

## **EXPLANATORY MEMORANDUM TO THE ASSEMBLY LEARNING GRANTS AND LOANS (HIGHER EDUCATION) (WALES) (No.2) REGULATIONS 2011**

The Explanatory Memorandum has been prepared by the Engagement and Student Finance Division of the Department for Children, Education, Lifelong Learning and Skills and is laid before the National Assembly for Wales under Standing Order 24.1.

### **Minister's Declaration**

In my view this Explanatory Memorandum gives a fair and reasonable view of the expected impact of the Assembly Learning Grants and Loans (Higher Education) (Wales) Regulations 2011. I am satisfied that the benefits outweigh any costs.

*Leighton Andrews*

Minister for Children, Education and Lifelong Learning

21 March 2011

### **Description**

1. These Regulations are required in order to underpin the higher education student support system in Wales (fee grants, fee loans, maintenance grants and maintenance loans) in relation to full-time students, part-time students, distance learning students and certain postgraduate students for academic year 2012/13. These regulations amend and will eventually replace the existing *Assembly Learning Grants and Loans (Higher Education) (Wales) Regulations 2011 No.148 (W.32)*. The main student support regulations are made on an annual basis.

### **Matters of special interest to the Constitutional Affairs Committee**

2. A single regulatory impact assessment has been undertaken in relation to the full suite of legislation being brought forward to implement the Assembly Government's policy on higher education funding and student finance for academic year 2012/13.

### **Legislative Background**

3. In June 2006, section 44 of the Higher Education Act 2004 transferred to the National Assembly for Wales the majority of the Secretary of State's functions in relation to student support (essentially the Secretary of State's functions under sections 22 and 23 of the Teaching and Higher Education Act 1998 ("the 1998 Act")). Sections 47 and 52 of the 2004 Act gave the

National Assembly for Wales power, by order, to bring section 44 into force. The relevant Order bringing into force the various subsections of section 44 is the Higher Education Act 2004 (Commencement Order No. 2 and Transitional Provision) (Wales) Order 2005 as amended by the Higher Education Act 2004 (Commencement Order No. 2 and Transitional Provision) (Wales) (Amendment) Order 2006. Those National Assembly functions under sections 22 and 23 of the 1998 Act are now vested in the Welsh Ministers by virtue of Schedule 11 of the Government of Wales Act 2006. Each year, the relevant functions of the Welsh Ministers in regulations made under section 22 of the 1998 Act are transferred and delegated to Welsh local authorities and the Student Loans Company under section 23 of the 1998 Act.

4. This instrument follows the Negative Resolution procedure.

#### **Purpose and intended effect of the legislation**

5. The Welsh Ministers make annual regulations governing the higher education student support system. Generally, each set of regulations relates to a particular academic year. These Regulations will amend and eventually replace the existing legislation governing academic year 2011/12 and the student support arrangements for students ordinarily resident in Wales and EU students attending Welsh higher education institutions who are undertaking designated higher education courses. These regulations will govern the 2012/13 academic year and will enable Welsh Ministers to make awards of grants and loans to eligible students. In amending and replacing the existing legislation, these Regulations will introduce a number of policy changes together with some technical drafting amendments.
6. The specific policy changes incorporated within the regulations are set out below:

- a. **Full-time students**

In academic year 2012/13, there will broadly be four different packages of support available to full-time students who are ordinarily resident in Wales, depending upon when the students started their course:

- (i) *The package of support for full-time students who start their courses in academic year 2012/13*
      - The tuition fee loan has a maximum value of £3,465 (an inflationary uplift of 2.7%) (ensures that no full-time undergraduate has to pay fees 'up-front');
      - A "new fee grant" of up to £5535 is available to top up the loan, depending on the tuition fee charged for the course, up to a maximum of £9,000. This is available for students ordinarily resident in Wales, regardless of where in the UK they study.

- A maximum means-tested maintenance grant of £5,000 is available. The household income threshold for a partial maintenance grant remains at £50,020.
  - A maximum means-tested loan of £6,648 is available.
- (ii) *The package of support for full-time students who started or are treated as starting their courses in academic year 2011/12 and are continuing their studies in 2012/13*
- No existing “fee grant” available (see (iv));
  - The tuition fee loan has a maximum value of £3,465 (ensures that no full-time undergraduate has to pay fees ‘up-front’);
  - A maximum means-tested maintenance grant of £5,600 is available. As for 2010/11 cohort students, the household income threshold for a partial maintenance grant is £50,020.
  - A maximum means-tested loan of £6,648 is available.
- (iii) *The package of support for full-time students who started or are treated as starting their courses in academic year 2010/11 and are continuing their studies in 2012/13*
- No existing “fee grant” available (see (iv));
  - The tuition fee loan has been up-rated in line with inflation to a maximum value of £3,465 (ensures that no full-time undergraduate has to pay fees ‘up-front’);
  - No inflationary up-rating for maintenance grant, maintenance loan or targeted grants such as childcare grant (subject to the point below, a maximum means-tested maintenance grant of £5,000 and a maximum means-tested loan of £6,648 is available). The household income threshold for a partial maintenance grant remains at £50,020;
- (iv) *The package of support for full-time students who started or are treated as starting their courses on or after 1 September 2006 but before 1 September 2010 and are continuing their studies in 2012/13*
- Welsh students studying in Wales may receive the existing “fee grant” which for 2012/13 has been up-rated in line with inflation (2.7%) to a maximum value of £2,030;
  - The tuition fee loan has been up-rated in line with inflation to a maximum value of £3,465 (ensures that no full-time undergraduate student has to pay fees ‘up-front’);
  - No inflationary up-rating for maintenance grant, maintenance loan or targeted grants such as childcare grant (subject to the point below, a maximum means-tested

maintenance grant of £2,906 and a maximum means-tested maintenance loan of £6,648 is available);

#### **b. Part time students**

As regards continuing part-time students and distance learning students, the fee grant available to such students in academic year 2011/12 has been up-rated by 2.7%. The amounts and income thresholds for part-time targeted grants are frozen in line with the full-time student support package.

No provision for part time students commencing their studies in AY 12/13 has been made in these Regulations. It is intended that an amending regulation containing these provisions will be made later in 2011.

#### **c. Amendments to the Assembly Learning Grants and Loans (Higher Education) (Wales) Regulations 2011 (SI 2011 No.148(W.32)) governing academic year 2011/12**

Some minor technical amendments are made to the Assembly Learning Grants and Loans (Higher Education) (Wales) Regulations 2011. These are outlined in Part 14 of the Regulations.

#### **Implementation**

7. This legislation updates the current student support system for academic year 2012/13 and by putting it in place before the end of April 2011 it will enable the delivery partners (the Student Loans Company and the Local Authorities in Wales) to implement the system changes in time for the application cycle for academic year 2012/13 to commence.

#### **Consultation**

8. There is no statutory requirement to consult on these Regulations. However details of the consultation undertaken relating to the changes to student finance as a whole, of which these regulations form a part, are included in the Regulatory Impact Assessment below.

#### **Post Implementation Review**

9. The main regulations governing the student support system are made annually and are continually subject to detailed review, both by policy officials and by the delivery partners in their practical implementation of the Regulations.

#### **Summary**

10. The making of these Regulations is necessary to establish the basis for, and update aspects of, the higher education student support system for

Welsh domiciled students and EU students studying in Wales for the 2012/13 academic year.

## REGULATORY IMPACT ASSESSMENT

### Options Appraisal

**Option 1 – do nothing.** To do nothing in response to the changes announced in England in respect of higher education tuition fees and student finance would have important negative consequences for students ordinarily resident in Wales, the Welsh Assembly Government's budget and HEIs in Wales. For students who choose to study at an institution in England the consequences would be significantly increased levels of student debt as a result of taking out higher tuition fee loans. Welsh students wishing to undertake certain courses currently unavailable in Wales would be obliged to enter into higher levels of debt in order to access those learning opportunities. The cost to the Assembly Government's budget of making available higher fee loans to students ordinarily resident in Wales would be an additional **£12million** (based on an average tuition fee level of £7,000p.a in England) in 2012-13 rising to around **£70million** per year in 2015-16; the majority of that extra cost would be invested in English universities. Under the voluntary arrangement currently in place in Wales, HEIs would be limited to charging significantly lower fees relative to those in England, bringing the risk that a university education in Wales would be regarded as a cheap (and possibly lower quality) alternative. Higher numbers of well-qualified students from outside Wales might be expected to apply for places at Welsh HEIs, thereby limiting the number of places available to students ordinarily resident in Wales. Young people from disadvantaged backgrounds might be deterred from entering higher education, particularly in relation to HEIs in England, by higher fee and debt levels.

**Option 2 – mirror the policy for England.** Adopting the same policy as England would mean very significant reductions in public funding for higher education in Wales (potentially a reduction of up to 80% in the HEFCW's teaching grant to Welsh universities), effectively moving responsibility for funding higher education from the state to the individual. HEIs in Wales would have the freedom to charge tuition fees at levels comparable to those in England. Students ordinarily resident in Wales would be obliged to take out substantially higher tuition fee loans in order to access higher education in Wales or elsewhere, thereby incurring additional student debt. Young people from disadvantaged backgrounds might be deterred from entering higher education, particularly in relation to HEIs in England, by higher fee and debt levels.

**Option 3 – the Assembly Government's solution.** The option being proposed allows institutions in Wales to charge higher tuition fees while providing additional fee support to students ordinarily resident in Wales to protect them against increased levels of debt and guard against any disincentive to access higher education. Under this option, income to the higher education sector in Wales will be at least the same in real terms in 2016/17 as it will be in 2012/13. Students ordinarily resident in Wales will continue to be eligible for subsidised loans to meet the cost of tuition fees up to the current level. However, the Assembly Government will provide a non-

means-tested tuition fee grant for the balance over and above the current fee level. This means that students ordinarily resident in Wales who go to university in 2012/13 will be paying the same in real terms as students who go to university in this academic year. Students ordinarily resident in Wales will not face higher levels of debt in order to access higher education. There would be no perverse incentive for students from elsewhere in the UK to seek places at Welsh HEIs as a “cheap” alternative. There would be no additional disincentive or barrier to higher education for young people from disadvantaged backgrounds in Wales.

### **Costs and benefits**

The changes to higher education funding and student support introduced by this suite of legislation will be phased over 3-4 academic years, with HEIs, HEFCW and students receiving cohort protection in line with the level of support that was provided to students at the start of their studies.

### **Students**

All three options identified above would impact on students.

#### Option 1

### **Existing Students**

For students who decided to study in Wales, there will be no financial impact if they started their course on or before the 1 September 2012 as they would continue to receive the support package that was available in 2011. Under the voluntary arrangement currently in place, their tuition fee would be limited to £3,465 per year.

### **New students**

Given that we could expect there to be an influx of students from other parts of the UK in view of the lower fees in Wales under this option, it is likely that there would be extra competition for places at Welsh HEIs in the initial years. This could reduce the opportunities available to students ordinarily resident in Wales (and particularly those from disadvantaged backgrounds) to study at Welsh HEIs.

However, students ordinarily resident in Wales who choose to study in England, for example, would have to pay an increased tuition fee (up to £5,535 over and above the current fee). This would be paid either by increasing their student loan or paying the tuition fees up front.

## Option 2

### **Existing students**

There would be no financial impact for students who start their courses on or before the 1 September 2012 as they would continue to receive the support package that was previously available in 2011. Their tuition fee would be limited to £3,465 regardless of where they are ordinarily resident.

### **New students**

New students ordinarily resident in Wales would be required to pay an increased tuition fee (up to £5,535 over and above the current fee) whether they chose to study in Wales or elsewhere in the UK. The increased fee would be paid either by increasing their student loan or paying the tuition fees up front.

There would be no differential in fee levels between England and Wales; hence no greater incentive for students from outside Wales to access higher education courses at Welsh HEIs. The prospect of significantly increased fees and higher student borrowing to pay them might deter some young people ordinarily resident in Wales from accessing higher education (particularly those from disadvantaged or non-traditional backgrounds).

## Option 3

### **Existing students**

There will be no financial impact for students who start their courses on or before the 1 September 2012 as they will continue to receive the support package that was previously available in 2011. Their tuition fee will be limited to £3,465 regardless of where they are ordinarily resident.

### **New students**

Students who start their studies from 1 September 2012 will be liable for a tuition fee of up to £9,000 per annum. Students who are ordinarily resident in Wales (or from the EU studying in Wales) will be eligible for a loan (from the Welsh Ministers) to cover the first £3,465, and a grant to cover the remaining fee.

Students who are ordinarily resident in other parts of the UK but choose to study in Wales will be eligible for a tuition fee loan (from the Secretary of State in England, Student Awards Agency Scotland in Scotland or the Local Education Library Board in Northern Ireland) to cover the up-front costs of the fee.

## **HEFCW**

### Option 1

There would be no additional implications for HEFCW as the student support system would continue to operate in its format.

### Option 2

There would be no additional implications for HEFCW as the student support system would continue to operate in its format in Wales

### Option 3

This suite of legislation will extend HEFCW's responsibility to include student finance and place the approval of fee plans on a statutory footing.

Whilst most of the functions are already undertaken by HEFCW in respect of existing arrangements for approving fee plans, regulating this process will necessitate some additional costs to HEFCW, including the provision of reports and information to Welsh Ministers.

The provision of student finance and the subsequent changes to the funding of the HE sector in Wales, will also necessitate initial additional expenditure, either to develop a financial system to enable payment of tuition fee grant to higher education institutions throughout the UK, or to procure the services of the Student Loans Company to administrate the system on HEFCW's behalf.

In addition an independent panel will need to be appointed to review initial fee plan decisions in the event of an appeal against HEFCW's decisions.

The additional costs of operating this system will be met from within existing resources - either from HEFCW's current budget or from WAG accounts.

### Student Finance

The cost of providing the additional fee support (which will be paid direct to HEIs on behalf of each student) to students ordinarily resident in Wales in 2012/13 will be funded by a transfer of resources from the HEFCW teaching grant. This will amount to £31.5m in the financial year 2012-2013.

## **HE Sector in Wales**

### Option 1

The HE sector in Wales would be at a financial disadvantage when compared to the sector in England as institutes in Wales would be unable to raise extra fee income through increased tuition fees. Whilst a significant amount of public subsidy (from WAG) would be available to partially offset the income stream, it is unlikely (depending on the level of fees) to be sufficient to cover

the potential additional income that the HE sector in England would be able to access.

### Option 2

Implementation of Part 3 of the Higher Education Act 2004, introduces significant new statutory functions and procedures to the HE Sector. However, under the voluntary system that is already in place in Wales, most or all of the functions and procedures are already being performed so there are no significant additional costs.

However, the regulations will introduce some potential costs associated with non compliance and / or those issues arising from fee plans not being approved by HEFCW.

Conversely the HE sector in Wales will benefit from the following additional fee income in the financial year 2012-2013.

HEFCW paying for students ordinarily resident in Wales (and EU) – £22.6m  
Students ordinarily resident in other parts of the UK - £14.5m

Whilst the HE sector would be able to charge a higher tuition fee, there would be at least an 80% cut in the amount of public subsidy that would be available from WAG – total £222m during the Assembly Government budgeting period.

### Option 3

Implementation of Part 3 of the Higher Education Act 2004, introduces significant new statutory functions and procedures to the HE Sector. However, under the voluntary system that is already in place in Wales, most or all of the functions and procedures are already being performed so there are no significant additional costs.

However, the regulations will introduce some potential costs associated with non compliance and / or those issues arising from fee plans not being approved by HEFCW.

Conversely the HE sector in Wales will benefit from the following additional fee income in the financial year 2012-2013.

HEFCW paying for students ordinarily resident in Wales (and EU) – £22.6m  
Students ordinarily resident in other parts of the UK - £14.5m

There will be less WAG subsidy to be distributed to the sector in Wales – total £31.5m in FY 2012-2013

## **The economic benefits of high level skills**

### Economic and social benefits

Economic evidence has found a significant role for high level skills in economic development. In Wales research has shown that part of the productivity gap between Wales and the faster growing regions of the UK can be explained by Wales having a lower proportion of the population with high level skills<sup>1</sup>. The same research found that an increase in the proportion of the Welsh population with degree level qualifications and above would significantly improve the productivity of businesses in Wales, a key ingredient for economic growth.

There is also a sizeable literature focusing on the wider spill over benefits arising from increases in high level skills. Workers do not in general work autonomously, but in teams, so that the productivity of an individual worker may be related to the level of education of co-workers. Lower skilled workers may well benefit from working within a team with higher skilled colleagues thus generating additional positive benefits to the business as a whole. The OECD (1998) also identified more indirect wider spill over benefits arising from increases in skills across the economy. This can lead to better public health and parenting, lower crime, an improved environment and greater social cohesion, amongst other things. These improvements themselves can feed back into higher rates of economic growth.<sup>2</sup>

### Benefits from HE to the individual

This section summarises the evidence on the returns from higher education and participation into higher education in Wales. Understanding these trends in participation will help in estimating the potential impact from any reform, especially on individuals from lower income groups.

When making the decision to invest in higher education, individuals typically look at the potential benefits they will accrue against the cost of obtaining a degree. The economic returns (in the form of higher wages) from higher education are found to be positive and have increased during a time where the supply of graduates has also increased. This implies that the demand for graduates has increased to more than match the increase in supply.

The evidence of an increase in graduate over-provision is weak or absent, once allowance is made for the fact that graduates may do better in some jobs for which a degree is not a formal qualification, and some may want to work in lower level employment, e.g. for family reasons. The evidence suggests that any growth in over qualification amongst graduates has mainly been in the form of graduates reporting that there are in below-graduate level jobs but

---

<sup>1</sup> Boddy, M and Hudson, J (2006), Understanding productivity variations between Wales and the rest of the UK - Report to the Economic Research Advisory Panel, Welsh Assembly Government

<sup>2</sup> Sloane, P et al (2003), Returns to Education: A Survey of Findings - Report to the Economic Research Advisory Panel, Welsh Assembly Government

nevertheless do not report that they are underutilising their skills. By contrast, there has been little or no growth in the proportion of graduates who report that they are both overqualified and underutilising their skills.

Compared to individuals that have 2 or more A-levels (i.e. those that had sufficient grades to enter higher education) the returns from higher education are found to be positive and large for women for all degree subjects<sup>3</sup>. Those returns range from between 15% and 21% depending on the level of award.<sup>4</sup>

For men, the returns from a degree are found to vary by main degree subject completed. The largest returns are found for students that completed LEM subjects. Those returns on average are found to be between 23% and 28% higher than for males with 2 or more A-levels as their highest qualification. While there are positive returns from studying STEM subjects those are far smaller on average than LEM subjects. On average the returns from STEM subjects ranges from between 5% and 7% higher than for males with 2 or more A-levels as their highest qualification. Small negative returns are found for males completing OSSAH subjects. For males completing combined degree subjects the returns are found to range between 8% and 9%.

For both men and women degree class has large positive effects in all subjects suggesting the possibility of large returns to effort.

Part of the reason for this high rate of return is that individuals with degree level qualifications and above are much more likely to be in employment. In addition, evidence following the recent recession has shown that the employment rates for individuals with degree level qualifications and above only fell slightly compared to much larger falls for those with lower level skills. This shows that even during a very steep economic decline the demand for workers with degree level qualifications remains relatively strong. Indeed, there is a wide literature showing that the demand for workers has shifted much towards those with high level skills while the demand for workers without any formal skills has fallen<sup>5</sup>.

### Impact of tuition fees

In Wales the introduction of tuition fees appears not to have substantially depressed the overall demand for higher education. This is true in England also. Prior to the introduction of tuition fees many feared that they would result in fewer students from poorer families entering higher education. In Wales there was little evidence that full time and degree level higher education

---

<sup>3</sup> The research undertaken on the returns by degree subject groups subjects into three main categories: Law Economic and Management (LAW); Science Technology, Engineering and Medicine and also includes mathematics (STEM); Other Social Sciences, Arts and Humanities and also includes Languages (OSSAH) and degrees that combine more than one subject.

<sup>4</sup> Walker, I and Zhu, Y (2010) Differences by Degree: Evidence of the Net Financial Rates of Return to Undergraduate Study for England and Wales. Lancaster University Management School Working Paper 2010/038.

