

## Circular

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### Welsh Medium Premium Payments

**11 September 2007 Ref: W07/36HE**

To: Heads of higher education institutions in Wales;  
Principals of directly funded further education colleges

Summary: Following work done in 2006 on the costs of Welsh medium provision and subsequent consultation with the sector, this circular provides revised guidance on returning data on Welsh medium provision to the Higher Education Statistics Agency (HESA) and on how that data will be used by HEFCW to determine Welsh medium premium allocations.

Response by: No response required

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## **INTRODUCTION**

- 1 Following work done in 2006 on the costs of Welsh medium provision and subsequent consultation with the sector, this circular provides revised guidance on returning data on Welsh medium provision to the Higher Education Statistics Agency (HESA) and on how that data will be used by HEFCW to determine Welsh medium premium allocations.

## **BACKGROUND**

- 2 HEFCW uses data from HESA records on Welsh medium provision to derive information for Welsh medium premium allocations and to measure progress against the Reaching Higher Welsh medium target. Analysis of this information, as well as other data returned to HESA on staff teaching through the medium of Welsh and Welsh-speaking students also contributes to a fuller understanding of the position of Welsh medium provision in the sector.
- 3 Since the publication of a report in 2006 which HEFCW commissioned from London Economics on the costs of Welsh medium provision, we have been considering, in consultation with colleagues in the sector, revisions to the arrangements for Welsh-medium premium funding and providing updated guidance in the light of this.
- 4 Following an initial seminar in September 2006, when the consultants presented their report, we held a formal consultation in the first part of 2007 (Circular W06/56HE). Since then our conclusions have also been helped by the annual workshop with sector statistics staff in June 2007 and observations by sector colleagues within broader discussions on Welsh medium provision.
- 5 The consultation focused firstly on the eligibility threshold for premium funding in terms of the volume of Welsh medium provision delivered. The consultation then covered a range of issues on the definition of Welsh medium teaching within a module and the subjects eligible for premium payments. Finally it sought views on the data recorded by HESA on staff teaching through the medium of Welsh. We will be reporting on this latter aspect of the consultation separately.
- 6 The following paragraphs set out our conclusions in response to the consultation. Information has been incorporated as required into the guidance at Annex A. We have listed respondents to the consultation in Annex B.
- 7 We have noted below that we will aim to build up illustrative examples of particular practice in Welsh medium provision to support the guidance. In doing this, we envisage that the Welsh Medium Higher Education Sector Group, which has been established as part of the new sector strategic framework for Welsh medium provision, will provide a focus for discussion on these issues.

## **ELIGIBILITY THRESHOLD**

- 8 In considering the eligibility threshold for premium funding, we were mindful of the need to balance
  - a desire to encourage as much Welsh medium delivery as possible, and to ensure that the additional costs of such provision are reflected in additional funding through the premium, with
  - the desire to ensure that such Welsh medium delivery is of a meaningful volume.

We also wished to ensure that Welsh medium provision attracts premium funding in an equitable manner, and that comparable volumes of provision are not excluded from eligibility for premium funding inappropriately.

- 9 Thus in the consultation we proposed maintaining a minimum threshold proportion of the module which is delivered through the medium of Welsh for the provision to be eligible for premium funding. However, we also proposed changing this from 25% of the module to two credits, which, at 20 notional learning hours, we considered to represent an appropriate minimum experience through the medium of Welsh to be meaningful for this purpose.
- 10 This change was strongly supported by most respondents to the consultation and was introduced for the calculation of 2007/08 premium funding. This was confirmed in the Recurrent Grant circular for 2007/08 (W07/12HE).
- 11 We would wish to emphasise again a point which we made in the consultation document. Defining the minimum threshold in terms of credit volume, rather than a module percentage, has no impact as such on data collection requirements. Institutions continue to return the percentage of the module delivered through the medium of Welsh. HEFCW staff then calculate a notional credit volume delivered through the medium of Welsh as the product of the percentage indicator and the total credits for the module.
- 12 We would also wish to emphasise a further point on which we have become aware there may be some confusion. As previously, the premium is calculated on that proportion of the module recorded as being delivered through the medium of Welsh expressed in numbers of credit values, not the credit value of the whole module. Thus, if a 40 credit module is recorded as having a credit volume of 5 credits delivered through the medium of Welsh, the value of the premium is calculated on 5 credits **not** 40 credits.

