rather than a round-table event. This methodology was designed to be person-centred and enable participants to speak candidly about their experiences and perspectives. We are grateful to the participants for their time and sharing this with us to promote learning and improvement.
44.	**Key learning / recommendations for AEIs:**	Universities should have experienced individuals in strategic roles to navigate QA and regulatory standards effectively, including experienced academic staff in key leadership roles to navigate complex educational transitions effectively.		**These recommendations relate to the AEI / AEIs. We are sharing them with AEIs to inform their leadership and management of NMC programmes, reinforce our processes, support students on NMC programmes and so that we can continue developing our collaborative partnership.**
45.		Establish and ensure that regulatory processes are clear in student programme handbooks.		
46.		Universities should have robust mitigation plans in place for potential actions, and contingency plans in place for withdrawal of programme approvals to handle such situations more effectively in the future.		

47.		Ensure efficient operations and decision-making processes to address challenges promptly and effectively.		
48.		Streamline processes for data transfer and credit importation to facilitate smooth transitions for students.		
49.		Emphasise the importance of midwifery leadership within universities.		
50.		Collaboration between the AEI's EdQA, programme leads and other external stakeholders when regulatory concerns are raised to ensure timely support for learners, and development / execution of effective mitigation plans.		