<sup>5</sup> Berman, E et al (1997), Implications of Skills Biased Technical Change: International Evidence. CEP Discussion Paper no. 367

participation in poorer neighbourhoods had been particularly depressed during the 1990s. The growth in higher education participation was faster for poorer neighbourhoods, at least from 2002 onwards. This latter finding is potentially extremely important, given that student grants were re-introduced for full time undergraduates in 2002 in Wales. Enrolment on first degrees grew more rapidly in poorer neighbourhoods for the period 2002 onwards, i.e. after the re-introduction of the student grant.<sup>6</sup> This shows that financial support for students from poorer backgrounds can increase participation into higher education.

## **Consultation**

All relevant stakeholders have been consulted. A technical consultation paper on the implementation of the proposed new system of higher education funding and student finance was published on the Assembly Government's consultation web page. Key stakeholders consulted include:

- HEIs in Wales
- Higher Education Wales
- Further education colleges in Wales
- NUS Wales
- Student unions
- Local authorities in Wales
- Student Loans Company
- Higher Education Funding Council for Wales
- UCAS
- Children in Wales
- National Association of Student Money Advisers
- Student Finance Officers in local authorities, HEIs and further education colleges

The consultation period lasted four weeks. 25 written responses were received - an analysis of the individual consultation responses is at **Annex 1**.

In addition to the consultation paper, a stakeholder workshop was held on 24 January 2011. 41 stakeholder representatives attended the consultation event. Details of the views expressed by participants in the workshop are given at **Annex 2**.

The consultation paper and stakeholder workshop focused on a small number of key implementation issues and questions. A summary of the views expressed by stakeholders in both their written responses and the wider stakeholder workshop follows:

---

<sup>6</sup> Marcenaro-Gutierrez, O and Vignoles, A (2006), Trends in HE participation by neighbourhood: evidence for Wales Update - Report to the Economic Research Advisory Panel, Welsh Assembly Government

Consultation questions	Summary of responses
<p><b>Q1.</b> If institutions in Wales wish to set tuition fees above the basic fee rate they will be required to have in place fee plans agreed by HEFCW. The Government intends that fee plans in Wales will include provisions relating to reconfiguration of the HE sector and other <i>For Our Future</i> strategic priorities.</p> <p><b>How should those provisions be expressed? What other issues should the fee planning guidance address? Are there other conditions you think should be imposed on HEIs wishing to charge more than the basic rate of fee?</b></p>	<p>The consultation responses showed a mix of views. There was broad support, both in the written responses and the stakeholder seminar, for the principle that fee plans should continue to focus on widening participation in higher education, particularly by those from under-represented or non-traditional groups. Other objectives to be supported by fee plans should be those already set out in the Assembly Government's "<i>For Our Future</i>" strategy for higher education and HEFCW's Strategic Plan. Some respondents suggested that since fee plans will be intrinsically linked to the ability to charge higher tuition fees, they should reflect an expectation on HEIs to improve the learning experience for students. Some respondents acknowledged the potential role of fee plans in furthering the process of reconfiguration in the Welsh higher education sector; however, there was relatively little support for that approach. One written response highlighted the need for widening access provisions to take specific account of the needs of disabled students. Some further education colleges which provide higher education courses on behalf of HEIs argued that fee income should follow the student and should be with the relevant provider to cover direct costs. Some respondents considered that fee plans should make explicit reference to part-time higher education provision.</p>
<p><b>Q2.</b> The Minister has suggested setting the basic fee rate (that is the tuition fee level above which institutions would be required to submit a fee plan to HEFCW for approval) at £6,000 per annum, the same level as in England. There is the potential, however, for the basic fee rate to be set at a lower level – perhaps even at the present maximum rate (£3375 for</p>	<p>The majority of written responses (particularly those from HEIs) argued that the basic amount of fee in Wales should remain at the proposed £6,000 in order to maintain parity with England. The stakeholder workshop demonstrated a greater variety of views on this question, however, with little consistency among the stakeholders present as to the preferred level of the basic fee amount.</p>

<p>AY2011/12 AY). <b>What would be the advantages or disadvantages of a lower basic fee rate in Wales? What criteria do you consider should be used to determine the level of the basic fee rate?</b></p>	
<p><b>Q3.</b> We intend to introduce a relatively simple, non-burdensome fee grant scheme for Wales, of the sort described in paragraph 7(c) above. <b>How might that scheme be designed to minimise the administrative burden on HEIs and HEFCW?</b></p>	<p>The stakeholder seminar demonstrated a good deal of support for the idea that the Student Loans Company rather than HEFCW might administer the new fee grant. Few of the written responses made the same suggestion; a number suggested that to keep the administrative costs of the grant scheme low there should be continued dialogue between the Assembly Government, HEIs in Wales and the chosen delivery partner to administer the fee grant. Some respondents argued in favour of a centralised model of delivery for student finance in Wales, akin to that already adopted in England. Some respondents argued that the fee grant mechanism should take account of the cash-flow needs of institutions.</p>
<p><b>Q4.</b> A Programme Delivery Board has been established to oversee implementation of the 2012/13 HE funding and student finance arrangements for Wales. Our main delivery partners are represented on the Board, which will be developing mechanisms for ongoing consultation and communication with other stakeholders, including a series of workshops on particular topics. <b>What would be the most effective means of engagement and further consultation on the implementation issues identified in this paper?</b></p>	<p>HEIs expressed concern that the Programme Delivery Board does not include specific representation by the sector. There was a broad level of agreement at the stakeholder event that implementation of the new system should involve close working with the National Union of Students and HEIs (including Student Services/Finance staff). In general, respondents urged the use of a range of communications and engagement techniques at local, regional and national level and making use of existing networks or forums such as Higher Education Wales, Welsh Higher Education Finance Directors Group, National Association of Student Money Advisors and Welsh Higher Education Student Finance Practitioners Group to facilitate communication and collaborative working. Participants in the stakeholder workshop supported strongly the proposal that there should be separate consultation on changes</p>

	<p>to part-time higher education and student support when the policy details are available. Several respondents suggested that the Board should include or have direct input from operational staff in university registry and student services departments as well as local authority student finance staff. Respondents representing further education providers argued that there should be specific representation from that sector.</p>
<p><b>Q5. Are there other ways in which Student Finance Wales processes could be simplified to reduce complexity and cost?</b></p>	<p>Few respondents had views on this question. Some respondents argued that one significant simplification to existing systems could be achieved through greater stability and fewer year-on-year changes to student support entitlements.</p>
<p><b>Other issues raised in consultation</b></p>	<p>Some respondents (HEIs) suggested that fee plans under the new system should be reviewed after 3 years and not before. Other respondents commented on the need to ensure that HEIs in Wales are able to set fee levels to a similar timescale as those in England so that students wishing to enter higher education in 2012 are able to take properly informed decisions about their institution(s) of choice. Several respondents raised issues about the timing of implementation of the changes proposed. Some respondents sought clarification of the place of the Financial Contingency / Hardship Fund (currently provided by the Assembly Government) in the new policy context.</p>

## Competition assessment

The results of the competition filter test are set out below:

The competition filter test	
Question	Answer yes or no
<b>Q1:</b> In the market(s) affected by the new regulation, does any firm have more than 10% market share?	No
<b>Q2:</b> In the market(s) affected by the new regulation, does any firm have more than 20% market share?	No
<b>Q3:</b> In the market(s) affected by the new regulation, do the largest three firms together have at least	

The competition filter test	
Question	Answer yes or no
50% market share?	No
<b>Q4:</b> Would the costs of the regulation affect some firms substantially more than others?	No
<b>Q5:</b> Is the regulation likely to affect the market structure, changing the number or size of businesses/organisation?	No
<b>Q6:</b> Would the regulation lead to higher set-up costs for new or potential suppliers that existing suppliers do not have to meet?	No
<b>Q7:</b> Would the regulation lead to higher ongoing costs for new or potential suppliers that existing suppliers do not have to meet?	No
<b>Q8:</b> Is the sector characterised by rapid technological change?	No
<b>Q9:</b> Would the regulation restrict the ability of suppliers to choose the price, quality, range or location of their products?	Yes – a statutory limit will be imposed on the amount of fees chargeable by HEIs in Wales under powers given by the Higher Education Act 2004

### Post implementation review

This suite of legislation is being introduced now because of the relatively long lead-in time required to ensure that the new higher education funding and student finance systems can be implemented effectively for academic year 2012/13.

The objective of the post implementation review will be to assess whether the reforms to higher education funding and student finance are operating as expected and whether they have achieved the policy objectives set. The review will need to be based on an ongoing evaluation of the reforms and their impact, taking account of the fact that the new systems will not be fully operational until 2014/15 when three full cohorts of students will have entered higher education under the new tuition fee and student finance regime proposed.

### Policy objectives / success criteria:

- promote the delivery of the Assembly Government’s “For Our Future” strategy for higher education;

- increase social mobility;
- mitigate the impact of higher tuition fees on students ordinarily resident in Wales and student debt;
- ensure a sustainably funded higher education sector in Wales;
- attract a higher proportion of Wales resident students from disadvantaged backgrounds into higher education.

Many aspects of the baseline position in relation to these success criteria are readily available from administrative data sources – including information on overall levels of applications, participation and completion of different types of students in different types of institution, modes of study, or subject areas. Information is also available on overall costs and institutional finances. The National Student Survey and Student Income and Expenditure Survey provide information on student satisfaction, student finances. For some areas, such as social mobility, it may be necessary to establish proxy measures or leading indicators against which progress can be measured.

ANNEX 1 Equality Impact Assessment

Equality Strand	Summary of evidence Identified and gathered	Weighting [Credibility of evidence] Tick appropriate box			Relevance of <b>evidence</b>  [Equality issues raised by evidence]	Policy or practice relevance <b>to equality strand</b> Tick appropriate box			
		Unsatisfactory	Satisfactory	Strong		No relevance	Low	Medium	High
Disability	<p>Direct comparison between the student and general (16 to 64) populations is not possible, due to the different definitions of disability recorded by HESA and the Annual Population Survey (APS). However, some analysis can be made:</p> <ul style="list-style-type: none"> <li>The proportion of students at Welsh HEIs with a disability has risen from 8.2 per cent to 10 per cent since 2004/05. There has been a similar increase in the representation of those stating they had a disability amongst Welsh domiciled students (up from 7.2 per cent to 9.1 per cent).</li> </ul>		X		<p>None. No change is proposed to the statutory student support provided for students with disabilities in the form of Disabled Students Allowance (DSA) and Special Support Grant.</p> <p>DSA is a non means-tested allowance that provides:</p> <ul style="list-style-type: none"> <li>a specialist equipment allowance of up to £5,166 for the whole course;</li> <li>a non-medical helper's allowance of up to £20,520 each year;</li> <li>a general disabled student's</li> </ul>	X			

	<ul style="list-style-type: none"> <li>• The APS shows a slight decrease in the proportion of people stating they had a disability in Wales and the UK between 2005 and 2009. In 2009, 21.7 per cent of Welsh domiciles and 18.8 per cent of UK domiciles stated that they had a disability.</li> <li>• Persons with a disability are more likely to hold no qualifications than non-disabled persons, and less likely to hold qualifications at level 2 or above.</li> </ul>				<p>allowance of up to £1,729 each year;</p> <ul style="list-style-type: none"> <li>• extra travel costs incurred as a result of a disability.</li> </ul>				
Race	<ul style="list-style-type: none"> <li>• The proportion of Welsh domiciled students from the minority ethnic population has increased from 5.1 per cent in 2004/05 to 6.2 per cent in 2008/09. It remains similar to the proportion of UK domiciled minority ethnic students at Welsh HEIs and above the minority ethnic population as a proportion of the total population aged 16 to 64 in Wales, which in 2009 was 3.7 per cent, up from 2.6 per cent in 2005.</li> <li>• Asian students made up the largest proportion of the ethnic minority group.</li> <li>• Persons from a non-white ethnic origin are more likely to hold</li> </ul>			x	No specific issues.		X		

		<p>degree-level qualifications than the population as a whole (36 per cent compared with 29 per cent).</p> <ul style="list-style-type: none"> <li>• However, students from different ethnic minority groups have different outcomes when studying for their first degree, with students from some ethnic minority groups far less likely to leave university with a first or upper second class degree than others.</li> </ul>							
Gender and Reassignment	Gender	<ul style="list-style-type: none"> <li>• Women continue to have greater representation at HEIs than men. In 2008/09, 57.5 per cent of Welsh domicile students were women, similar to 2004/05 and slightly above the proportion at Welsh HEIs who are women.</li> <li>• Across the UK, in 2008/09, subject areas with a high proportion of women included subjects allied to medicine (80%), veterinary science (76%), education (76%) and languages (68%). Subject areas with a high proportion of men included engineering and technology (84%), computer science (81%) and architecture, building and planning (69%).</li> </ul>			x	<p>The lack of certain subjects in Wales – eg veterinary medicine – in which women predominate suggests that providing equivalent support to all Welsh domiciled students irrespective of their place of study might contribute positively to gender equality.</p>		X	

Age	<ul style="list-style-type: none"> <li>• The proportion of adults with no qualifications increases with age.</li> <li>• Across the UK, In 2008/09 two-fifths (41%) of students in the first year of their first undergraduate degree were 18 years and under. Almost the same number were 19-24-years-old (38%), 7% were aged 25-29 and the remainder (14%) were over 30.</li> <li>• Older students (25 years and over) studying in the first year of their first degree made up a large proportion of those studying part-time (77%) compared to those under 25 (23%). One in 5 (21%) of UK domiciled entrants on full-time first degree courses, and 59 % on other full-time undergraduate courses were aged 21 and over.</li> <li>• 58% of part-time first degree entrants were aged 30 or over.</li> </ul>	X			Introduction of tuition fee loans for part-time students will provide additional support for older learners who comprise a significant proportion of the part-time population.				X
Religion and Belief and Non-Belief	<ul style="list-style-type: none"> <li>• The Equalities and Human Rights Commission reports that there is no robust data available on religion or belief in respect of higher education.</li> </ul>	X			The UK government proposes to raise the amount of interest charged on student loans from 2012/13. The Federation of Student Islamic Societies has expressed concern that this			X	

				<p>could have a negative impact on some Muslim students who may be deterred from accessing student loans because such interest charges are seen to contradict Muslim teaching on finance.</p> <p>The government argues that student loans are not a form of commercial lending. Under the new arrangements proposed, the government (and the Assembly Government) will continue to subsidise the student support system and there is no element of profit-making from student support.</p>				
Sexual Orientation	<ul style="list-style-type: none"> <li>The Higher Education Statistics Authority does not collect data on sexual orientation or transgender status and no robust statistics are collected from other sources. Little research has been conducted into the experiences of LGBT students in higher education.</li> </ul>	X		<p>The Equality and Human Right Commission reports a single qualitative study which found that LGBT students report being treated negatively on the grounds of their sexual orientation or gender status by fellow students and to a lesser degree by tutors, lecturers and other staff. In the same study, transgender students reported encountering higher levels of negative treatment than LGB students. The experience of LGBT students in university is</p>	X			

					not, however, a product of the student support system.				
Human Rights (see Annexe A for more information)	No additional data available.	X			None.	X			

## Annex 2: Consultation Responses

Name & organisation	Q1. Fee planning guidance	Q2. Advantages / Disadvantages of lower basic fee rate	Q3. Design to minimise admin burden	Q4. Implementation issues	Q5. Simplify SFW processes	Q6. Any other related issues
<b>Margaret Phelan University and College Union</b>	<p>Demonstrable/evidenced improvements in student and staff engagement within institutions should be a required as a condition of the fee plans. All institutions should have effective mechanisms for evaluating the student experience. Clearly UCU would argue strongly that effective student support requires an appropriate level of staffing with the time in timetables to be able to deliver that effective support at the front line. UCU would argue strongly for institutions to be required to allow more time in the teaching time tables for the tutorial support necessary to improve rates of retention. This time should be costed and be a required, clear component of any fee plan. UCU believe that institutions wishing to charge more than the basic fee rate in Wales should be required to use a proportion of that fee to provide job security for staff on atypical</p>	<p>UCU would be extremely concerned at the perception that a such a move might create. It is our view that given the rate set in England that Wales must not take a decision which could suggest that the fees are cheaper in Wales because the education one receives is not as good as England.</p>	<p>A technical issue best dealt with by the institutions</p>	<p>Whatever method is chosen, UCU would argue that its members are key to delivering student support and therefore they must be involved in that process.</p>	<p>A matter for institutions and NUS.</p>	<p>No comment supplied</p>

	<p>contracts, for example rolling fixed term contracts. They argue that the uncertainties in funding, especially with regard to research funding, requires them to act in this way. One way to ensure a future for the research base in Wales would be to attract key research staff to work in institutions in Wales. This could be done by offering permanent contracts to research staff currently working on a series of fixed term contracts elsewhere in the UK. Their ability to charge above the basic fee rate would provide funding and prevent them for continuing to use funding uncertainties argument. HEFCW might want to consider expressing this in the guidance as the need to see a percentage reduction over a period of years. We would also wish to see a review period within the period covering the fee plan, not just at the end of the plan period.</p>					
--	--	--	--	--	--	--

<p><b>Mike Williams Coleg Sir Gar</b></p>	<p>From and FE perspective, and as a College that franchises provision from HEIs, some consideration needs to be given to percentage of the student fee that a franchising HEI is allowed to keep (ie, a maximum needs to be set). We have experienced a situation whereby 30% of the 'fee grant' was retained by the franchising HEI in addition to 30% of the HEFCW funding. Our view is that the fee needs to be with the provider to pay for direct costs, development and to ensure the quality of provision, ie, supporting front line services.</p> <p>2. Institutions charging over and above the basic fee rate need to set out student entitlement. We are convinced that as higher fees are charged, student expectations will increase and students will need reassurance about levels of service, delivery and support etc they can expect.</p> <p>3. We are mindful that the Minister has already announced that access to the new fee regime, will be dependent on HEI reconfiguration (with 6 HEIs being preferred). We would assume (unless informed otherwise) that our membership of the Dual Sector University with TSD (and other partners in</p>	<p>We see no advantages in setting a lower basic fee rate in Wales compared to England and agree that it would be sensible to have a basic rate that is in line with England at £6000. In determining the basic fee rate level, the existing funding package (ie, what is currently HEFCW teaching grant and student fee) needs to be considered in relation to this. Only when institutions set fee levels that will attract income over and above what is the norm currently, should additional fee plans be required</p>	<p>The proposed scheme sounds simple and there is recent experience of managing fee grant monies through HEFCW. Could there be a link to the target 'capped' FT numbers set by HEFCW (subject to confirmation on recruitment)?</p>	<p>Draft written proposals circulated to the sector backed up by opportunities for face-to-face regional meetings would be our preferred option.</p>	<p>Centralisation of the processing of applications as in England -to allow access to supporting bodies to clarify information required (ie, HMRC to qualify parental/student income). Better procedures for part time students.</p>	<p>No comment supplied</p>
---	--	---	--	--	--	----------------------------

	<p>SWW) addresses this issue from a directly funded FEI perspective. This has required significant adjustment for us and a refocusing of our partnerships within region. 4. As is the practice currently, institutions need to set out the financial assistance that will be available for students by means of bursaries etc. The issue of FT fees and PT fees needs to be resolved, identifying what the expectations are for PT students in future.</p>					
--	--	--	--	--	--	--

<p><b>Peter Haughton Denbighshire County Council</b></p>	<p>HEIs should have strong, mutually binding, legal contracts with all applicants to ensure that the expected level of service, including tuition, is provided by them and that participation by students is satisfactory. In the days of Mandatory Student Grants, there were three rates of fee for home students based upon the nature of the course. Purely academic lecture room based the latter plus a significant element of lab and / or field work or Medical, Dental or Veterinary. There is a certain correlation with respect to the tuition regime and expected earnings with the three basic course models; would a similar scheme be worth considering?</p>	<p>One advantage might be that it would attract more applicants to Welsh HEIs, giving them the opportunity to accept only those with the highest entry qualifications. This would ensure the selection of a base line student population with the highest academic potential. Different rates of fees would potentially cause confusion to applicants filling in either paper or online applications for student support. A definitive set of criteria that would fit all situations and establishments would be difficult to determine as it could be subject to many differing factors. For instance one HEI might have a particular faculty that has a world class reputation for excellence compared</p>	<p>Cut out the suggested HEFCW involvement from the equation and administer all the tuition fee support in the same way through the LAs as the existing residual Tuition Fee Grants. This would ensure that the appropriate support would be available to students studying in all UK domiciles as the LAs already have a proven track record for delivering the service.</p>	<p>Whilst not having details of the Board membership If WAG are running true to recent form it will primarily be at the “strategic level “. I would however strongly recommend the involvement of a judicious mix of both strategic and operational stakeholders. The devil is quite often in the detail with respect to the delivery of student support and it is potentially dangerous to have theorists in charge of the development and implementation process without also actively consulting on the operational viability of the proposals with those who currently and in the future will be expected to deliver the support .</p>	<p>Ensure that the Student Loans Company's, Protocol software is actually fully fit for purpose. Ensure that the course fees are hard coded into the HEI course data base to ensure the correct level is displayed on the online application and relevant sections of the LA data entry screens.</p>	<p>Given the lower rate of fees in Wales is there not a possibility of higher numbers of EU students taking advantage of this to the detriment of home students. If this indeed proved to be the case would a cap on the number of EU students in Welsh HEIs be considered? Given the increasing cost of studying in the UK would the Minister give consideration to funding cheaper comparable and appropriately accredited courses at overseas institutions?</p>
--	---	--	---	--	--	--