#### **DEFINITION OF A WELSH MEDIUM TEACHING MODULE**

- 13 The consultation noted that the existing statement defining a Welsh medium teaching module had not been updated since 1994. Its terminology no longer reflected current practice in learning and teaching, focussing too sharply on formal teaching and making no provision, for example, for e-learning and non-written assessment. We included a proposed revised definition in the consultation.
- 14 The definition retained the principle from the earlier definition that for a module to be considered as delivered entirely through the medium of Welsh (and therefore eligible for a 100% premium on that module), the student must complete all assessment work in Welsh.
- 15 We consider that this principle is important both for the integrity of the premium system and of the concept of studying a module or course completely through the medium of Welsh. We do not consider that it provides a disincentive to the delivery of high proportions of a module in Welsh, although the student may opt to complete assessment in English, as this is accommodated within the premium system. Moreover, while we would not wish a student to be discouraged from participating in a module delivered through the medium of Welsh by an insistence on assessment in Welsh, we recognise that institutions also seek to build the confidence and competence of their students, so that they feel more able to be assessed in Welsh.
- 16 In the consultation we raised this issue specifically in the context of circumstances where a module might be delivered wholly in Welsh but the students opts to be assessed through the medium of English. We did not receive a clear indication of the extent to which this occurs. However, we did receive some helpful comments which highlighted the complexities which can exist. Some responses noted instances where, in modules delivered through the medium of Welsh, students generally completed assessments in English, others where assessment in Welsh was the norm. Other comments related to differing practice in terms of modules which were delivered partially through the medium of Welsh. It was also noted that individual students may vary their choice of assessment language within a module.

- 17 We recognise that it is impractical for HEFCW to give guidance which covers every fine variation, and even if it could, this would represent an inappropriate level of intervention in institutional responsibilities and create an unacceptable administrative burden on institutions. We would therefore expect institutions to exercise judgement and integrity in determining the proportion of a module (including assessment) which is delivered through the medium of Welsh, and that they would have confidence that their decisions would stand up to audit. Some factors which we would expect to be taken into account are noted in the guidance at Annex A.

### **SUBJECT ELIGIBILITY**

- 18 In the consultation we set out proposals on the definition of subjects eligible for Welsh medium premium payments. This was to take account of curriculum developments since the guidance was originally issued, such as technology-enhanced learning and professional skills provision. The consultation responses did not provide us with many further specific examples of modules of which we were not aware, where the judgement on eligibility may not always be clear cut. Further instances may arise in the normal development of curricula in particular subjects or in curricula specifically devised with Welsh medium skills or provision in mind.
- 19 We may therefore need to make decisions on these instances, within the overall guidelines, as they arise. Each year, we check the Welsh medium data outputs manually for possible errors or entries where it is not clear whether the provision concerned should be eligible for the premium. However, in response to concerns raised by institutions, we will aim to discuss such instances with them in advance of sending out the formal verification requests. We will also note in the verification requests any entries which we have excluded. Any decisions we make on eligibility in a particular subject area will be notified to the sector as whole, although we will not identify the institution concerned. In this way, we can build up the guidance available to institutions.
- 20 We would also encourage institutions to discuss with us new provision which they are developing if they are uncertain about its eligibility for premium funding. We would also anticipate that the overview of provision development which the Welsh Medium Higher Education Sector Group will take will help achieve a consistent understanding.
- 21 In instances where we are uncertain about the basis for an institution's judgement that provision is eligible for the premium, we may ask the institution for further information.
- 22 Guidance on subject eligibility is included in Annex A.

### **MODULE BASED PAYMENTS**

- 23 In the consultation, we noted the suggestion of a further incentive to increasing Welsh medium provision through additional payments on a per-module basis for the delivery of Welsh medium modules. We considered this and took the view that this could lead to a diversion of energy in the development of curriculum dissipated across a larger number of smaller modules in order to attract the additional funding, with no appreciable improvement in Welsh medium provision. We did not receive responses during the consultation which led us to change this view and we will not therefore move forwards with this proposal.

## **TIMESCALES**

- 24 Institutions may use this guidance to inform their decisions immediately. However, given that the data which the Council uses to calculate premium payments is retrospective, the guidance will take time to feed through to institutional allocations. In our analysis of the data each year, we will consider the impact which the changes are having. In the light of our analysis and discussions with institutions on implementing the guidance, we will amend or expand the guidance as appropriate, so that it remains up-to-date and fit for purpose.

## GUIDANCE ON WELSH MEDIUM PREMIUM PAYMENTS

HEFCW makes premium payments in recognition of the extra costs associated with delivering provision through the medium of Welsh. From 2007/08, the calculation of the Welsh medium premium is based on the HEFCW Unit of Funding, rather than a Unit of Resource as previously (see Circular W07/12HE, *Recurrent Grant 2007/08*, for further information).

The premium payments are calculated on the basis of the number of students taking a module wholly or partly through the medium of Welsh and the proportion of the module delivered through the medium of Welsh. The minimum number of credit values on the module which must be notionally delivered through the medium of Welsh to be eligible for premium funding is 2 credit values (20 notional learning hours).

The guidance below covers:

- Definition of a Welsh medium teaching module
- Subject eligibility
- Data extraction and calculation of Welsh medium premium funding.