		<p>to another with a mediocre reputation and both would be offering a course with the same qualification. Should one be allowed to charge a premium on their fees because of their reputation for excellence and the additional opportunities they offer? The performance of HEIs should be closely monitored and action taken against those who are performing badly. Basically students would be expected to pay the appropriate rate of fee for the level of service provided. It would then be up to the HEI perform to the expected standard in order to gain and retain the right to charge higher rate fees. Conversely those that continue to underperform could be compelled to reduce or refund a</p>				
--	--	---	--	--	--	--

		proportion of their tuition fees to those students they have failed. The other option in this scenario is the possibility of partial or full tuition fee waivers for eligible students undertaking unsupported periods of repeat study due to a failure on the part of their HEI.				
--	--	---	--	--	--	--

<p><b>Dr David Grant Cardiff University</b></p>	<p>Under the proposed new fee system the overall level of funding for teaching will stay approximately the same as at present but the burden of cost will be shifted significantly from the state to the student. As such it seems appropriate that the fee plan to access the new fee regime should relate predominantly to the student experience and other aspects of For our Future and the HEFCW Corporate Strategy relevant to the student experience (including widening access), to ensure that students are receiving a good value education for their increased investment and that the additional cost does not discourage students from low income backgrounds from entering higher education. Cardiff continues to work towards all areas of the For our Future and the HEFCW Strategy and will demonstrate an appropriate contribution to all priority areas. Input targets, such as money spent in support of a particular activity, are not an effective way of measuring progress as there is no guarantee for WAG/HEFCW that the desired outcomes will transpire. It should also be noted</p>	<p>While there may be some superficial attraction in setting a basic rate at a lower level the consequences could be serious and would need to be carefully considered. From a marketing perspective having a lower basic fee rate than England would make Welsh higher education look cheap to non-Welsh students and may therefore pull in greater numbers of applications from beyond Wales, but under the proposed arrangements for tuition fee compensation, the lower fee level would offer no competitive advantage in attracting Welsh students. Meanwhile given the parameters within which the HE funding methodology for 2012/13 onwards is being planned (ie that no HEI would be</p>	<p>Whilst the previous system that was established with the Student Loans' Company had some initial difficulties it worked relatively well once established. A transaction directly between HEFCW and universities would require one or other to undertake eligibility assessment for each Welsh-domiciled student (this check is currently done by the SLC/LEA as part of the statutory student support assessment). It would be unlikely to be cost-effective to require this assessment of eligibility to be undertaken by</p>	<p>HEIs have a major role in delivering student finance and together with their role in providing advice to students this means that they are well placed to work together with WAG and HEFCW on the effective introduction of new student finance measures. It is therefore disappointing to note that there is no HE representative on the Programme Delivery Board. We would urge the board to draw on the expertise of higher education institutions at appropriate stages in its discussions in order to ensure that appropriate recognition is given to the impact that the implementation of the Assembly Government's new fee proposals will have upon both HEIs and their students.</p>	<p>No comment made</p>	<p>We believe that it would be appropriate for fee plans to be reviewed after three years. A timescale for review any shorter than this would not allow sufficient time for institutions to be able to show progress against their targets and would be unduly bureaucratic to implement. We would expect that any arrangements that are introduced need to be appropriate for the medium to long term. Any short term measures will inevitably lead to confusion for students and HEIs, and be wasteful of the resources necessary to develop and</p>
---	---	---	---	--	------------------------	--

	<p>that the new fee regime will be delivering little or no additional funds to the HE sector when combined with HEFCW cuts and so it would not be reasonable to expect institutions to be making significant additional expenditure as part of their fee plans. Outcome targets would be a better way of monitoring progress than financial expenditure targets and would ensure that real change against WAG priorities is delivered. Universities already have a set of national targets set out in the HEFCW Corporate Strategy, against which they are monitored. It would be appropriate for a simple set of targets to form the basis both of the fee plans and for HEFCW Corporate Strategy (with any adjustments that are necessary) and for the fee planning process to be linked to the existing process for monitoring performance against the HEFCW Corporate Strategy and the delivery of For our Future. The link between the introduction of the new fee regime and the drive for reconfiguration and collaboration needs to be expressed carefully; any fee plan provisions relating to</p>	<p>worse off under the new system than it would otherwise have been) HEFCW would need to find balancing funding to compensate the institution for the lower fee rate charged to non-Welsh students. If the HEFCW “institutional subsidy” is automatic and ensures that any institution choosing to set lower rates is compensated for the absence of new fee income there could be perverse consequences. We understand that WAG modelling work for the sector has shown that the average fee level necessary to allow historical funding levels to be maintained is ca. £6000. There is a significant risk that setting a basic fee rate lower than K£6 would be financially burdensome to WAG.</p>	<p>HEFCW or universities. Careful attention will need to be paid to detailed student communications on this matter. For example, under the previous tuition fee grant introduced in 2007 students were asked what fee they were being charged when filling out forms to be assessed for financial support. However the wording of the question led to significant confusion as, for Welsh-domiciled students it was not clear whether they were being asked for the figure before or after the tuition fee grant had been taken into account. This</p>	<p>Workshops on specific topics may indeed be useful, as may task groups of experts from the sector and other organisations to look at specific issues. The exact mechanism of consultation is perhaps not as important as ensuring that, if there are issues which are going to affect universities, those institutions are given sufficient opportunity to make a genuine contribution to the discussion and help the Assembly Government and HEFCW to deliver processes and policies that are fit for purpose.</p>	<p>implement the new system (in WAG, HEFCW and the sector). We do, however, recognise that these are major changes to the fee and student finance arrangements that are being introduced. The policies introduced and accompanying funding mechanisms should therefore be kept under scrutiny to ensure they are fit for purpose and a comprehensive review be scheduled after a suitable period of operation. Provision of a quality student experience has different costs in different subject areas. It must be recognised that while the</p>
--	---	--	--	---	---

	<p>reconfiguration need to explained in a way that ensure that the student experience remains at the heart of the requirements on institutions. Any targets relating to reconfiguration in fee plans might therefore be linked to HEFCW Corporate Strategy target 11 and ask of institutions whether they have, or are moving towards, a critical mass sufficient to assure a high quality student experience, an acceptable range of educational provision in both breadth and depth and student services and support appropriate to student needs and appropriate to their mission. For a university like Cardiff this would ensure that the particular demands of a research-led teaching experience were reflected. Using a target of this type would also ensure that past reconfiguration activity is acknowledged within the fee plan provisions.</p>	<p>The lower the fees across the sector the higher the level of institutional subsidy that HEFCW would need to provide if it were to balance the funding with historical levels. Meanwhile, institutions setting fees in excess of K£7 to maintain and develop the quality of the student experience would receive little or no “institutional subsidy” for their efforts but also would find that there was a reducing balance of funding available from HEFCW to support high-cost strategic subjects. We are not supportive of a lower rate being set as we believe there is a significant danger of widening the funding gap between English and Welsh higher education even further, of compromising the quality of the student</p>	<p>often resulted in students needing to resubmit funding applications to their LEAs, delays in registration and to funding received. Such delays can cause distress to students and a serious administrative problem for universities. The Assembly Government should ensure that all statutory forms make clear the information to be provided by Welsh domiciled students in relation to the fees that they are paying. The involvement of university staff in drawing up detailed communications to students on financial support</p>			<p>substantial planned increases in student fees shift substantially the burden of funding from the state to the individual student, even at the maximum level of fees the full cost of education in strategically important subjects – science, engineering, medicine and dentistry for example – will not be met from student fees alone. Assurance is sought from WAG and HEFCW on how such subjects will still be supported in Wales in a manner which ensures a high quality student experience can still be funded and delivered.</p>
--	--	--	---	--	--	---

		<p>experience and of creating the perception at large of a cheap and underfunded HE sector in Wales. Maintaining parity of funding and parity of esteem with England is vital for universities that recruit from across the UK. Should, however, the decision be taken that the standard rate be lowered or removed in Wales, we would argue that any institution choosing to charge fees at below the standard rate agreed in England (anticipated to be K£6) do so at their own risk. Any institutional subsidy that is paid to universities in Wales should be limited and calculated against the assumption of all institutions having charged fees at least at the standard rate in England.</p>	<p>matters will be vital if all complexities are to be addressed. Issues such as dates for withdrawal from courses and eligibility for payment of all or a proportion of fees do differ between institutions and will need to be clarified in advance to all students.</p>			<p>We are very conscious that the delivery expectations of students will increase as they pay more for their education. We are also aware that the proposals under consideration may not actually ensure any additional funding to the universities to deliver on those expectations. We would therefore argue that the responsibilities of HEFCW to reflect the differing costs of teaching in subject areas be maintained and HEFCW teaching funding for universities must continue to reflect the different subject mixes and cost of provision at those universities and</p>
--	--	---	--	--	--	--

						not simply be modelled on an historical cost basis.
--	--	--	--	--	--	---

<p><b>Kym Roberts Skill Wales</b></p>	<p>Skill Wales urges the Welsh Assembly Government to state their expectations of HEIs (planning to set tuition fees above the fee rate) for widening access strategies and action, for the specific participation, support and progression of disabled students. This will include putting in place, action based monitoring mechanisms. Statistics show that over 50% (ONS 2009) of disabled people are unemployed, while the economic fate of young disabled people is significantly equalised through access to higher education, where differences in employment rates reduce to within a narrow percentile. This is ultimately significant to the social justice drivers of the Welsh Assembly Government, and the economy of Wales, and the work being undertaken in relation to NEET. It is imperative therefore, that young disabled people participate and succeed in higher education.</p>	<p>The concern of Skill Wales for those HEIs who wish to retain fees at lower than the revised fee level, is that conversely, access to higher education by young disabled people could be affected adversely. We seek re-assurance that the access to higher education for young disabled people will be secured and promoted.</p>	<p>No comment made.</p>	<p>No comment made.</p>	<p>No comment made.</p>	<p>No comment made.</p>
---------------------------------------	---	---	-------------------------	-------------------------	-------------------------	-------------------------

<p><b>David Moyle Higher Education Liaison officers Association (HELOA Wales)</b></p>	<p>The fee plan conditions that should be imposed on HEIs is a matter that our members feel should be addressed by our individual institutions, in consultation with the Assembly Government and HEFCW.</p>	<p>HELOA Wales cannot see any real advantages of implementing a fee rate lower than that proposed by the Minister for Education. Given the reductions in public funding for higher education over the coming years, the raising of the basic fee rate would appear to be the most likely mechanism of bridging this shortfall to ensure that the HE sector in Wales continues to deliver excellence in teaching, research and the student experience. Every necessary step should be taken by the Assembly Government and HEFCW to ensure that the exiting funding gap between England and Wales does not widen in the coming years. Our members are concerned about the</p>	<p>HELOA Wales feels that the issues regarding reducing the administrative burdens of the fee grant scheme on HEIs and HEFCW is a debate best advanced through consultation with individual HEIs and their finance offices.</p>	<p>HELOA Wales would welcome the opportunity to feed into the Programme Delivery Board. Our members have regular contact with the vast majority of post-16 education providers in Wales. We are therefore on the 'front-line' with regard to communicating the emerging student financial provision to students considering entry into higher education. We feel that for further discussions and engagement to be most fruitful, consultations should take place on a number of different levels: Local (individual HEIs), Regional (HEI partnerships), and National (stakeholder organisations).</p>	<p>HELOA Wales feel that any changes to the existing Student Finance Wales mechanisms should be developed so that the process is as simple and non-burdensome for the end user as is possible. Timely publication of the student finance provision (e.g. maintenance loan thresholds) would reduce some of the anxieties amongst students and parents concerned about the financial aspects of entry into HE. We feel that</p>	<p>There is a considerable risk that we could find ourselves at a significant marketing disadvantage if fee levels in Wales are not published before or shortly after similar announcements from HEIs in England. Students wishing to enter HE in 2012 are likely to be conducting their initial research over the coming months, so it is vital that Welsh HEIs are able to publish their fee thresholds at the earliest opportunity.</p>
---	---	--	---	--	--	--

		<p>potential for fee pricing becoming inextricably linked with quality. For example, if one institution was to charge £9,000 per year and another to charge £7,000, would a student looking at the figures automatically assume that the 'cheaper' HEI offered less quality? In the event that there are differences in 2012/13 fee levels across Wales, this price:quality perception is something that will need addressing by HEIs, HEFCW and the Assembly Government.</p>			<p>publication of student financial provision should be made available in the January of the year of entry, with details readily available on SFW website.</p>	
--	--	---	--	--	--	--

<p><b>Helen Jeffery, Management Accountant Coleg Gwent</b></p>	<p>No comment made.</p>	<p>Advantages: A lower rate in Wales will give the students a chance to repay their debt in line with their expected future income levels. The lower fee will encourage Welsh resident students to remain in Wales. Disadvantages: If the fee is lower, then there may be an influx of English students who want to attend University but do not want to pay the inflated fees charged in England. These students may move back to England after completing their course meaning a potential loss of skilled employees and income.</p>	<p>No comment made.</p>	<p>No comment made.</p>	<p>We currently offer a HE provision which is franchised through two Universities. Our students apply to Student Finance Wales for help with their costs, but we are not allowed to contact Student Finance directly to discuss our student's fees. It would be very useful for Colleges to be able to contact Student Finance directly when we have a query regarding one of our student's fees or discover that they have applied using incorrect course information. This would</p>	<p>No comment made.</p>
--	-------------------------	--	-------------------------	-------------------------	--	-------------------------

					ensure that any corrections required by Student Finance would be dealt with promptly thereby releasing the payments and reducing the administration work at both ends.	
<b>Elaine Moore Alliance of Sector Skills Councils</b>	Publication of an Employability Strategy, with details of the content to enable students to see how this issue is articulated. The obligation to publish data on origin of student intake if they plan to charge more and to demonstrate how the commitment to Widening Access is to be maintained.	Advantages: Attract greater diversity of students; Retain more Welsh-educated students.  Disadvantages: (Appear to) Undercut other universities; Create 'market' rivalry on the basis of fees not standards.	We very much support the principle that the funding should always be linked to the individual student and not the course followed nor the institution attended. This should enable	Not set up additional mechanisms but use existing channels and structures.	Perhaps some worked through examples could be provided to illustrate different scenarios as they might affect a range of individuals to ensure that Welsh students	The principles being applied in WAG's proposals are about ensuring equality of opportunity and support to widening access for a greater range of students. In making

		Criteria: No disadvantage caused to p/t students	appropriate adjustments to be made in future as required and enable data to be generated that shows the impact overtime of differential fees on the cohort of students who study at various HEIs		understand what it means for them if an HEI decides to charge more.	proposals about funding systems, it is important to ensure that inadvertent consequences can be quickly addressed and regulations changed if necessary. This may require a more holistic approach than the checking of figures and funding arrangements implies.
<b>SIMON PHILLIPS, SAM HEAL &amp; ALLISON JONES UNIVERSITY OF WALES, NEWPORT</b>	No comment made.	We ask that WAG undertake detailed market research within Wales in order to understand better the impact that increased tuition fees may have on peoples' perception of the financial accessibility of higher education. Does WAG know what levels of debt aversion people in Wales have and how	No comment made.	No comment made.	No comment made.	We would like the Minister, when considering responses to this Consultation, to also take into account the reduction in the Financial Contingency Fund budget. Newport is part of a Financial Contingency Fund Administrators

		will these perceptions impact on their higher education and vocational aspirations?				Group which undertook a survey that was submitted to the Assembly in 2007. The results of this survey demonstrated the advantage of a locally administered hardship fund. It proved that a client centred approach, which is accessible and able to respond individual circumstances maximises the positive effect FCF has on the retention and progression of students. There has not been a reduction to date in Further Education FCF, yet there are a high number of FE students studying at Newport, who need support with childcare in
--	--	---	--	--	--	--

						<p>particular and disability costs, since there are ineligible to claim Disabled Student's Allowance. A large proportion of the fund is also spent on helping students to cover the cost of diagnostic tests, which is not funded by Local Education Authorities. In order that Newport is able to retain students who experience unexpected and emergency situations, it is vital that FCF remain at its current level so that these students can be supported.</p>
--	--	--	--	--	--	--

<p><b>Professor Noel G Lloyd, Vice-Chancellor;</b></p> <p><b>Aberystwyth University</b></p>	<p>The new tuition fee regime provides the opportunity for HEIs to make further progress in achieving the strategic priorities contained in For Our Future. At institutional level, AU's strategic planning takes account of these priorities, and we recognise our responsibility to account transparently to the WAG for the use of public monies and to explain how we are contributing to the Government's objectives. We understand the arguments in favour of some reconfiguration of the HE sector. We have had experience of a number of mergers – with the Welsh Agricultural College, the Welsh College of Librarianship and, recently, IGER. Like all institutions, we have a portfolio of approaches to working with others. In some cases – and IGER is an example – merger is the appropriate mechanism. In others an agreement on strategic collaboration is the way forward. We established the Research and Enterprise Partnership with Bangor University because we were convinced that collaboration of this kind was necessary to establish the range of expertise required to be internationally competitive in</p>	<p>We believe the substantial reduction in resources available at Welsh Universities which would be the direct consequences of the introduction of a lower basic fee rate in Wales would be detrimental to the delivery of two major WAG policy priorities of supporting a buoyant economy and improving social justice.</p> <p>A major disadvantage of a lower basic fee would be that students would eventually find the student experience in Welsh HEIs degraded and inevitably therefore move in larger and larger numbers to study in English HEIs. Given the commitment of WAG to provide a non-means-tested grant to cover the balance over and above the current fee levels</p>	<p>We would wish to assist in every way possible to minimise the administrative burden and associated costs and consequently to maximise the resources which can be used to deliver an excellent student experience including a high quality learning experience. Exploring the ways to minimise the amount of duplication should be given a high priority. We would propose that the scheme should be designed to make maximum use of existing mechanisms, e.g. S.L.C. and Student Finance Wales.</p>	<p>We believe that it would be helpful to involve representatives of the sector in order to ensure that unintended consequences are avoided. We appreciate that the timetable to deliver the objectives is necessarily restricted. Using electronic means to improve the flow of information would be a sensible way to facilitate the consultation process aimed at addressing the issues involved. Using the expertise already available in the sector could be facilitated by the use of a dedicated website attached to the existing site e.g. HEFCW.</p>	<p>We support the principle underpinning the question and perhaps an external review of the operation of Student Finance Wales would be appropriate.</p>	<p>No comment made.</p>
---	--	--	--	---	--	-------------------------

	<p>research, and we are pleased with the successes that has been achieved. We are committed to broadening and deepening the partnership with Bangor we are working together to take this forward. The relationship with Bangor is an important one, but it is not exclusive, and Aberystwyth University is open to discussing with other institutions ways in which we can work together in order to deliver the strategic objectives of HEFCW. Indeed we are keen to establish more partnerships in Wales and beyond, but it is essential that these are focused, have clearly defined objectives, are based on mutual benefit, with real efficiencies and synergies.</p> <p>We also note the rapid and extensive progress being made within our region of Mid and North Wales, for which we are the lead partner. These regional developments are all taking place on the basis of the policies announced by HEFCW, and are already having a substantial impact upon the planning and the funding of HE, through the allocation of funded numbers to reflect success in reconfiguration.</p> <p>The graduate contribution needs</p>	<p>there would be a positive incentive for Welsh domiciled students to study outside Wales in order to benefit from a student experience supported by a fee regime funded at anything up to say £4,000 per capita greater than that available in Welsh HEIs if the basic fee was permitted to be below £6,000.</p> <p>At present Wales, and in particular the economy, has the benefit both of the majority of Welsh domiciled students studying at Welsh HEIs together with a substantial net inflow of English domiciled students relative to the outflow Welsh domiciled students. A relative loss of resourcing, as compared to English institutions, with the resulting inevitable effect on the student experience at Welsh</p>				
--	---	---	--	--	--	--

	<p>to be such that, as a minimum, total income following any decrease in direct public support will not be reduced and will be similar to that available to Universities in other parts of the UK. It is an important principle that institutions in Wales must be able to ensure that the provision which they offer is of a least the same quality as that available in comparator institutions elsewhere in the UK and that levels of student satisfaction remain high.</p> <p>In response to the specific questions on a fee plan in the consultation, we suggest that an element of the difference between total resource per student available following the introduction of the graduate contribution and that available currently should be used to deliver the strategic priorities contained in For Our Future. Currently the total resource consists of the existing fee together with the average unit of funding per full-time student and the capital funding provided, expressed on a per capita, basis by HEFCW.</p> <p>In the existing fee plan, designed when the current student fee was established at a maximum of</p>	<p>HEIs would be highly disadvantageous. We note currently that in the National Student Survey the average three year score in Wales over the period 2007-2009 was ahead of the average in English HEIs (Welsh HEIs average 83.3%; UK HEIs average 81.7%).</p> <p>The substantial fall in the quality of provision in Welsh HEIs as a consequence of the reduction in resourcing available as compared to the current level of total resource, (comprising the student tuition fee, HEFCW recurrent and capital funding), will also impact negatively on our International competitiveness. International students - who provide benefit to the Welsh economy - will be deterred from coming</p>				
--	---	--	--	--	--	--

	<p>£3,000, there is a requirement to devote 30% of the additional income to the support of WAG strategic priorities.</p> <p>We suggest that under this proposal a proportion of the order of 30% of the additional net income should be used to provide for the further enhancement of responses to For Our Future priorities, including:</p> <p>Additional improvements in the student experience measured by the NSS; Developments to further enhance the skills of graduates in order to improve their career prospects; Enhanced knowledge transfer; Enhanced Research performance including Research Grant Capture.</p> <p>The provisions relating to guidance for the planning should, of course, ensure the delivery of the twin priorities for Higher Education in Wales which are enhancing social justice and supporting a buoyant economy.</p>	<p>to study in Wales.</p> <p>The loss of resource resulting from the imposition of a lower basic rate would therefore impact negatively on a key priority of WAG of sustaining a buoyant economy.</p> <p>Furthermore, the consequent movement of larger numbers of Welsh-domiciled students into England noted above will inevitably mean that those who are unable to move to study will be particularly negatively affected. Students from poorer background are more likely to choose to study close to home.</p> <p>Therefore a consequence of the policy would be to impact adversely on the policy objective of WAG namely achieving greater social justice.</p>				
--	---	--	--	--	--	--

<p><b>Gwawr Hughes Skillset (SSC) The Sector Skills Council for Creative Minds</b></p>	<p>The Creative Industries is one of six key priority sectors identified by the Welsh Assembly Government in its Economic Renewal Programme and the Hargreaves' Creative Industries Strategy. We therefore believe that Higher Education has an important role to play in driving forward the creative industries, responding to employer needs. 'For Our Future - The 21st Century Higher Education Strategy and Plan for Wales' specifies that it wants to see :- "education services, which is designed with the employer and business in mind, and a supply of learning and services which is better informed about employer and business needs. This should take account of the differing contexts of small, medium and large employers and, drawing on the work of the Wales Employment and Skills Board and the Sector Skills Councils (SSCs) and others". As the Sector Skills Council for the Creative Media Industries Skillset has been proactive with the HE sector in Wales and has established effective mechanisms for ensuring provision is led and informed by industry. We have devised a</p>	<p>If the financial model works, we believe that those courses which can be delivered effectively at a lower basic fee rate should be considered whenever possible. However for those subject areas that cost more to deliver and are of economic importance to Wales such as those for the Creative Media industries, exceptional funding should be given to those courses by whatever means possible on par with STEM subjects.</p>	<p>We agree with the proposal that the fee grant follows the individual student and is paid to the institution of choice.</p>	<p>As mentioned previously, <i>For Our Future</i> makes it clear that the Welsh Assembly Government wants Higher Education provision to be designed with the employer and business in mind and that Sector Skills Councils have a key role in taking this agenda forward. The Government's Economic Renewal Programme has also specifically identified the Creative Industries as a priority sector for the Welsh economy. We therefore believe that the Programme Delivery Board should either have Sector Skills Council representation on it or that effective structures are established for consultation with those SSC's where Higher Education have been identified</p>	<p>We believe that the Student Finance Wales process should enforce baseline standards of quality and that students receive high quality information to help them choose the HEI and courses which best matches their aspirations. For example, courses that are Accredited by the industry through Skillset should be brought to the attention of students when choosing their courses. This industry accreditation should be seen as equivalent to the professional bodies'</p>	<p>No comment supplied</p>
--	---	---	---	--	---	----------------------------

	<p>system of accrediting courses in subjects across the Creative Media Industries including computer games, animation, film production and digital media. So far, we have approved 4 such courses in Wales and aim to expand such accreditation in the near future. Where institutions offer a range of courses that together interlink to provide an interdisciplinary approach to skills and knowledge, and they have strong links with the industry, we also approved HE institutes as Skillset Academies. We have an active Academy in Wales which is supported by industry and HEFCW. HE courses accredited by Skillset have technology as an integral component which involves STEM subjects. Our approval also means that employers can target their support in a variety of ways including involvement in design, delivery and in some cases by providing bursaries, scholarships and internships. Our industries need and will use high calibre graduates. The Skillset accredited courses are however at the expensive end of the current banding system. We therefore believe that Skillset Accredited courses within HE</p>			<p>as key partners in addressing the economic needs of their sectors, such as Skillset.</p>	<p>accreditation. Our industry accreditation will provide a strong signal and clear signpost to students that this particular course they are choosing has got that industry recognition and backing. And with such a wide range of courses on offer in these subjects and the variable quality, we feel that this will support informed consumer choice, especially in the creative content industries with high growth economic potential.</p>	
--	---	--	--	---	--	--

	<p>institutes in Wales should be able to receive “exceptional funding” with parity alongside STEM related subjects. Our fear is that without this funding, higher education institutions will not be able to offer these more expensive courses at the high standards that industry requires and the very education base needed for a growing part of the economy will be lost, together with the creative media industries’ confidence and support in the higher education system and their appetite to co-invest and build on the strong foundations we have established. The Skillset accreditation process should form part of the fee planning process proposed and provisions relating to reconfiguration of HE and other For Our Future strategic priorities. Indeed, Skillset via its accreditation of courses is already addressing the strategic priority within For Our Future which relates to HE meeting the needs of industry. As a Sector Skills Council with a strong employer voice in Wales, we want the Welsh Assembly Government to show commitment to the accreditation of industry courses and their</p>					
--	--	--	--	--	--	--

	exceptional financing on par with STEM subjects moving forward.					
<b>Phil Gough Swansea University</b>	The planning guidance should address the following issues: - it will not be possible to prepare fully credible fee plans without knowing how HEFCW intends to allocate its residual funds to support teaching priorities; the diversity of the sector, i.e. HEIs will have different objectives; access targets should take account of student progression; clarify what is meant by 'willingness to progress swiftly to merger and reconfiguration'; how will national and international collaborations be protected and encouraged? What appeal mechanism will be put in place. How will opportunities be provided to renegotiate fee plans? This is particularly important given the large uncertainties over the effect of fees on demand and cross-	The lower basic fee level should be set at £6,000 (uplifted by GDP). This will be comparable with England and will give HEIs more flexibility to set differential fees below £6,000.	Although there have been a number of teething problems with the Student Loan Company (SLC), it is a tried and tested mechanism. It makes no sense to introduce a high-cost parallel mechanism via HEFCW which would increase administrative costs significantly. Welsh students should continue to be awarded a tuition fee grant (TFG), if deemed	The composition of the Programme Delivery Board is noted. The Board will be considering issues which will impact significantly on HEIs and students. As such its membership should include representatives from HEIs and the student body. If the membership of the Board cannot be expanded, it is important that a parallel stakeholder group be established immediately. The stakeholder group must include representatives of HEIs and students. In	The drive to on-line delivery of the student finance system should be continued.	With regard to reconfiguration, approval should only be given to genuine mergers with the potential to release resources for front line services. The various group structures under discussion in the sector only add layers of administration and will not be able to demonstrate value for money. There is a need for mature conversations with HEIs on the

	border flows; how frequently should plans be updated - every three years is suggested.		eligible by Student Finance Wales (SFW), on receipt of an annual student support application. HEIs do not have the level of expertise or resources to assess eligibility for the TFG or to charge varying fee rates based on a student's domicile, cohort or funding regime. The adverse impact on cash flows to HEIs will have to be addressed.	particular the Welsh HE student finance practitioners group (WHESPG) should be represented. A further workshop should be held to consider part-time students. Representatives from employers should be invited to the workshop.		diverse ways in which they address social justice issues. In order to protect public investment, KPIs should be focused on the proportion of widening access students that are able to complete their courses of study.
<b>Dewi Knight Open University</b>	The OU in Wales recommends that the Government, when developing its plans on fee and loan regulations and related higher education finance proposals, bears in mind the commitment in For our Future of 'greater opportunities for individuals to learn on a part-time basis'. To encourage this, we wish to see arrangements	We note the UK Government's extension for England of the threshold from the 33% intensity (40 credits) proposed in the Browne Report, which followed the department's policy impact assessment that estimated (at	No comment supplied.	No comment supplied.	No comment supplied.	We have some concerns that the modelling released by the Department of Children, Education, Lifelong Learning & Skills to demonstrate the 'top-slicing' of the

	<p>which place the funding and support of those who study, or wish to study, on a part-time basis on an equal footing with those who study full-time. As recommended by the Department for Business Innovation &amp; Skills, all students in England who study at the equivalent of 25% or more of a full-time course (30 credits) will be eligible for a non-means tested loan for tuition. We view this as a good template for Welsh policy, ensuring as it does, a more equal access to grants and loans, regardless of mode of study.</p>	<p>33% intensity) 'around two thirds of part-time students will not be eligible for fee loans'. round 2,000 Open University students in Wales study 30 credits per year, with a further 1,000 studying at least one 30 credit course/module and another course/module. Of those studying solely a 30 point course/module, 45% are studying a STEM subject. We would also recommend that the Government considers a further 'fair access' measure by extending the eligibility for grants that cover the cost of fees for students with low household incomes to those studying 30 credits or more. Presently both the fee and course grants, dependent on household income, are only available to those who study at or</p>			<p>teaching grant to cover the non-means-tested grant for full-time undergraduates doesn't explicitly state the need to consider, and then reserve, the funding needed to support high quality teaching and learning for part-time students. It will be vital to ensure that there are no detrimental unintended consequences which flows from the settlement for full-time students and which diminishes the volume, range, quality and accessibility of part-time higher education. This is a potential function of the full-time arrangements being addressed in the first place</p>
--	---	---	--	--	---

		above 50% intensity (60 credits).				but would remind the Government that with four in ten of all undergraduates in Wales studying part-time, a significant proportion of the teaching grant goes to ensure the best student experience possible. You will be aware that, for the sixth year running, students at The Open University in Wales were more satisfied with the quality of their higher education than those at any other university in Wales, according to the National Student Survey 2010. We would not like to see the quality and range of part-time provision reduced by the gap between funding support for full-
--	--	-----------------------------------	--	--	--	---

						<p>time and part-time study. Helping deliver on the Government's principle of 'access to higher education should be on the basis of the individual's potential to benefit' and the 'secure foundation of social justice', and indication of the value and benefit of part-time learning is that almost 40% of Open University undergraduate students in Wales join us without the standard university entry level qualifications and a quarter of current new entrants to the OU in Wales are from "low affluence" areas as defined by HEFCW. In</p>
--	--	--	--	--	--	--

						<p>support of a 'buoyant economy' and priority economic renewal areas, more than a third of all OU in Wales student study a STEM subject and 81% of all OU undergraduates work whilst studying, demonstrating that part-time distance learning can be the most convenient quality way of upskilling or reskilling, whilst also bearing in mind part-time undergraduate students' wider economic contributions through taxation. The OU's work with trades unions in Wales widens participation in learning, and in many instances</p>
--	--	--	--	--	--	---

						provides an initial engagement with higher education learning. The OU in Wales become the first university to receive a 'Quality Award' from the Wales TUC for its trades union learner engagement activities and work with UNISON, which has seen over 700 sponsored learners in three years, won the Times Higher Education UK Widening Participation Initiative of the Year in 2010.
<b>Cerys Furlong NIACE National Institute of Adult Continuing Education (NIACE) Dysgu</b>	In relation to fee plans, we hope that the Assembly Government will consider the commitment in For Our Future for 'greater opportunities for individuals to learn on a part time basis'.	No comment supplied.	No comment supplied.	No comment supplied.	No comment supplied.	We are concerned that failing to consider issues in relation to part time learners and learning now, while decisions are being made in relation to full

Cymru					<p>time undergraduate study, could result in unintended consequences, particularly in light of constraints on resources. In all its considerations we hope that the Assembly Government will consider that with a changing demographic (an ageing society) and a volatile economic climate where many face uncertainty in employment, the opportunity to re-train, up-skill and change careers is increasing in importance. For many adults, part time study is the only way to do this.</p>
-------	--	--	--	--	--

<p><b>Elaine Robinson /Debra Thorne NASMA - National Association of Student Money Advisors</b></p>	<p>The fee plans would in part express how the universities charging more than the basic fee rate aimed to put practical measures in place to increase access to higher education from underrepresented groups and further the aims of For Our Future. If they are to be effective, fee plans need to be explicit and offer specific guidance on what is expected and how outcomes will be measured. Will HEFCW have any power in relation to ensuring that fee plans are adhered to. Will there be timely monitoring of progress and how will progress be measured? We would like to see measures which include pre-entry aspiration raising work and more encouragement of contextual admissions to enable more representation of State educated students, Care Leavers and other low income groups, ensure adequate hardship funds and financial capability provision both pre and post entry. Hardship funding has been reduced significantly but childcare grants only offers 85% of costs up to a maximum amount. Could universities be encouraged via the fee plan to cover the 15% shortfall as a childcare grant or bursary? HEI</p>	<p>If the basic rate is lower than the proposed £6K there may be a number of issues. If lower, would there be a significant rise in applications from English applicants which would result in less places for Welsh domiciled students? If the basic fee rate was lower it would decrease student indebtedness but how would universities be funded to ensure that student experience and support is not detrimentally affected? This policy would need to ensure that government provided funding from the centre with less onus on the individual. If we are stating that the basic rate will match England we also need to actively manage and match fair access in a more rigorous way as</p>	<p>This needs to be as simple as possible. It is important that there are clear guidelines in advance of issues eg what happens when a student transfers/withdraws/ has an interruption to study/ has previous study?. To simplify, and ensure that financial complications are not a barrier to a student transferring to a more suitable course, common guidance and an agreed cross-HEI approach to fee liability would be preferable. We recommend that Registry and Finance Officers who deal with SFE/SLC on a daily basis as well as a student</p>	<p>NASMA is an organisation with over 500 professionals working in the field of student funding and collectively we are recognised as the leading authority on all matters relating to student advice and funding. We think it is essential that the Programme Delivery Board is also representative of the HE sector. Face to face consultation and communication is very useful eg road shows and regional stakeholder groups. Road shows enable a broad range of practitioners as well as other interested parties to attend and contribute. NASMA would be willing to consider helping with these if they are resourced appropriately. Given that we operate in all 4 UK regions and many NASMA</p>	<p>In terms of complexity – we would put in a plea for some stability and less year on year changes. The number of changes over the last decade has led to the possible co-existence of 5 or 6 different cohorts, requiring significant experience and expertise within student support at HEIs in order to ensure students are able to make informed choices and fully understand the financial implications of their decisions to, e.g, transfer, suspend or withdraw. Similarly,</p>	<p>Increase in preparation for study to remove barriers to learning and aspiration eg financial capability. This should be part of the curriculum and compulsory in schools and FE colleges. Students will then be able to make informed choices and enjoy and benefit from university if they arrive prepared. This would improve the academic outcome and student experience. These skills can also be helpful throughout with informed choice in life after HE. Consideration could be given to monthly payments of SL</p>
--	---	--	---	---	---	---

	<p>hardship funds could be established to support vulnerable group such as parents, care leavers, disabled students. Will the fee plans include measures for postgraduate and part-time students? E.g. If HEIs increase MA/MSc postgraduate fees in line with undergraduate fees can they also be encouraged to offer bursaries/scholarships to low income students to enable them to fund this area of further study which is often down to self funding or family help. Similarly, part-time students from low income backgrounds will need encouragement to study, especially if they are re-training and have previous study at HE level. Bursaries/scholarships to address this need would be helpful. Are there to be time limits on the plans eg will they cover a 3 or 5 year period? The new access agreements in England are to be reviewed annually so that that any issues can be identified early in the new scheme and guidance issued if appropriate. Will Wales be joining England and Northern Ireland in the new Key Information Strategy (KIS) work currently underway which also enables students to compare</p>	<p>proposed in England. If the basic rate is £6K how will this be justified if the actual costs of the providing the course is less than this? In addition, we are concerned that the £6K basic rate will be a disincentive to students from families who are debt averse. This is already clear from our experience answering queries from prospective students. We do need to get a positive message across about HE and affordability but debt aversion and fear of debt can create barriers to aspiration. The new fee grant is a positive contribution for Welsh domiciled students – we will need further clear guidance as soon as possible , including domicile criteria, entitlement when a student is repeating,</p>	<p>funding expert are included in the design of any new system. These staff have a detailed understanding of the reporting, billing and attendance record management. They would be able to offer ideas to ensure the design of any new system was fit for purpose. From a student support perspective we think that students need to understand what happens if they transfer etc.(cf SCOP guidance in 2006) Clear and timely IAG will be crucial. Students will start applying for 2012 course in the near future so timing is important. As</p>	<p>colleagues from England. Scotland and NI also advise and assist students domiciled in Wales briefings for these colleagues will be needed. Could there also be roadshows for colleges/schools, students and parents? If LAs are no longer operational there will be a significant gap in the IAG work needed to ensure that prospective students understand what financial support is available and enable them to make an informed choice. This is particularly important for students from non-traditional backgrounds and households with no experience of HE . Also, with regards to devising an administratively light fee grant system, utilising the knowledge and</p>	<p>significant experience and expertise is available within Local Authorities to utilise to ensure support, and correct information advice and guidance is given to prospective and current students, in particular students from non-traditional backgrounds, mature students and students with additional costs/needs, e.g. children/disabilities. Local authorities also undertake significant work liaising with schools and colleges and delivering talks/providing</p>	<p>to enable students to survive better financially?  We are concerned as a sector with ensuring students get IAG pre-entry and throughout their time in HE – we would like to ensure students receive a good service from agencies administering their loans and assessing their applications. They will have higher expectations on the back of greater investment so we need ensure IAG is fit for purpose. Many NASMA members are concerned about this potential loss of the LAs as the working relationship</p>
--	--	--	--	--	--	--

	<p>HEIs? Depending on the future plans for the Financial Contingency Fund, would WAG wish to require HEI's to ring fence a specific amount of money based on student numbers to provide adequate hardship funding for their students? This ring-fencing should also include adequate human resource to manage and administer the Fund effectively. If Fee Plans are to include incentives to widen access, this should include adequate resourcing to support such students fully. Students from non-traditional backgrounds utilise the services of Student Money Advisers at a much greater level than others. They need expert information, advice and guidance in order to ensure that their financial circumstances are not a barrier to higher education and to enable them to continue on the course once enrolled and avoid withdrawal. Student expectations will continue to rise, especially in the context of increased tuition fees. HEIs will need to ensure that they provide excellent student support services including finance and funding advice to meet this expectation and put in</p>	<p>and entitlement for those with previous HE study. This guidance is required early to ensure that HEI Advisers can answer queries from prospective students. Open days for 2012 will begin as early as April to July 2011 for most HEIs. Re part-time students – we know they should have access to fee loans but if courses are half the full undergraduate price this could be a disincentive especially to those who may be re-skilling after having a degree from years ago and may not be able to access a fee loan. This is not within the scope of this consultation but any fee rise may need to result in a review of current PCDLs. We do not know if the fee rises will place a burden on the NHS for Nursing</p>	<p>stated in Q2 many HEIs have open days well in advance. We are getting many queries about 2012 already. We would also recommend that students are clear about the fee loan figures they need to put on the PN and PR 1 forms. If students are not in attendance for any reason (including ill health) on Dec 1st the tuition fee loan is not activated. This leaves it up to each HEI's fee policy to determine whether they waive term one's fees, part waive them or charge the full amount. When the fees rise significantly this could create heavy burdens</p>	<p>operational expertise of HEI members of the already established HEI /SLC Communications Forum would be very useful. Many members have considerable experience of the previous fee grant system, and can articulate the significant issues that they encountered. Learning from this experience would help greatly in ensuring a reduction in complexity and cost.</p>	<p>information to their pupils. A centralised SLC based system would not provide this. It would therefore be highly beneficial to maintain this resource if existing experienced staff and expertise were kept within Wales rather than the proposed centralised SLC solution.</p> <p>Has the effectiveness and costs of the SFW call centre been reviewed? Could WAG save money by utilising instead the considerable</p>	<p>between HEI support staff and LA staff has been very successful in addressing the needs of students quickly and efficiently, with minimal distress to the student. It is very difficult to imagine how this could be achieved by a remote centralised system based outside of Wales with no system of ownership of applications. This is particularly detrimental for vulnerable students with additional needs, e.g. those with children, mature students, disabled students. All are more vulnerable to leaving the course if things go wrong with their assessment</p>
--	---	--	---	--	--	--

	<p>place appropriate levels of support staff to guarantee this. This should include a commitment to ensure an appropriate advice, guidance and counselling mechanism is in place for every case where a student wishes to repeat study/withdraw/suspend etc as such decisions will have serious financial circumstances. In the long term this investment can only improve retention and the student experience. Course costs for the duration of course should be made clear at start of course. What happens if the fees decrease at the HEI for future cohorts? Clear and transparent widening access targets should be detailed within the fee plans and HEI to clearly demonstrate how these will be met. Changing courses will be a minefield if different HEIs adopt different rules regarding fee liability. We suggest that HEFCW consider the requirement that HEIs sign up to a common approach to minimise financial barriers to changing unsuitable courses and enable students to make informed choices when transferring/changing courses.</p>	<p>degree and healthcare courses so some guidance on this would be appreciated.</p>	<p>on some vulnerable students who may not be allowed to re-enrol when they are due to return to study until they had cleared the fee debt accrued as a personal liability. The fee loan should be available at an earlier date. Another issue to consider is the point at which the new fee grant comes into operation ie will the loan pay the fees first and the new fee grant later? If HEFCW administered the fee grant scheme - could it be paid in one instalment? If so what month would it be paid? This is an area for consultation with HEIs. The advantages of</p>		<p>expertise already existing within Local Authorities to give prospective students and applicants more in depth information, advice and guidance regarding applying for funding and queries about assessments?</p> <p>Student Finance England are introducing changes to processes to gain efficiencies that aren't being introduced in Wales. For example, the non-means tested rollover and HMRC data share. Both should reduce the</p>	<p>as the stakes are higher in their personal lives. Swift resolution to problems, and a friendly face helping them with this at the HEI are very important.</p> <p>The need to ensure any IAG materials for 2012 are produced and validated by sector experts and are free from ambiguity and spin.</p>
--	---	---	--	--	--	--

			<p>using the SLC is that they have set up systems already but previous experience of administration of the old tuition fee grant has raised serious issues which need thorough exploration with relevant operational staff at HEIs in order to unpick and hopefully iron out these difficulties. One suggestion that could be considered to minimise the administrative burden on HEIs is reducing significantly the number of Change of Circumstances (CHOC) forms that are generated. Currently, if a student changes courses, but</p>		<p>administrative burden and turnaround time of applications. Perhaps SFW should be adopting these too.</p> <p>Re-doubling efforts to attain alignment with UCAS would lead to efficiencies.</p>	
--	--	--	--	--	--	--

			remains on the same year and on an eligible course, the HEI has to submit a CHOC form. The students' entitlement to support is not affected, therefore is this really necessary? Glamorgan alone has activated around 1000 CHOC's so far in 2010/11.			
<b>Sam McIlvogue Coleg Llandrillo Cymru</b>	<p>People associate price with quality, a higher value is placed on more expensive items or goods. Differentiation in fees may cause people to make a value judgement regarding the qualification and interpret higher tuition fees to mean academic excellence and a better student experience thus creating a quality benchmark based upon perception.</p> <p>Institutions should be allowed to agree their own fee structure to capitalise on areas of excellence.</p> <p>Higher fees and fee</p>	<p>Tuition Fees in Wales should not be set lower than England for the reasons stated in Q1.</p> <p>We would welcome more guidance on the fee structure for part time undergraduate studies. Guidance may suggest that HEIs use a pro rata model when setting the part time fees thus lessening the differential between</p>	<p>Any change to administration must not be detrimental to the cash flow of the HEI.</p> <p>Consideration should be given to the direct funded FEIs when developing the scheme.</p>	<p>Is the voice of FE and Employers adequately represented on the Board?</p> <p>Participation of and engagement with pupils in year 12 &amp; 13, parents, FE level 3 students and employers is important to ensure that all views are heard and represented.</p>	<p>Review the withdrawal procedures for undergraduates . Improve the general awareness of students regarding their responsibility for repaying any funding if they withdraw from their programme of study.</p> <p>In our</p>	<p>There is still misunderstanding amongst students in Wales about the differences between the Welsh and English HE fees scheme. This could have an unnecessary adverse impact on Welsh students HE aims. We would recommend a campaign to raise awareness and</p>

	<p>differentiation could also have a negative effect on collaboration and potentially damage the widening participation agenda. Therefore it would be a useful strategy to ensure those who want to charge higher fees have plans in place for widening access, as is planned in England.</p>	<p>part time and full time fees whilst also placing a real comparative value on the qualification.</p> <p>There is concern that as HEIs set part time fees using a pro rata model the cost of part time fees will increase quite substantially. A £6k tuition fee equates to a 10 credit module costing £500. This is a significant increase in the current level of part time fees for some bodies.</p> <p>We suggest that WAG should clearly define what is meant by 'intensity of study'. Current guidance refers to having an upper band of intensity set as 75% or more. This upper intensity band should have a ceiling e.g. 90% so that institutions can clearly communicate to prospective</p>			<p>experience, LEAs provide excellent information and advisory support services to students and institutions. Any changes in the administration of the scheme must continue to ensure effectiveness and efficiency.</p>	<p>understanding.</p>
--	---	--	--	--	---	-----------------------

		<p>students what is part time and what is full time.</p> <p>No mention has been made regarding the continuation of the part time Fee and Course Grant. What changes will be made to the financial support that is available to students? As fees are set to increase will WAG also increase the level of financial support available for part time undergraduate students? The PT Fee Grant needs to be proportionate to the PT Fees institutions may charge therefore WAG would need to increase the amount of support currently available.</p>				
<p><b>Mary Curnock Cook UCAS</b></p>	<p>Applicants to Welsh Universities come from a wide spread of geographical locations across the UK, Europe and the rest of the world. In the interests of</p>	<p>Discussions about possible fee rates should be informed by evidence on the application</p>	<p>No comment.</p>	<p>UCAS would wish to be consulted directly and involved in the relevant high level discussions around</p>	<p>UCAS is working with the Student Loans Company to</p>	<p>The consultation emphasises the importance of the new funding arrangements</p>

	<p>providing all learners with the widest range of potential HE options across the UK, it makes sense to maintain, as far as practicable, a level playing field in relation to outreach, access and widening participation activities. Therefore, although fee plans will reflect Welsh strategic priorities, it would also be desirable for the plans to take account of the principles underpinning access agreements for English institutions wishing to charge more than £6,000 per annum.</p> <p>In addition, it would be sensible for fee plans to build on existing institutional outreach, access and WP activities in Wales such as widening access premiums for Communities First areas, Reaching Wider partnerships, POLAR2 participation and Assembly Learning Grant for eligible students. Fee plans might also usefully include guidance on the provision of high-quality, consistent information about institutions and their course offerings.</p>	<p>behaviours of Welsh domiciled learners, and the behaviour of applicants applying to Welsh institutions.</p> <p>Wales is a net importer of students. UCAS end-of-year data for 2010 show that 30,686 applicants applied to study at Welsh institutions; of these the breakdown was: 15,927 (51.9%) Welsh domiciled 10,907 (35.5%) English domiciled 75 (0.2%) Scottish domiciled 203 (0.7%) NI domiciled 1,610 (5.2%) EU-other 1,964 (6.4%) international (non EU)</p> <p>Of these, accepted applicants, out of a total of 25,162, were: 12,178 (48.4%) Welsh domiciled 10,469 (41.6%) English domiciled</p>		<p>the process for the approval of fee plans by HEFCW, particularly any discussions about the process and timetable for the publication of tuition fees information (see question 6). We would also be willing to participate in any of the relevant workshops.</p>	<p>explore the scope for a single application portal which would allow learners to apply for higher education courses and student finance at the same time. This would give applicants a simpler and more efficient means to submit all of the information they need to apply to higher education and access student finance. UCAS would like to explore with the SLC and Student Finance Wales what opportunities they might be to better support Welsh domiciled</p>	<p>being in place for the 2012-13 academic year. We wish to draw attention to a number of issues around the timing of decisions and release of information on any new student finance arrangements in order to meet this challenging timetable.</p> <p>In many respects the entry cycle for admissions to universities and colleges in autumn 2012 is already underway. Potential applicants are starting to research higher education options and are looking for advice from a wide range of sources. In March UCAS will be running</p>
--	--	--	--	---	--	---

		<p>55 (0.2%) Scottish domiciled  169 (0.7%) NI domiciled  1,044 (4.1%) EU-other  1,247 (5.0%) international (non EU)</p> <p>Welsh domiciled applicants (total 24,908) applied to, and were accepted (total 18,671) by the following institutions:  15,927 (63.9%) applicants to Welsh institutions, 12,178 (65.2%) accepts  8,745 (35.1%) applicants to English institutions, 6,393 (34.2%) accepts  226 (0.9%) applicants to Scotland institutions, 92 (0.5%) accepts  10 (less than 0.1%) applicants to NI institutions, 8 (less than 0.1%) accepts</p> <p>UCAS would be happy to work with the Welsh Assembly</p>			<p>students and other studying in Wales.</p>	<p>conventions with schools and colleges across the UK to provide advice on how to apply. University open days typically start in April and run through to July, with many institutions already taking bookings.</p> <p>UCAS believes that it is desirable that learners applying to UK universities and colleges should have access to the full range of study options when considering which courses and institutions best meet their needs. Financial considerations are important part of this decision making process and we believe that it essential that all applicants</p>
--	--	--	--	--	--	---

		on any further data requirements.				<p>understand the financial commitments they are making before submitting their UCAS applications.</p> <p>In view of the current uncertainty around course offerings and fee levels across the UK, UCAS is delaying the collection and publication of course information which will now go live in May 2011. Applicants will be able to register with UCAS from June, and will be able to submit their applications from September 2011. The deadline for applications for medicine, dentistry and veterinary science courses,</p>
--	--	-----------------------------------	--	--	--	--

						<p>as well as for applications to the Universities of Oxford and Cambridge, is 15th October 2011. The deadline for the majority of other courses is 15th January 2012.</p> <p>English institutions wishing to charge tuition fees of more than £6,000 per annum will need to prepare new access agreements which will have to be approved by the Office for Fair Access (OFFA). UCAS is working with OFFA to determine when tuition fee information about courses at English institutions starting in 2012 will be available to applicants. We</p>
--	--	--	--	--	--	--

						<p>anticipate that this will be in early July 2011.</p> <p>In the interests of fairness to Welsh domiciled applicants and to help maintain the institutional competitiveness of Welsh institutions, it would highly desirable if Welsh institutions were in a position to publish their approved tuition fees for individual courses at the same time as institutions in other parts of the country. This would require HEFCW approval of the proposed fee plans by the end of June 2011.</p> <p>UCAS is willing to work with the Welsh Assembly and HEFCW to help deliver</p>
--	--	--	--	--	--	--

						whatever new student finance arrangements are agreed, in order to support Welsh learners and to enable Welsh universities and colleges to achieve fair, transparent and efficient admissions to higher education 2012.
<b>Oona Stannard Catholic Education Service for England and Wales</b>	Fee plans could reasonably make allowance for measures to charge lower or different fees for provision specifically meeting specific Welsh needs alongside For Our Future priorities. Fee planning guidance will have to have regard to part time students and their needs and further attention should be given to this and why they are part time when fee provisions are set eg where students are part time because they are carers and therefore already carrying additional burdens/helping society, could they have some extra protection in fees structure.	To set basic fee level below that of England would be challenging but offer some opportunities as well as constraints. Firstly, could Wales afford to do this and would it suggest an inferior product? If Welsh higher education cannot meet the same spread of provision as England would it be divisive to have some provision that students can access more cheaply in Wales when other	Whatever scheme is designed to enable the funding to follow the student ref 6.c it should be transparent to all parties. With an identification system for students it should be possible for all parties to electronically monitor payments made and received thus easing	No comment	No comment supplied.	No comment supplied.

		<p>students will have to leave the Country to follow their study pathway? Conversely, would a lower fee help to keep Welsh talent in Wales?</p>	<p>bureaucratic burdens.</p>			
<p><b>John Graystone Colegau Cymru</b></p>	<p>Introductory comment NB Currently 18 FE colleges deliver HE courses, enrolling around 7,500 students annually. Many of these are taking courses franchised from local higher education institutions (HEIs). Six colleges receive direct funding from HEFCW. FE colleges make a significant contribution to the future direction of higher education in Wales. Around 80% of HE students at FE colleges attend on a part-time basis. Most study vocational/professional qualifications. Current fee plans require all institutions to commit to widening participation targets. Further education institutions (FEIs) strongly support this requirement and are well placed to meet local needs. ColegauCymru supports the principle that institutions wishing to set tuition fees above the</p>	<p>In terms of simplicity and administrative convenience there would be advantage in setting a basic fee rate of £6,000 in line with England. However, in relation to the widening participation aspirations of the Welsh Assembly Government, some consideration might be given to differentiated basic fee rates for students following HE programmes in FEIs. Most HE in FE provision in Wales is delivered under franchise arrangements between HEI and partner FEIs. There is considerable</p>	<p>ColegauCymru would welcome efforts to produce a simple, non-bureaucratic fee grant scheme for Wales. The proposed scheme appears to be simple and straight forward. FEIs offering HE programmes will need to be consulted as part of any future discussions designed to minimise the administrative burden of new arrangements for funding and student finance. Any change to administration must not be</p>	<p>Draft written proposals circulated to all institutions delivering HE programmes in Wales and to all interested stakeholders with a reasonable timeframe for responses. Regional meetings providing opportunities for face-to face contact and open and transparent discussions. Stakeholder workshops to consider arrangements for supporting part-time learning in Wales as proposed by the Minister in his Foreword to the consultation document.</p>	<p>Centralisation of the processing of applications along the lines adopted in England might improve the access of students to up-to-date information and to supporting bodies. Review the withdrawal procedures for undergraduates . Improve the general awareness of students regarding their responsibility for repaying any funding if they withdraw from their</p>	<p>In summary: The standardisation of franchising arrangements especially in relation to funding arrangements. Consideration of differentiation of basic fee rates Separate and clear guidance on funding arrangements for part-time students. Finally, there is misunderstanding amongst students in Wales about the differences between the different fee schemes in Wales and England. This</p>

	<p>basic fee rate will be required to submit fee plans for approval by HEFCW. In addition ColegauCymru is mindful of the recent Ministerial announcement that access to the new fee regime will be dependent on the willingness of institutions to play a part in the reconfiguration of higher education in Wales.</p> <p>It is unlikely that any FEIs offering HE in FE will wish to set tuition fees above the basic rate fee.</p> <p>Any institution intending to charge above the basic rate fee should be required to set out clearly the additional student entitlement. This should involve clear identification of what students might expect over and above the norm for the extra fee.</p> <p>As noted above, 80% of students following HE programmes in FEIs study part-time. The fee planning guidance should provide clear and detailed guidance on part-time student fees with clear specification of their entitlements.</p> <p>In line with current practices, institutions will need to set out the financial assistance that will be available to students, for example, in the form of bursaries.</p>	<p>variation, within a band of some 30% - 60%, in the proportion of the fee grant retained/top-sliced by the franchising HEI. Some colleges have experienced a situation where 30% of the fee grant has been retained by the franchising HEI in addition to 30% of the funding received from HEFCW.</p> <p>ColegauCymru is strongly of the view that the fee needs to be with the provider and directly related to the delivery of learning and the provision of front line services such as development costs and quality assurance. FEIs have established a reputation for the provision of high quality HE provision (evidenced in recent NSS outcomes and in assessments undertaken by the</p>	<p>detrimental to the cash flow of the HEI.</p> <p>Consideration should be given to the direct funded FEIs when developing the scheme.</p>	<p>FEIs and employers need to have adequate representation on the Board.</p> <p>Participation of and engagement with pupils in year 12 &amp; 13, parents, FE level 3 students and employers are important to ensure that all views are heard and represented.</p>	<p>programme of study. LEAs provide excellent information and advisory support services to students and institutions. Any changes in the administration of the scheme must continue to ensure effectiveness and efficiency.</p>	<p>could have an unnecessary adverse impact on Welsh students' HE aims. We would recommend a campaign to raise awareness and understanding.</p>
--	---	--	--	---	---	---

	<p>People associate price with quality, a higher value is placed on more expensive items or goods. There is a risk that differentiation in fees may cause people to make a value judgement regarding the qualification and interpret higher tuition fees to mean academic excellence and a better student experience thus creating a quality benchmark based upon perception.</p> <p>Institutions should be allowed to agree their own fee structure to capitalise on areas of excellence.</p> <p>Higher fees and fee differentiation could also have a negative effect on collaboration and potentially damage the widening participation agenda. Therefore it would be a useful strategy to ensure those who want to charge higher fees have plans in place for widening access, as is planned in England.</p>	<p>Quality Assurance Agency for Higher Education).</p> <p>Consideration needs to be given to standardising the amount HEIs are allowed to retain/top-slice.</p> <p>Tuition Fees in Wales should not be set lower than England for the reasons stated in Q1.</p> <p>We would welcome more guidance on the fee structure for part time undergraduate studies. Guidance may suggest that HEIs use a pro rata model when setting the part time fees thus lessening the differential between part time and full time fees whilst also placing a real comparative value on the qualification.</p> <p>There is concern that as HEIs set part time fees using a pro rata model the cost of part time fees will increase quite</p>				
--	--	---	--	--	--	--

		<p>substantially. A £6k tuition fee equates to a 10 credit module costing £500. This is a significant increase in the current level of part time fees for some bodies.</p> <p>We suggest that WAG should clearly define what is meant by 'intensity of study'. Current guidance refers to having an upper band of intensity set as 75% or more. This upper intensity band should have a ceiling e.g. 90% so that institutions can clearly communicate to prospective students what is part time and what is full time.</p> <p>No mention has been made regarding the continuation of the part time fee and course grant. What changes will be made to the financial support that is available to students? As fees are set to</p>				
--	--	---	--	--	--	--

		increase will WAG also increase the level of financial support available for part time undergraduate students? The PT fee grant needs to be proportionate to the PT fees institutions may charge therefore WAG would need to increase the amount of support currently available.				
<b>Rebecca Williams Undeb Cenedlaetho I Athrawon Cymru (UCAC)</b>	Deallwn mai ehangu mynediad a symud ymlaen gyda'r agenda rhanbartholi ac ail-gyflunio bydd yr amodau ar gyfer codi ffioedd ar lefel uwch. Mae hwyluso astudio trwy gyfrwng y Gymraeg 'mewn amrywiaeth ehangach o raglenni a lleoliadau' yn un o amcanion 'Er Mwyn Ein Dyfodol'. Awgrymwn felly ei bod hi'n briodol i wneud darpariaeth cyfrwng Cymraeg yn amod i godi ffioedd uwch. Gallai'r amod gael ei fynegi fel: - nifer neu ganran o gyrsiau/modiwlau cyfrwng Cymraeg, mewn isafswm o feysydd gwahanol - nifer neu ganran o fyfyrwyr sy'n	O ran myfyrwyr o Gymru, hyd y gwelwn ni, nid yw'n gwneud gwahaniaeth am fod Llywodraeth y Cynulliad yn talu unrhyw beth dros yr hyn sy'n cyfateb â £3,375. Yr hyn sy'n bwysig yw sicrhau bod digon o fyfyrwyr o Loegr yn dod i brifysgolion Cymru er mwyn sybsideiddio'r system Addysg Uwch. Felly mae'r cwestiwn o fantais/anfantais yn dibynnu ar y cwestiwn hwn: A oes	Dim sylw.	Byddai gweithdai/cyfarfodydd ymgynghori (torfol neu gyda mudiadau/sefydliadau unigol) yn bosib, neu ymgynghoriadau pellach ar bapur/arlein.	Dim sylw.	Teimlwn fod rhaid codi'r cwestiwn ynglŷn ag ariannu myfyrwyr o Gymru sy'n astudio tu allan i Gymru. Deallwn yr ymdeimlad o 'gyfrifoldeb i fyfyrwyr sydd fel rheol yn byw yng Nghymru', ond rhaid gofyn y cwestiwn, a rhaid ystyried yr opsiynau. Mae'n glir, o dan y cynlluniau presennol, y byddai swm

	<p>dilyn cyrsiau/modiwlau cyfrwng Cymraeg</p> <p>Byddai'r ail ffordd o fynegi'r amod yn fanteisiol am y byddai'n rhoi cymhelliad i Brifysgolion annog myfyrwyr i ddilyn cyrsiau cyfrwng Cymraeg, yn ogystal â'u cynnig yn y lle cyntaf.</p>	<p>rhagdybiaeth y bydd digonedd neu brinder myfyrwyr am ddod o Loegr i brifysgolion Cymru? A oes angen gwneud rhywbeth ychwanegol i'w denu i Gymru - ai peidio?</p> <p>Manteision</p> <ul style="list-style-type: none"> <li>- Gallai ddenu mwy o fyfyrwyr o Loegr a thu hwnt i brifysgolion Cymru</li> <li>- Byddai modd cael ffi sylfaenol is, a chadw'r gofynion o ran graddau Lefel A ac ati yn uchel am fod galw a chystadleuaeth am lefydd</li> </ul> <p>Anfanteision</p> <ul style="list-style-type: none"> <li>- Gallai greu problemau ariannol i brifysgolion Cymru, gan eu gadael heb ddigon o gyllid i lenwi'r bwch ar ôl torri (top-slice) grant dysgu'r Prifysgolion</li> <li>- Gallai ddibrisio graddau prifysgolion Cymru o ran canfyddiad myfyrwyr o'u gwerth; gallant edrych fel graddau</li> </ul>			<p>sylweddol o arian Llywodraeth Cynulliad Cymru yn dilyn myfyrwyr o Gymru sy'n dewis astudio mewn prifysgol yn Lloegr, er enghraifft.</p> <p>Byddai'r swm hwnnw'n sybsideiddio prifysgolion tu allan i Gymru, ac yn annog myfyrwyr i adael Cymru i fynd i'r brifysgol. Y tebygolrwydd yw na fydd y rhan fwyaf ohonynt yn dychwelyd i Gymru wedyn i weithio, magu teuluoedd, cyfrannu i'r economi ac ati.</p> <p>Byddai Llywodraeth Cynulliad Cymru'n chwarae ei rhan ym mharhad y llif o dalent ifanc allan o'r wlad sydd wedi bod yn</p>
--	---	--	--	--	--

		'rhad'				<p>gymaint o broblem i Gymru dros y blynyddoedd. Gallwn weld dadl dros ariannu myfyrwyr sy'n gadael Cymru ble nad oes cwrs ar gael yng Nghymru sy'n cyfateb â'u dewis pwnc; milfeddygaeth yw'r enghraifft amlwg. Ond tu hwnt i'r pynciau cyfyngedig iawn hynny, nid yw UCAC wedi'i ddarbwylo o'r gwerth i Gymru – ei heconomi, na'i sector Addysg Uwch – o dalu ffioedd myfyrwyr sy'n mynd i'r brifysgol yn rhywle arall. Mae gan Gymru berffaith hawl i gynnig cymhelliad i'w myfyrwyr i astudio yng Nghymru – neu o leiaf i beidio â</p>
--	--	--------	--	--	--	--

						chynnig cymhelliad i adael.
<b>Adam Rees NUS</b>	<p>Within a number of statements and speeches, the Minister for Children, Education and Lifelong Learning has spoken of his intention to link For Our Future priorities to the ability of Welsh higher education institutions to charge higher tuition fees. In particular, he has made several references to the reconfiguration agenda and to widening access.</p> <p>NUS Wales broadly welcomes the move to place conditions on institutions with regards to their ability to charge higher tuition fees. It must not be the case the institutions are 'automatically' or 'easily' allowed to charge fees at a higher level than they do now. However, we believe that this should be focussed on particular For Our Future priorities more than others. NUS Wales also believes that the process associated with these conditions and subsequent regulation should be robust and challenging to institutions, and must not be a simple 'tick box' exercise. Although the Minister</p>	<p>NUS Wales does not believe that higher education institutions have done anything to 'deserve' the automatic right to charge above the current rate, As a result, we would suggest that the basic tuition fee rate should be at the current maximum rate of £3,375 rather than at £6,000 per annum. Since the last increase in tuition fees to £3,000 per year, we have seen no evidence that there has been any improvement in the student experience, In fact, in both England and in Wales student satisfaction dropped slightly as the new tuition fee regime</p>	<p>NUS Wales believes that the administration of the tuition fee waiver / grant should be as simple and efficient as possible, in order to ensure that students, institutions and the government feel that they have full confidence in the process. It should also be as cost effective as possible, ensuring that the maximum amount of funding reaches students and institutions, rather than being spent on administrative systems. If this function were to be</p>	<p>NUS Wales understands that the Programme Delivery Board deliberately consists of delivery partners, rather than stakeholder groups. However, if institutions were to gain representation on this body through Higher Education Wales - as a stakeholder making representations on the development of his policy - then we would insist that students should also be represented through NUS Wales. If, however, the membership of the Programme Delivery Board remains the same, NUS Wales would urge DCELLS to ensure that there is an opportunity to consult further with student</p>	No comment	<p>NUS Wales has significant concerns about the timescale for this policy to be implemented. Although we recognise that this process has been somewhat forced by events in England, we are extremely worried that the system for regulating the ability of higher education institutions to charge higher tuition fees will fail to be as robust as it should be. The tripling of the maximum level of tuition fees is a significant change to the higher education landscape. It</p>

	<p>has stated his intention to link institutions' ability to charge higher tuition fees to the reconfiguration agenda, this is not something that NUS Wales can support. We understand the Welsh Assembly Government's plan for reconfiguration, and have been broadly supportive of its aims over the past year. We cannot however support a system that effectively uses differing levels of graduate debt as an incentive for institutions to engage with this agenda. We recognise that the Welsh Assembly Government, through its remit letter to HEFCW, has used government funding to incentivise engagement with and delivery of government priorities such as reconfiguration. However, NUS Wales does not believe that students' money should be used to deliver a government priority such as this. We fail to see how this strategy could be adequately justified to graduates who could leave university with different amounts of debt, depending on their institutions' willingness or ability to engage with the reconfiguration agenda. If the government wishes to deliver the reconfiguration</p>	<p>was introduced, The National Student Survey 2010 surveyed the first cohort of students in Wales to have been charged £3,000 per year tuition fees. The results for 'overall satisfaction with the quality of the course' dropped by one percentage point across Wales. Although this is not a significant reduction in statistical terms, we would have expected an increase in satisfaction in line with expectations that higher tuition fees would have been channelled into improving the student experience. There is no evidence that students have received any benefit from the last increase in tuition fees, in fact they have simply seen their graduate debt increase. As a result, we do not believe that any</p>	<p>administered through the Student Loan Company, then steps should be taken to ensure that students feel confident in this function and are assured that they will not encounter similar problems to those faced by English students in receipt of maintenance loans during the 2009/10 academic year.</p>	<p>representatives from a variety of institutions across Wales; NUS Wales is happy to facilitate such a meeting. The scale of the changes to higher education funding and the timeframe within which these changes are to be determined and implemented is far from ideal. NUS Wales urges DCELLS to ensure maximum consultation with stakeholder groups in order to limit opportunity for unintended consequences.</p>	<p>completely contradicts the Minister's statement in October that 'The One Wales government does not believe in full-cost or near full-cost fees' and will leave students / graduates with up to £27,000 in debt from tuition fees alone. As previously stated, the system for regulating institutions' ability to charge higher fees should not be a simple tick box exercise. It should not be 'easy' for institutions to charge above the basic rate, We are extremely are concerned that the timescale for this policy to be determined and implemented may lead to a less</p>
--	--	---	---	---	---

	<p>agenda, then it is well within its rights to instruct HEFCW to utilise public funding strategically in order to achieve this objective. However, we believe that the government should not use tuition fees and student debt as a threat or incentive for institutions to engage with this issue.</p> <p>As the proposals for fee plans concern the ability of institutions to charge increased undergraduate tuition fees, we believe that they should not include requirements based on national research priorities. Although we recognise that research can often compliment teaching within a university, we believe that any action required for an institution to be allowed to charge higher tuition fees must be more directly linked to access to higher education and to the undergraduate learning and teaching experience, rather than the institution's research profile. The proposed increase in tuition fees will leave students with up to £27,000 of debt from tuition fees alone. The decision to triple tuition fees will affect students and graduates, and regulation must be based on this</p>	<p>institution should automatically be able to charge above the current level of £3,375.</p> <p>NUS Wales also has concerns that if set at £6,000, some institutions may choose to charge this basic rate instead of having to take steps to address the issues within the fee plan framework, such as widening access. We believe that any increase in the level of tuition fees should require firm commitments to widening access and the student experience. We believe that doubling the level of tuition fees with no requirement for such commitments would be detrimental to the widening access agenda, effectively allowing institutions to double their fees without tackling the impact on widening</p>				<p>robust system and we would urge DCELLS to ensure that this is not the case.</p>
--	---	---	--	--	--	--

	<p>assumption. It is therefore our opinion that tuition fee plans and the ability to charge fees above the current level must be based on two themes.</p> <p><b>Widening access</b> – Research conducted in 2010 by the Sutton Trust showed that significant numbers of students would be deterred from entering higher education if tuition fees were to be increased. The research<sup>1</sup> also showed that those from the poorest backgrounds were more likely to be deterred. It is our view that any ability to charge higher tuition fees must be based on institutions demonstrating a serious commitment to widening access, as well as meeting hard targets associated with this issue.</p> <p><b>Student experience</b> – NUS Wales believes that if students are to pay up to £9,000 per year for higher education, then they should expect a significantly better return. As the financial burden of higher education is being shifted onto the students more than ever before, institutions must be able to deliver an excellent student experience. As the government</p>	<p>access. This point also applies to the student experience. If institutions are able to increase tuition fees to any level above the current rate, they must be able to demonstrate the actions they will take that will benefit the student experience.</p>				
--	---	--	--	--	--	--

	<p>is aware, we represent both Welsh domiciled and non-Welsh domiciled students studying at Welsh institutions. Although Welsh domiciled students will initially be protected from the increase in tuition fees, we have no guarantee that this policy will continue in the long term. As a result, we will be basing our representation on the assumption that this policy is a temporary measure that will be implemented within a more permanent framework of higher tuition fee levels. We are fully aware that the tuition fee waiver may not continue beyond a certain timeframe and therefore feel that the below representations are valid for both Welsh domiciled and non-Welsh domiciled students of the future. However, while the fee waiver system exists, Welsh domiciled students will have the same demands as their non-Welsh counterparts, as they have a choice to take their fees to an English institution, rather than a Welsh institution.</p> <p><b>Widening Access and Retention</b></p> <p>The aim of opening out higher education to groups in society</p>					
--	--	--	--	--	--	--

	<p>that are not well represented continues to be hugely important. It is a matter of fairness and also a matter of leadership: while higher education cannot correct all of society's ills, it should play a central role in advocating for social change and innovating in practical developments to support that aim.</p> <p>Although fee plans have been used since the introduction of variable tuition fees in Wales, we believe that the new system must reflect the significant change to the funding of higher education. Fee plans should be scrutinised and monitored more vigorously, with a greater emphasis on outcomes rather than outputs. The focus of fee plans must move away from a simple description of the activities an institution will undertake to attempt to widen access. NUSW believes that fee plans should require monitoring of widening access initiatives against hard targets on recruitment, retention and achievement, thus contributing to the national ambition of increasing the number of students from disadvantaged backgrounds in Welsh higher</p>					
--	--	--	--	--	--	--

	<p>education. In order for the process to be as open and transparent as possible, NUS Wales should be represented on the body that determines whether fee plans are acceptable. There should also be a requirement for the provider to formally consult the students' union when developing their fee plan. Tuition fee plans should be monitored regularly to ensure that a provider is meeting its targets. We would suggest that there is annual monitoring of the fee plans and associated targets, and therefore an annual review of whether an institution should be allowed to charge above the basic tuition fee level. As stated previously, we believe that the ability to charge higher tuition fees should be dependent on an institutions' commitment to widening access and their ability to deliver on associated targets. It is also crucial that providers are judged on admissions and retention of people from disadvantaged backgrounds, not simply on applications. NUS Wales believes that these targets should be ambitious. Any institution which does not show adequate ambition should be</p>					
--	---	--	--	--	--	--

	<p>refused the ability to charge higher tuition fees. We also believe that those with further to travel must do more – those institutions who have failed to adequately deliver on widening access in the past should demonstrate a strong commitment to changing their behaviour and delivering suitable outcomes. NUS Wales believes that there is little point in having a fee plan system if it becomes a simple ‘tick-box’ exercise. We believe that the government and HEFCW should make it clear that an institution’s ability to charge higher tuition fees will be withdrawn if the institution does not meet the widening access targets outlined in their fee plan. However, institutions must not be allowed to set feeble targets in order to mitigate the risk of failing to achieve them.</p> <p>NUS Wales has concerns that the short timescale for implementing this policy could lead to a less rigorous system being introduced. The lack of time should not be an excuse for allowing a weak fee plan system to exist. Students are going to be charged up to triple the amount of tuition fees than those within</p>					
--	---	--	--	--	--	--

	<p>the current system, and any fee plan system must reflect the severity and significance of this change. As well as monitoring and responding to widening access targets, institutions should also show a commitment to providing academic, financial and welfare support for students. It is essential that students, who could be paying up to £9,000 per year, have access to high quality academic and welfare support services on campus. There can no longer be any excuses for allowing students to drop out of higher education due to lack of academic and welfare support. As students build up over £27,000 in tuition fee debt, institutions have a duty to make every effort to ensure that a student can complete their chosen course and achieve success. Institutions must demonstrate a commitment to investing in these services, rather than cutting student support, as we have seen in institutions across Wales in recent times.</p> <p>Research has shown that those from the poorest backgrounds are more likely to be deterred by higher tuition fees. Maintenance</p>					
--	--	--	--	--	--	--

	<p>Grants have been frozen, yet cost of living has increased, and many students' unions have reported that halls of residence fees are often more expensive than the total maintenance loan on offer to students. In light of tuition fee debt potentially tripling, many students may take on extra part time jobs in order to reduce their total debt on graduation. In addition to this, the Financial Contingency Fund in higher education has been cut by 60%, preventing many students from accessing much needed hardship funding during their time at university. The UK government has announced a National Scholarship Scheme to support widening access. NUS Wales believes that the Welsh Assembly Government should also look to allocate funding towards supporting access from disadvantaged backgrounds. Although the bursary system associated with the introduction of variable tuition fees had many flaws, we believe that institutions should also allocate resources from tuition fee income to financially support students from disadvantaged and non-traditional backgrounds. We believe that institutions should</p>					
--	--	--	--	--	--	--

	<p>demonstrate within their tuition fee plans how they are going to provide academic, financial and welfare support for students. If they do not demonstrate an adequate commitment to funding student support, they should not have the ability to charge higher tuition fees.</p> <p><b>Student Experience</b>  Under the new tuition fee regimes, where students will be charged up to £9,000 per year NUSW believes that institutions should be required to produce accurate and detailed information for potential and current students, as well as taking significant steps to ensure an excellent student experience. This should be detailed within fee plans and any failure to deliver on this should mean that the institution concerned is not allowed to charge higher tuition fees.</p> <p>Centrality of the student voice  The new funding arrangements mean that the principal source of funding for higher education becomes the individual, who studies a course and then pays back the costs of providing that course over time. This must imply a far more powerful role for the voice of students within</p>					
--	---	--	--	--	--	--

	<p>providers, influencing the way that learning and teaching takes place and how other services are provided. The starting principle for the sector must be to ensure that students' unions are well funded and supported by their institution. In recent years we have seen students' union 'block grants' being cut and the ability of students' unions to provide representation and advice for students being seriously compromised by their institution's decision to reduce students' union funding. Student officers must have the financial support they need to provide effective student representation, especially as students begin to pay up to £9,000 per year in tuition fees. Institutions must show a commitment to adequately funding their students' unions. Any failure to do this should lead to the ability of the institution to charge higher tuition fees being withdrawn. Students should be well represented at every level of the institution and there should be at least two student representatives on the institution's governing body. The introduction of the 'Annual Statements', as outlined in the QAA Institutional Review</p>					
--	--	--	--	--	--	--

	<p>handbook, should become funded by institutions and developed to ensure that students' unions have the resources to research and analyse aspects of the student experience. In particular, there should be greater commitment to improving assessment and feedback. Fee plans should demonstrate the steps providers are taking to fund and support the students' union and engage with the student voice at every level of the institution.</p> <p>information for students and applicants In this new market landscape there must be a huge push for improved information for students. The National Student Survey has been a hugely important tool for monitoring student satisfaction; it should continue and be extended. Some additional work is well underway in England, with the development of the Key Information Set (KIS), which will give comparable information about all programmes in England. NUS Wales believes that Welsh institutions should have to provide information to at least the same level as English providers. The Key Information Set should include details of</p>					
--	---	--	--	--	--	--

	<p>contact time and an indication of which types of staff will be involved. Prospectuses used to be dull and detailed; they are now glossy brochures, which can be very useful in some ways but are largely useless for really understanding the structure, content or methods used on a given programme. We propose that full programme specifications and course outlines should be available for every programme offered, and provided accessibly through organisations' websites. No programme should be advertised without detailed information. Lack of information about the learning schedule (especially the timetable) can present a significant barrier to part-time students and to those with caring responsibilities. We believe that for every programme offered, a provisional timetable should be published for the first term or semester at the point the application round opens. We also believe that comprehensive induction plans should exist for all new students. Future earnings should not be the primary driver for people to study in higher education, but they are important and accurate data should be</p>					
--	--	--	--	--	--	--

	<p>available to applicants. A graduate earnings report for each higher education organisation, and for different subject groups should be released, derived from the repayment profiles of former students who are repaying their loans. This would be a huge advance on sampled earnings research at six months post completion. Higher education providers should be required to write to all its registered students each year with a full breakdown of their expenditure apportioned in relation to income from their fees. This would ensure transparency about how student fee income is actually spent and becomes of very great importance in an environment where fee income makes up the bulk of higher education resources. NUS Wales believes that regulations should be issued to organisations with regards to what charges additional to the main fee are permissible and impermissible. For example, it may specify that increases to accommodation costs be held to a certain level, that bench fees in science subjects be blocked, or even that every student be given a minimum number of printing</p>					
--	--	--	--	--	--	--

	<p>credits included in the main fee. In an environment where students are paying up to £9,000 per year in tuition fees, NUS Wales believes that there should be no 'hidden costs of study' in higher education. Institutions who wish to charge above the basic level of tuition fees should state in their fee plans that they will not charge students any additional mandatory course costs such as:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Fees;</li> <li><input type="checkbox"/> Materials for art degrees, such as canvasses, paints, clays, textiles, metals, etc;</li> <li><input type="checkbox"/> Materials to support health courses, eg, stethoscopes, optometry lens sets, lab coats;</li> <li><input type="checkbox"/> Outdoor equipment, eg, waterproof clothing; hiking boots, waterproof notebooks, hard hats, sports equipment;</li> <li><input type="checkbox"/> Learning resources, including books, journals, photocopying etc;</li> <li><input type="checkbox"/> Criminal Records Bureau (CRB) checks/ Independent Safeguarding Authority registration;</li> <li><input type="checkbox"/> Study visits/field courses: outdoor field courses, museums, events, galleries, theatres, film festivals, youth and community</li> </ul>					
--	---	--	--	--	--	--

	<p>projects, construction or engineering sites, prisons;</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Conferences and registration;</li> <li><input type="checkbox"/> Costs of additional facilities, eg, studio fees, laboratories, darkrooms, workshops;</li> <li><input type="checkbox"/> Printing, and binding costs</li> <li><input type="checkbox"/> Health checks, vaccinations for fitness to practice, study or travel;</li> <li><input type="checkbox"/> Work placement costs</li> <li><input type="checkbox"/> Coaching awards.</li> </ul> <p>At the very least, any institution wishing to charge above the current tuition fee of £3,375 should be required to detail all additional costs of study on their websites, at both institutional and course levels.</p> <p>Student Charters</p> <p>As students start to pay up to £9,000 per year, there will be increased pressure for HEIs to be clear about the student experience that they provide. We believe that the time is right for all HEIs and Students' Unions to review the top level information and commitments which they provide to students – as detailed in Student Charters and similar agreements.</p> <p>By investing time now, they will help current students to make the most of their time in higher</p>					
--	--	--	--	--	--	--

	<p>education and also begin to establish mechanisms for updating and refreshing their charters on a regular basis. In short, we consider that, if charters are: kept up to date through regular review, jointly owned by the HEI and the Students' Union, written concisely with clear links to detailed information, clearly communicated to all staff and all students, then they can be: important communication tools for HEIs to establish clear mutual expectations, help monitor the student experience and how relationships are working. NUS Wales believes that such a process should be a requirement set out in the fee plans of institutions wishing to charge above the basic tuition fee level. Student charters should be short, clear statements - of student rights and responsibilities - so students know broadly what they should be able to expect, what is required of them, and what to do if things do not meet expected standards. There should be clarity and consistency throughout the institution, across all subject areas. Student charters should provide a focus</p>					
--	--	--	--	--	--	--

	<p>for regular engagement and review with student representatives – to consider alongside other feedback from students and internal quality assurance and management information. We believe that student charters should be based on the following principles:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> This is a joint venture with the students’ union – must involve students and student reps at outset.</li> <li><input type="checkbox"/> Partnership working must continue after development – with joint monitoring and review.</li> <li><input type="checkbox"/> Review regularly – at least annually - with SU and use other evidence and feedback e.g. student surveys.</li> <li><input type="checkbox"/> Senior staff buy in at strategic committee – e.g. Learning and Teaching – and Vice Chancellor to sign off (together with students’ union president).</li> <li><input type="checkbox"/> Communication and dissemination needs careful thought – to reach all students (and staff)</li> <li><input type="checkbox"/> For all staff - engage and involve all student facing staff</li> <li><input type="checkbox"/> For all students – ensure that it covers both undergraduate and postgraduate (and is also relevant</li> </ul>					
--	--	--	--	--	--	--

	<ul style="list-style-type: none"> <li>□ Main focus is current students – for induction and during their time in higher education</li> <li>□ Be clear on purpose - charter is a front page – which links included to more detailed information in university regulations and course handbooks.</li> <li>□ Be clear what a charter is not – not a detailed personal agreement or contract.</li> <li>□ A charter also communicates the ethos of the institution</li> <li>□ And emphasises that students need to work in partnership with academic staff (and other students)</li> </ul> <p><b>Conclusion</b>  As previously stated, NUS Wales believes that the introduction of a £9,000 cap on tuition fees has the greatest impact on students. As a result, any ability to charge above the current level must be based on an institution’s commitment to widening access and the student experience. Fee plans must be robust; they must require hard, ambitious targets; and most importantly they must be heavily scrutinised and monitored to ensure that the ability to charge above the current level is not ‘easily’ or</p>					
--	---	--	--	--	--	--

	'automatically' awarded to institutions in Wales.					
--	---	--	--	--	--	--

## **ANNEX 3: Stakeholder Workshop Feedback**

### **TABLE 1 FEEDBACK**

#### **Morning session**

##### **Q2 Basic Fee Rate**

- Willingness on the part of HEIs to progress to swift merger is a potential obstacle to the Minister's aim of pushing through the changes.
- Clarity was called for on differential charging on fee levels within institutions.
- Setting fees at the £6k was perceived as being simpler and less bureaucratic, but wouldn't secure the Minister's policy objectives if all HEIs were able to charge this straight away.
- There was a need to set the basic fee rate at a level which suited the bulk of HEIs, while also allowing the Minister to achieve his policy objectives.
- HEIs could make a case to 'survive' at £6k, but not at £3.4k. However, £6k was viewed as a marginal level of fee income as regards financial viability.
- Overall support for a fee plan requirement set at the £3.4k level.
- The timetable for introducing fee plans was unrealistic.
- Setting the basic fee rate at a lower level would possibly lead to more English domiciled students coming to Welsh HEIs. There was a tension between catering for the local Welsh student population and incoming English domiciled students – potentially competing markets. This was a particular issue for those HEIs which had higher levels of English domiciled students.
- Lower level fees might lead to perceptions amongst students that the provision in question was of a lower quality.
- Higher fee levels would cause English students to consider more carefully the quality of the provision at different HEIs, while this would be less of an issue for Welsh students.
- A suggestion (not serious, I presume) that HEIs could charge a higher fee level for Welsh medium provision.

### **Q3 - Fee Grant Scheme**

- Minimising the bureaucratic burden on HEFCW would increase that on HEIs – and vice versa.
- It would be preferable to administer loans for Welsh domiciled students through the same system whether they were studying in Wales or England (or elsewhere). This would avoid difficulties of trying to reconcile data from two different systems.
- The best option would be to make use of the SLC, while also taking account of current feedback on improvements required of that organisation.
- There was a need to avoid a system in which thousands of individual transactions were taking place.
- There was a need to factor in the discrepancy in timing between the current SLC timetable for making payments (February and May) and the proposed new system. HEIs currently receive the teaching grant from August onwards – the changes might present them with cash flow problems in the interim.

### **Q4 - Consultation and Engagement**

- The SLC Communications Forum would be useful group to approach for feedback.
- There was a need for NUS and HEI representation on the Programme Board, or to allow more opportunities for them to raise comments/issues through a comparable forum.

### **Q5 – Ways in which SFW processes could be simplified?**

- The performance of the SFW call centre should be reviewed if the intention was to continue to use its services. Currently, most students ended up approaching local authorities for more appropriate/detailed advice.
- A call centre would be needed if a more centralised model was followed, otherwise the use of consortia might be preferable.
- The SLC was currently undertaking work to improve its data processes for Student Finance in England. Was there any reason why this work was not being implemented in Wales?

### **Afternoon session**

#### **Q1 Fee Plans**

- HEIs needed to know the details of their future funding from HEFCW before setting in place their fee plans. The process was in the wrong order.
- It would be helpful to know what 'demonstrate a commitment to' [merger] meant in relation to WAG/HEFCW expectations of HEIs' fee plans.
- HEIs would be starting from different baselines in relation to different areas of activity – this must be recognised when guidance was being developed.
- Reconfiguration should not be covered by tuition fee income - it ran counter to the aim of widening access set out in the 2004 act.
- Did this approach represent an opportunity to draw a line under HEIs' other strategic plans, ie could fee plans be used as a means of restating priorities in relation to FoD, widening access, etc?
- Could the regionalisation agenda be used in any meaningful sense as a basis for fee plans? (Doubts expressed that it couldn't be.)
- The timing was unrealistic – how could HEIs which are not currently involved in merger discussions include these in the fee plans in any meaningful way?
- How will HEFCW judge whether HEIs have satisfied the requirements/criteria for fee plans? HEIs needed to know this in order to develop the plans initially.
- Fee plan guidance would need to be supplemented by individualised guidance from/meetings between HEFCW and HEIs.
- Would it be possible/feasible to weight the guidance against FoF priorities so as to allow HEIs to demonstrate they had met some of these priorities? Should HEIs focus on just a few of these in the first year or two?
- In relation to widening access, recruitment and retention were important aspect. There was a need to broaden the strategic approach to widening access and ensure that English students still got value for money. Students were also 'consumers'.
- What about repeat students? Would there be any guidance on what HEIs should charge such students, and what other support should be offered to them?
- A contract/student charter should underpin the new regime – students paying £6-9k should be made aware of what they could expect in return in relation to quality, eg minimum number of contact hours.

- Student perceptions about what they are paying for are changing. In some instances, there was a shifting of blame to the institution if a student failed the course – this might be exacerbated if higher fee levels were charged.
- There was a need for sanctions if HEIs didn't deliver against their fee plans. What would these be?
- HEIs have different strengths. How could these be reflected in fee plans?
- There was a need to link the new fee plan regime to arrangements for the cap on student numbers.
- Looser guidance from HEFCW on the content of fee plans would mean less clear objectives and more control for HEIs – there were pros and cons to this.
- One-year plans might be the most workable, at least initially.

## **Table 2 Feedback**

### **General Feedback:**

- It was argued that HEIs should be represented on the Programme Delivery Board.
- There were mixed views over the appropriateness of HEIs being able to charge variable fees for different courses within their institutions. In principle this approach was welcomed but some practical concerns were raised over the complexity of HEIs charging variable fees and the short timescales for HEIs to decide on the fees they will charge for each course. There was some concern that the introduction of variable fees within institutions would lead to some courses being 'more valued' than others. Also it was argued that variable fees would result in prospective students making choices based on the cost of the course. Others argued that a variable fee system already applies to part-time courses and prospective part-time students currently base their choices on the course content rather than the cost of the course.
- What impact will variable fees have on WAG forecasts? WAG modelling is based on an average cost of £7,000 per course.
- Concerns that the expectations of students will increase but the overall funding to HEI will not increase. Will there be a different level of expectation between English and Welsh students, because Welsh students will be able to access the new fee grant scheme?

### **Q2. What are the advantages/ disadvantages of a lower basic fee rate in Wales? What criteria do you consider should be used to determine the level of the basic fee rate?**

- It was felt that this was not a question for HEIs to answer but that a decision should be made as a matter of urgency by WAG.

- It was argued that HEI would need to set their fees higher than £3375 to survive.
- It was argued that the basic rate should be set at below £6000 to ensure that all HEI are required to produce a fee plan.
- Some felt that as HEIs are currently required to produce fee plans setting the basic fee level at below £6000 would not have a great impact on HEIs.

**Q3. How might a non- burdensome fee grant scheme be designed to minimise the administrative burden in HEIs and HEFCW?**

- It was argued that the fee grant scheme should ‘tap into’ existing processes – funding to HEIs via HEFCW and funding to students via the SLC.
- HEFCW will need to track payments at a student level.
- Will there be time to test the new grant scheme before it is rolled out? Concerns were raised regarding the risk of introducing a complex new scheme without sufficient time for testing.
- HEIs raised concerns regarding the impact of the new scheme on HEIs’ cash flow.
- What controls will be in place to prevent students from falsely claiming Welsh residency?
- Will part time courses be included in the scheme?
- Will the fee grant be made available for students already with a degree?

**Q4. What would be the most effective means of engagement and further consultation on the implementation issues identified in the paper?**

There was no discussion on this issue.

**Q1. Fee planning- How should the provisions be expressed? What other issues should the fee planning guidance address? Are there any other conditions you think should be imposed on HEIs wishing to charge more than the basic fee?**

- Clarification was sought on the statutory basis of the fee planning process. It was argued that the contents of the plans should be based on the elements specified in the Higher Education Act 2004 - the promotion of equality of opportunity, and the promotion of higher education.
- It was felt that it was logical to link the fee plans to FOF objectives.
- Is reconfiguration the top priority? Will this be included in the fee planning criteria?
- Widening access and the student experience should be the key priorities.
- It was confirmed that guidance would be issued from WAG to HEFCW on the content of the fee plans
- Fee plans should include hard targets/outcomes linked to the HEFCW Corporate Plan.
- How will student experience be measured? Student Charter? Will minimum standards be set for contact hours, support services etc. Should targets for retention rates be included in the plan?

- Will HEIs be expected to provide information in their fee plans on steps they are taking to encourage widening access background to specific high fee courses –e.g. medicine/ dentistry?
- Clarification was sought on the fee plan approval process – will there be an appeals process where fee plans had been rejected by HEFCW? If a fee plan is rejected is there a risk of legal challenge?
- Will the new fee planning system result in more costs for HEIs?
- Some HEI will provide additional awards and bursaries to English domiciled students.
- Fee plans should be presented in two sections – a forward looking plan and an evaluation of previous activities.
- It was suggested that fee plans should be developed on a 3 year cycle but that HEIs should be asked to report on outcomes and amend targets on an annual basis. It was recognised that some activities would take longer than one year to have measurable impact.
- HEIs requested the option of submitting a draft plan to HEFCW for informal feedback in February before submitting their final plan.
- Should the fee plans include part time provision?

### **Consultation event 24 January – Table 3**

#### **Morning session**

There was plenty of discussion on the potential fee level that institutions will set in 2012/2013 and the financial implications arising from a) setting a fee and b) reduction of the teaching grant. In particular, the group were keen to emphasise the following issues:

#### Question 2

- There was no clear consensus about what the basic fee rate should be set at in legislation;
- it is clear that there is still a degree of misunderstanding about how the tuition fee will be financed. In addition many around the table did not understand that there would be no additional income available to the HE sector in Wales regardless of fee level;
- given the zero additional income scenario, there was some discussion about what the incentive would there be for institutes to charge anything other than £9,000;
- Students (in particular those from England) will expect improved services and value for money for the additional fee – this will leave the institutions with a difficult balancing act;
- Institutes would be unlikely to set fees at the lower level given the reputational risks of setting a lower rate than their competitors;
- There is a need for more information and data sets in Wales to allow students to evaluate student experience – this would be similar to the consultation currently being undertaken by HEFCE
- Some concern that part time proposals were being developed at a slower pace and that this could lead to a position where all the finance has been allocated to full time students;

### Question 3

- There was some discussion about using SLC where possible, although I don't think that there was sufficient understanding of the complexities involved with administering the new grant in Wales.

### **Afternoon session**

There was no consensus on whether the fee plan should contain the reconfiguration agenda. Whilst all agree that fee plans needed to reflect HEFCW key priorities, there was a feeling that reconfiguration did not sit equally in line with our future objectives and that there was a concern that we were asking HEIs to respond to too many initiatives and strategies.

However, it was also recognised that it would be difficult to leave reconfiguration out of plans given Ministerial priorities.

Everybody agreed that there was a need for:

- Measurable outputs and clear objectives
- Evidence of improved performance given rise in students expectations
- Clear penalties for failure to achieve targets
- Students should be able to access up to date relevant information about performance
- Regular updates to ensure target and achievements are relevant and achievable
- Need for realistic timescales

### **Student Finance Consultation and Workshop 24/01/11**

**Q2. What are the advantages/ disadvantages of a lower basic fee rate in Wales? What criteria do you consider should be used to determine the level of the basic fee rate?**

- If HEIs set the fee below £6k then they do not need to produce a fee plan and don't have to address any of the issues e.g. widening access.
- However setting the fees at a lower amount seems counter intuitive because the HEIs will lose out on their funding.
- HEIs already produce fee plans, so this request is not new.

- Issues identified for part time courses that an increase in fees and the introduction of grants for fees will reduce significantly the number of part time students willing to take on the level of debt.
- Students will have less choice because there is no auto progression.
- HEFCW will be open to judicial review as a result of judgements made regarding the fee plans.
- What will be the structure of the fee plans? A statement of intent- which is legally worthless. They must have credibility. Could a plan say that the HEI are working towards an objective?
- Concern that if HEFCW are not content with the fee plan, that HEIs may be forced into a merger.
- Concern over very tight timescale for the introduction of the new fee plan system and whether proper consideration has been given to possible legal challenges.
- HEIs feel in limbo about reconfiguration and would prefer to have had more time to resolve associated issues.
- A general concern about the future of the HE sector and how it needs to be protected.
- The Minister has set the agenda of fee plans, so he must set the criteria.
- Once the fee plan criteria are set, then the goalposts should not change significantly year on year.
- What is plan B? The previous time a fee regime was introduced, the sector had a years grace to resolve issues.
- Is charging £6k a realistic fee? Will part time students continue to go to HE and be prepared to take on the debt?
- The sector needs to embrace the new system for the good of the students.
- What happens if HEFCW refuse a fee plan? Would the fees have to be reduced? Any penalty?
- A fear that the Minister has introduced yet more bureaucracy, and what impact this will have on the sector in 5 years time. Would more HEIs consider centralising services?

- HEFCW may have difficulty in comparing fee plans for different sized/ structured HEIs.
- Will there be pressure on HEIs to improve the student experience as students see themselves as the customer?
- WAG is in denial about the cross boarder issue, that we are dependent on the right amount English students studying in Wales. What happens if they chose to stay in England?
- By introducing fee plans, the Minister is creating a competitive market in HE, but there is the competition law issue which conflicts with these plans.
- Can HEIs set different rates for different courses? Some courses are more expensive than others.
- What about fees for international students? There is an argument that EU and international students are more costly because they need more support/ help with the language than UK students. Would the fee charge actually cover the actual cost?
- Wales has had a good performance on widening access, at least better than England, so our focus for fee plans may be different to English HEIs.
- The first year of the system HEIs will not know what their competitors are charging until the prospectuses are published due to laws on competition in the sector. After that, fee rates can be adjusted in line with other HEIs.

**Q3. How might a non- burdensome fee grant scheme be designed to minimise the administrative burden in HEIs and HEFCW?**

- Utilise the SLC payment mechanism. Due to the detailed info that HEIs would require, it makes sense for SLC to operate it. Although worries that such a process would be costly.
- Could the previous TFG system be used?
- Who would pay for the administration? Would it be HEIs baring SLCs costs or WAG?
- HEFCW currently has powers to pay e.g. English institutions. Why these powers couldn't be used. Why do we need new powers?
- A student's entitlement for fee grant must be linked to their entitlement for other student support.
- HEIs would like regular payment of fees and the current twice a year is not frequent enough and creates cash flow issues. Monthly payment would be ideal.

- Would there be a contingency in place in case HEIs did not receive their fees?
- Fee planning creates extra work for HEI which may create capacity issues.
- Communications with SLC is the key to making all of this work.
- SLC priority will always be to England and concern that this work will not get the focus it deserves.
- Would plan B involve HEIs not having a fee plan in place? Could we piggy back the English system? Could we revert to the status quo for a year? Could we operate an informal gentlemen's agreement?

**Q4. What would be the most effective means of engagement and further consultation on the implementation issues identified in the paper?**

- There should be five to ten people representing HEIs on the Board, who actually work with the system. Need to focus on the practicalities of paying the fee grant.
- The timescale doesn't really allow the work required to be properly carried out.
- The people on the board need to be the people who understand how the system works- i.e. not directors of education and the like.

**Q1. Fee planning- How should the provisions be expressed? What other issues should the fee planning guidance address? Are there any other conditions you think should be imposed on HEIs wishing to charge more than the basic fee?**

- Whatever criteria is decided upon, it needs to be clearly expressed to HEIs.
- HEIs currently write corporate plans which include actions to achieve certain objectives. Couldn't these be combined to avoid duplication? The objectives sited in the fee plans will not be new activities, so no point in creating another doc.
- Would HEFCW question that a particular HEIs proposed fees are different to another comparable HEI?
- Would HEFCW accept an objective that falls outside its own charitable aims and objectives?
- Where do bursaries fit into the new system?

- The current fee planning doc runs for 5 years. Would this one be renewed annually? An annual plan does not allow HEIs sufficient time to put plans in place and see real results. Perhaps every two to three years? Interim milestones? HEFCW would be approving AY 2012/13 in 2011.
- How detailed will be plans need to be? (Suggestion that HEIs includes objectives in the fee plan, but up to HEIs how these objectives are achieved).
- If HEFCW are monitoring HEIs achievements, this could be positive exercise.
- Plans could cross reference a HEIs corporate plan to avoid duplication.
- If objectives aren't achieved, will a reduction in fees have to be charged next year?
- Can WAG provide some assurances that the fee grant will continue for the foreseeable future? HEIs would not want to adopt a system which was only around for a year or two.
- Regarding the targets; some HEIs may not expect an improvement in certain aims e.g. demand may not improve in the long run if there is a drop in demographics. Therefore the fee plans may include targets which simply include a desire to hit current levels of students.
- If there was a downward trend in demographics over the next 5 years, and fees income became depressed and recruitment declined, would the system be reviewed?
- Would the fee plan criteria be different for those HEIs who have gone through re-figuration?
- The HE sector must align planning and operational efficiencies for this to work.
- The prospect of regional planning is an issue due to competition law, but on the face of it seems like a sensible option.
- WAG must ensure that the process cannot be challenged by a judicial review.
- HEIs cannot change their criteria and objectives substantially year on year because each time you realign objectives you skew the business.
- HEIs need different fees for different subjects e.g. stem subjects.
- HEIs aren't getting any more money for their troubles.

## Student Finance Consultation and Workshop 24/01/11

### Table 4 Feedback:

#### Q2. What are the advantages/ disadvantages of a lower basic fee rate in Wales? What criteria do you consider should be used to determine the level of the basic fee rate?

- If HEIs set the fee below £6k then they do not need to produce a fee plan and don't have to address any of the issues e.g. widening access.
- However setting the fees at a lower amount seems counter intuitive because the HEIs will lose out on their funding.
- HEIs already produce fee plans, so this request is not new.
- Issues identified for part time courses that an increase in fees and the introduction of grants for fees will reduce significantly the number of part time students willing to take on the level of debt.
- Students will have less choice because there is no auto progression.
- HEFCW will be open to judicial review as a result of judgements made regarding the fee plans.
- What will be the structure of the fee plans? A statement of intent- which is legally worthless. They must have credibility. Could a plan say that the HEI are working towards an objective?
- Concern that if HEFCW are not content with the fee plan, that HEIs may be forced into a merger.
- Concern over very tight timescale for the introduction of the new fee plan system and whether proper consideration has been given to possible legal challenges.
- HEIs feel in limbo about reconfiguration and would prefer to have had more time to resolve associated issues.
- A general concern about the future of the HE sector and how it needs to be protected.
- The Minister has set the agenda of fee plans, so he must set the criteria.
- Once the fee plan criteria are set, then the goalposts should not change significantly year on year.

- What is plan B? The previous time a fee regime was introduced, the sector had a years grace to resolve issues.
- Is charging £6k a realistic fee? Will part time students continue to go to HE and be prepared to take on the debt?
- The sector needs to embrace the new system for the good of the students.
- What happens if HEFCW refuse a fee plan? Would the fees have to be reduced? Any penalty?
- A fear that the Minister has introduced yet more bureaucracy, and what impact this will have on the sector in 5 years time. Would more HEIs consider centralising services?
- HEFCW may have difficulty in comparing fee plans for different sized/ structured HEIs.
- Will there be pressure on HEIs to improve the student experience as students see themselves as the customer?
- WAG is in denial about the cross boarder issue, that we are dependent on the right amount English students studying in Wales. What happens if they chose to stay in England?
- By introducing fee plans, the Minister is creating a competitive market in HE, but there is the competition law issue which conflicts with these plans.
- Can HEIs set different rates for different courses? Some courses are more expensive than others.
- What about fees for international students? There is an argument that EU and international students are more costly because they need more support/ help with the language than UK students. Would the fee charge actually cover the actual cost?
- Wales has had a good performance on widening access, at least better than England, so our focus for fee plans may be different to English HEIs.
- The first year of the system HEIs will not know what their competitors are charging until the prospectuses are published due to laws on competition in the sector. After that, fee rates can be adjusted in line with other HEIs.

**Q3. How might a non- burdensome fee grant scheme be designed to minimise the administrative burden in HEIs and HEFCW?**

- Utilise the SLC payment mechanism. Due to the detailed info that HEIs would require, it makes sense for SLC to operate it. Although worries that such a process would be costly.

- Could the previous TFG system be used?
- Who would pay for the administration? Would it be HEIs bearing SLCs costs or WAG?
- HEFCW currently has powers to pay e.g. English institutions. Why these powers couldn't be used. Why do we need new powers?
- A student's entitlement for fee grant must be linked to their entitlement for other student support.
- HEIs would like regular payment of fees and the current twice a year is not frequent enough and creates cash flow issues. Monthly payment would be ideal.
- Would there be a contingency in place in case HEIs did not receive their fees?
- Fee planning creates extra work for HEI which may create capacity issues.
- Communications with SLC is the key to making all of this work.
- SLC priority will always be to England and concern that this work will not get the focus it deserves.
- Would plan B involve HEIs not having a fee plan in place? Could we piggy back the English system? Could we revert to the status quo for a year? Could we operate an informal gentlemen's agreement?

**Q4. What would be the most effective means of engagement and further consultation on the implementation issues identified in the paper?**

- There should be five to ten people representing HEIs on the Board, who actually work with the system. Need to focus on the practicalities of paying the fee grant.
- The timescale doesn't really allow the work required to be properly carried out.
- The people on the board need to be the people who understand how the system works- i.e. not directors of education and the like.

**Q1. Fee planning- How should the provisions be expressed? What other issues should the fee planning guidance address? Are there any other conditions you think should be imposed on HEIs wishing to charge more than the basic fee?**

- Whatever criteria is decided upon, it needs to be clearly expressed to HEIs.
- HEIs currently write corporate plans which include actions to achieve certain objectives. Couldn't these be combined to avoid duplication? The objectives sited in the fee plans will not be new activities, so no point in creating another doc.
- Would HEFCW question that a particular HEIs proposed fees are different to another comparable HEI?
- Would HEFCW accept an objective that falls outside its own charitable aims and objectives?
- Where do bursaries fit into the new system?
- The current fee planning doc runs for 5 years. Would this one be renewed annually? An annual plan does not allow HEIs sufficient time to put plans in place and see real results. Perhaps every two to three years? Interim milestones? HEFCW would be approving AY 2012/13 in 2011.
- How detailed will be plans need to be? (Suggestion that HEIs includes objectives in the fee plan, but up to HEIs how these objectives are achieved).
- If HEFCW are monitoring HEIs achievements, this could be positive exercise.
- Plans could cross reference a HEIs corporate plan to avoid duplication.
- If objectives aren't achieved, will a reduction in fees have to be charged next year?
- Can WAG provide some assurances that the fee grant will continue for the foreseeable future? HEIs would not want to adopt a system which was only around for a year or two.
- Regarding the targets; some HEIs may not expect an improvement in certain aims e.g. demand may not improve in the long run if there is a drop in demographics. Therefore the fee plans may include targets which simply include a desire to hit current levels of students.
- If there was a downward trend in demographics over the next 5 years, and fees income became depressed and recruitment declined, would the system be reviewed?
- Would the fee plan criteria be different for those HEIs who have gone through re-figuration?
- The HE sector must align planning and operational efficiencies for this to work.

- The prospect of regional planning is an issue due to competition law, but on the face of it seems like a sensible option.
- WAG must ensure that the process cannot be challenged by a judicial review.
- HEIs cannot change their criteria and objectives substantially year on year because each time you realign objectives you skew the business.
- HEIs need different fees for different subjects e.g. stem subjects.
- HEIs aren't getting any more money for their troubles.

Consultation day 24 January - Discussion on table 5 (morning)

**What would be the advantages or disadvantages of a lower basic fee rate in Wales? What criteria do you consider should be used to determine the level of the basic fee rate?**

It was felt that the following issues would be important:

- Prestige, coupled with value – if Wales had a basic fee of circa £3k there's a danger they'd look like a 'bargain basement' in comparison to England.
- If the basic fee were set at £6k then there would be more consistency with England and consequently less communication issues.
- The University of Glamorgan only draws 15% of its students from England, meaning that the affordability of the fee level is less of an issue, considering Welsh students won't be expected to find any more of the money than they do now.
- Where do EU students stand? (I informed them that currently it would appear EU students would be eligible for fee support ).
- Break even point of courses is an important consideration - ? Bryson from the University of Glamorgan was under the impression that each university would get £1100 less per student from the teaching grant, but potentially could keep an extra £2600 from the student. (I wasn't in a position to confirm or deny this assumption).
- Rob Humphreys from the Open University felt that there would be a growing tendency to disaggregate courses, meaning that there may be a wide gap between different course fees, depending on the subject.
- A lower fee rate may just increase demand because of the students' perception – although different demographics may behave differently, with middle classes feeling that more expensive courses were bound to be better.
- High fees will increase student expectations, even though the actual income from a course may not increase.
- If a student can go to England and pay £9k for a course which they perceive to be one of the best, why would they stay for a cheaper equivalent in Wales, when the cost to them would not differ?
- Advantages for WAG if there are more fee plans in place.
- Scholarships and bursaries could be used to offset some of the costs for students from elsewhere.

Criteria:

- Comparison with England
- Allow institutions to maintain overall funding levels
- Need to simplify the overall fee planning process – should they ‘band’ the fees?

#### **How might a fee grant scheme for Wales be designed to minimise the administrative burden on HEIs and HEFCW?**

- Strong feeling that they liked the current system – why couldn’t that continue to be used? Much time had been spent refining it with SLC – would the same time be needed in order for HEFCW to climb a steep learning curve?
- Alternatively HEIs would have to submit returns to HEFCW – not sure if HEFCW were equipped to deal with it.
- Summary data would have to be for specific students. Making it hard for HEFCW to administer.
- Cash flow issue if payment dates remained the same – I explained that the new regulations are likely to have a little more flexibility in terms of payment dates.

#### **What would be the most effective means of engagement and further consultation on the implementation issues identified in this paper?**

- Student rep from Aberystwyth suggested regional focus groups if the tight timescale would allow – even if it just clarified the perception of the changes amongst the students.
- Part time stakeholder consultation needed to include a whole range of new stakeholders in the view of the OU. This should include employers, workforce development colleagues etc.
- Alison Hutchins’s practitioners’ group would be in a good position to advise on the practicalities of a possible new grant payment system. (Alison is based in Swansea university and a member of our Ops group)

#### **Are there other ways in which Student Finance Wales processes could be simplified to reduce complexity and cost?**

- Strong feeling that driving students online is a positive step

#### **FEE PLANS**

##### **(Feedback from afternoon session)**

Main concerns:

Institutional Prestige

## Value for money

If students are paying more, what are the outcomes for increased cost?

Not plugging the gap with bad habits.

- The group felt there needed to be more strategy in place for fee plans to include; access, quality of application, promoting HE, reconfiguration, merger etc. They could also incorporate those already in place for 'For our Future'.
- Concerns were expressed as to how the fee plans could be quantified across the institutions e.g. how do you judge what each Institution is doing and how is this quantified?
- Output target plans preferred. Outputs should be measurable and not based on amount spent.
- Should there be more justification contained in fee plan for the greater increase in fees eg. if a Uni charges 8k compared to another charging 6.5k should greater demands be placed on that charging 8k?
- As Cardiff has already merged, the assumption is that they will have completed the reconfiguration required. Will other forms of collaboration represent reconfiguration e.g. Research Departments and Central Services? Looking ahead, the group felt it was difficult to see past where we are now.
- Should we be arguing strong justification for higher fees?
- Flat fees & use bursary.
- Fear that students will be used as bargaining chips against other Institutions.
- Concern that Institutions are not receiving any more funding but there is a requirement to deliver more.
- Where do you differentiate between Strategic plans/Fee plans? Use Strategic plans? How can these be written for 2012 and incorporate reconfiguration/merger plans? Should fee plans take over the normal targets and also include reconfiguration?
- The group felt that WAG need to be clear about what they mean by reconfiguration eg. small Uni's could merge in name only but no savings made. Need to define merger. How far do you have to go to prove this? Some members of the group felt this was yet another level of bureaucracy added to the system.
- If Wales do not increase fees to the same level as England eg. £9k, Wales will be perceived to be inferior (students themselves could also have this view).
- Would there be any penalty for not reaching the targets set out in the fee plan? The group discussed their concerns about having contained in the fee plan and want penalty would be bestowed if this was not undertaken. The group felt that upon them and felt that merger/reconfiguration not be linked with the fee plan.
- The group felt strongly that no other conditions should be placed upon Institutions. They felt that Uni's work better with more freedom rather than being Govt controlled. Additional strategic planning already in place as a result of 'For our Future' – not sure what else/more Uni's can do/measure?
- Level of fee income for part time is another issue to be considered.
- How will the increase in fees benefit the students' experience? Students will expect more for their money, but Institutions will be unable to make any significant changes as no increase in funding.
- HEFCW Corporate Strategy should include all other targets that could be included in fee plans. High level but measurable targets.

### Flip chart summary:

#### Q1 a

- i) Through a strategic plan (fees plan)
- ii) For our Future targets/HEFCW
- iii) **Priorities – clear output targets NOT input measures**

#### Q1 b

- i) What constitutes a merger/reconfiguration?
- ii) Recent history needs to be acknowledged (eg. Cardiff, Uni Glam respective mergers)
- iii) Will other forms of collaboration constitute reconfiguration eg. Research, Central Services

#### Q1 c

Universities say 'NO' to other conditions being imposed on HEIs. There needs to be recognition of no additional income to Universities.

### Table 6

#### Morning session

#### Q2 Basic Fee Rate

- If the basic rate is not set at £6k there may be a perception of Welsh HE sector being disadvantaged as compared to English sector (in terms of funding).
- However, an alternative view was put forward that a higher basic rate (than the current fee level) could be seen as being unfair for students unless greater value is delivered through the experience received.
- Conditions set for fee plans should include a requirement about how the student experience will be addressed in view of the higher tuition fee charged and should not be measured just via the National Student Survey results.
- Some participants considered that there could be a reputational risk for Welsh HE sector as compared to English sector if the basic fee rate is lower than in England.

- Clarity is required on the requirement for fee plans if an institution charges above the basic rate for only some of its courses - as the ability to vary fees is not understood by the sector as a whole.
- If basic fee rate were to be set at approximately the current upper fee limit concerns were expressed that this may risk an adverse impact on teaching quality and the student experience.
- If basic fee rate is so low that all institutions would need to charge above that value then the process of justifying why a higher fee needs to be charged could become a bureaucratic process for institutions.
- Recognising the intention to make that arrangements for part-time provision will be at a later date participants considered that it would be important not to lose sight of potential implications for part-time courses now as decisions on full-time fee rates are likely to impact on the basic fee rate for part-time courses.
- There is a need to clearly communicate intentions for part-time provision as the current uncertainty may have an adverse impact on choices made by students entering HE through widening access routes who may be deterred from making applications for part-time courses.

### **Q3 - Fee Grant Scheme**

- Participants recognised that there could be potential advantages and disadvantages to different delivery mechanisms.
- Routing payments via the SLC route appeared to some to be the least disruptive option for HEIs as the administration burden would remain the same.
- However there was also recognition that there may be some difficulties in respect of the timing of payments of the fee grant via the existing SLC route.
- There needs to be an analysis of the advantages / disadvantages of delivery of the fee grant via the SLC and HEFCW routes.
- Further details of how the mechanism would work in respect of students not applying for loans for the existing fee are needed e.g. clarity is needed on how such students be identified in the system and trigger payments of the fee grant.
- In respect of minimising the need for additional data collection a question was raised as to whether there would be additional burdens for HEIs under the HEFCW mechanism? HEIs already return HESIS data so possibly not a significant requirement but there may be a need for some additional information on top of the existing return. Could the data held in SLC systems be accessed by HEFCW to prevent a duplication of data returns and would this reduce transaction costs?

- It was considered **essential** that clear advice is provided to applicants as to whether they will need to apply for a loan. This needs to be part of an overall package of communication aimed at potential students as the changes are complex and could be misunderstood.

#### **Q4 - Consultation and Engagement**

- Questions were raised as to why there was no representation from the HE sector on the Programme Delivery Board. It was considered that representation from HEW, a HEI and NUS Wales should be sought in the longer term as the changes arising from delivery will impact on institutions and students.
- It was recognised that an alternative to representation on the Board could be to establish a stakeholder reference group or an engagement group, and to consider a virtual as well as a physical group to ensure effective dissemination of information and provide opportunities for feedback.

#### **Q5 – Ways in which SFW processes could be simplified?**

- The availability of information on the SFW website should be more comprehensive - a comparison with the SFE site should be undertaken to ascertain where improvements could be made.
- It was recognised that a key factor determining the content of the SFW web site should be ensuring that the right level of detail is available to students and perhaps analysis of customer groups needs should be the starting point. The site design and content should be proofed against student's needs (consult with them) and also include signposting to relevant advice and guidance possibly via links.
- Need to ensure that existing students and new applicants are aware of how the changes affect them and any actions they need to take e.g. gap year applications. Consideration should be given to getting key messages out via UCAS and visits to institutions - NIASMA(?) and NUS key contacts in this respect.

#### **Afternoon session**

##### **Q1 Fee Plans**

The group considered potential conditions on the basis of the promotion of equality of opportunity in respect of access to higher education and separately in respect of promotion of higher education.

##### **Promotion of equality of opportunity in respect of access to HE:**

#### Key points in respect of requirements:

- It is not just access that matters, retention is also important
- The nature of support offered by HEIs to students needs to be made clear e.g. will institutions now seek to offer non-Welsh domiciles more support because Welsh domiciled students will not have to pay the full fee?
- The conditions should be informed by best practice – consider the requirements in place across the rest of the UK
- It would be preferable if there was evolution from existing fee plans to the new requirements rather than a step change.
- Focus on key objectives only not a huge list of things that must be complied with.
  
- Participants consider that as institutions already submitted plans to HEFCW for approval (Learning and Teaching Strategies, Widening Access plans, Strategic Plans etc.) and that it would be helpful if the actions already put in place in such plans could be cross-referenced. It was recognised that in order to do this there would be sequencing issues and the timing of the plans would need to be aligned.
  
- Participants raised a query about how additional fee income would be defined under the new arrangements as there is a trade off between fee income and teaching grant. This would have implications if a requirement to ring fence a proportion of the additional fee income was put in place to support widening access provisions or for financial assistance to students.
  
- A suggestion was made that it may be helpful to consider the services to be provided to all students e.g. advice and counselling and that additional fee income could be made available to support such activities.
  
- The reduction in Financial Contingency Funds was highlighted as a source of concern by institutional and student representatives alike. The institutions would retain their own hardship funds and queried whether there would be a requirement to provide such funds via the Fee Plans.
  
- It was suggested that it would be helpful to consult with the student body via the NUS to gain a better understanding of the needs of students and the type of financial support which would make a difference. This could then inform the decisions taken about the requirements to be placed on institutions.
  
- A query was raised about whether the support could go beyond access to HE e.g. to support the employment focus and possibly the supporting the transition from FE to HE to aid progression. In addition it would be helpful if the Fee Plan requirements could be aligned with other statutory and voluntary commitments placed on HEIs e.g. mental health support, provision to care leavers under the Frank Buttle Trust Quality Mark etc.

#### Promotion of Higher Education

- The group considered that interpretation of this objective could be manifold e.g.

- Promotion of the sector at regional, national and international levels
  - Promotion of higher education opportunities to prospective students – encouraging take up of provision
  - Promotion of high level training opportunities and other services to employers
  - Promotion of international interests e.g. R&D
- HE sector representatives noted the potential to drive the reconfiguration and collaboration agenda via the fee plans but considered that there could be unintended consequences of use of such a blunt instrument and that an alternative approach may be considered to be preferable using HEFCW's core funding via the institutions' strategic plans.
  - In keeping with the approach advocated for the equality of opportunity objectives it was suggested that key performance indicators from the Teaching and Learning Strategies and the Strategic Plans were integrated with the Fee Planning requirements.
  - Concerns were raised about the potential for denying fee charging opportunities (if a lower basic rate were to be chosen) and a question was posed as to whether the Minister has the powers to enforce merger in this way and whether the Fee Plans could achieve the critical mass within the Welsh HE sector.
  - Timing could be an issue of concern as the Fee Plans would provide for AY 2012/13 and HEFCW's Corporate Strategy targets were also to be achieved by the same timescales.
  - From the perspective of students merger alone would not necessarily improve the student experience.
  - It was noted that merger and reconfiguration aside other For Our Future targets could also be considered to include aspects of the promotion of higher education and thought would need to be given to how these could be reflected in Fee Planning requirements.
  - In view of the potential breadth of requirements for the promotion of HE objective it was suggested that the regulations should include the key priorities only and that guidance should provide for the detail of the requirements to be put in place by HEFCW.
  - A proposal was made to consider meeting the sector reconfiguration target via alternative routes e.g. conditions of grant on HEFCW's core funding
  - There needs to be recognition of the balance between fee income / fees charged and the HEFCW teaching funding – this is not well understood by the sector.
  - If institutions were to charge different fees above the basic rate would it be possible to impose conditions at staged income levels?