## DEFINITION OF A WELSH MEDIUM TEACHING MODULE

- 1 The following criteria are to be adopted in defining a module as one which is delivered wholly or partly through the medium of Welsh:
  - a) The module should be a structured element of delivery, with a syllabus approved in accordance with the institutional conventions.
  - b) Where the module is recorded as delivered entirely through the medium of Welsh, all assessment work by the student must be completed in Welsh.
  - c) Where the module is delivered partially through the medium of Welsh, institutions should calculate the proportion of the module which is delivered through the medium of Welsh. This approach should also be adopted where a module is delivered wholly through the medium of Welsh but assessed through the medium of English. Such a module may not be returned as 100% through the medium of Welsh.
  - d) Some factors which institutions may consider in determining the proportion where a module is delivered wholly through the medium of Welsh but assessed wholly or partly through the medium of English are:
    - A judgement on the proportion which assessment represents in terms of the delivery activity associated with the module.
    - A judgement on the extent to which delivery in Welsh has required the provision of Welsh medium independent study or library resources, in addition to classroom-based resources.
    - Where modules may be delivered through e-learning or technology-enhanced learning and on-line or face-to-face support from a member of academic staff is or may be required, whether this is available through the medium of Welsh.

These factors may also be helpful for institutions in determining proportions of modules taught partly through the medium of Welsh.

- e) Given that there can be variations in the proportion of the Welsh medium delivery in which individual students on the module choose to participate or, in a module delivered wholly in Welsh, the amount of assessment completed in Welsh,

institutions may calculate an average proportion taken by students on the module (or an estimated average based on a sufficient and representative sample of students on the module). Although we consider this unlikely, we would, however, have concerns if this approach covered such extreme variations in participation within a module that it risked seriously distorting the data, as we also analyse these for trends, to inform broader policy on Welsh medium provision. In such circumstances, further guidance should be sought from HEFCW.

The Council may seek information on the means by which proportions have been calculated, and will expect details of the methods to be retained and available to auditors if requested.

- f) The delivery should be subject to the normal process of quality assurance used within the institution.
- g) The assessment of the performance of the students pursuing the module follows the normal assessment processes of the institution.
- h) Provision where delivery is wholly through the medium of English but the student exercises the right to undertake assessment through the medium of Welsh is not eligible for premium funding.

## **SUBJECT ELIGIBILITY**

2 The following guidance should be noted in considering subject eligibility for premium funding.

- a) The premium is paid for enrolments onto courses where subjects other than Welsh language or literature are taught through the medium of Welsh, in recognition of the extra costs associated with preparing and delivering such provision.
- b) Welsh language and literature courses do not constitute Welsh medium provision under this definition. Generally, therefore, modules relating to Welsh language and Welsh literature will remain ineligible for Welsh medium premium funding. We consider that modules on creative writing taught through the medium of Welsh fall into this category.

We would expect, however, that the “percentage through Welsh” information is still completed for these modules on the HESA records.

- c) The following types of modules will be considered as eligible:
  - modules relating to the development of language skills such that students are enabled to operate in specific professional or subject contexts through the medium of Welsh.
  - modules for students which provide them with the terminology and concepts to deal their particular subject area in Welsh.
  - modules on the development of specific professional skills which are delivered through the medium of Welsh. Examples would include: modules delivered through the medium of Welsh on professional translation skills, administration skills, and mentoring skills.

Non-subject-specific language improvement or general “gloywi iaith” courses are likely to be deemed ineligible.

- d) As noted above, Welsh literature modules would normally be ineligible. However, it may be that such modules are sometimes used in programmes relating to Welsh history and culture as a means of addressing historical and cultural

aspects revealed by the literature. In these circumstances, the learning outcomes for students of Welsh language and literature should be different from those for students of Welsh history and culture. Although the delivery may be common, the different learning outcomes would imply different modules. Consequently, for those students of Welsh history and culture, such modules should be constructed, and coded, as modules of Welsh history or culture, rather than literature, and returned as delivered through the medium of Welsh as appropriate. Where such modules occur, we may seek further information on how they are tailored to meet the requirements of the students concerned.

- e) Modules that are Welsh language or literature must be coded on the HESA Records using JACS code Q560 or Q561, and not the higher level Celtic Studies code Q500. These modules will not be classed as eligible for Welsh medium premium funding and will be excluded from funding calculations. It is therefore important that institutions code module subject fields correctly to allow us to make judgements on what is and is not eligible for Welsh medium premium funding. If a module is coded with more than one subject and the main subject of the module is not coded as Welsh language or literature but a further subject is, this module could still be included in the premium calculations, but may be subject to manual exclusion.

### **DATA EXTRACTION AND CALCULATION OF WELSH MEDIUM PREMIUM FUNDING**

- 3 The following sets out guidance on recording Welsh medium data and how this is used to calculate premium funding.

- a) All data to be used in the calculation of funding for the Welsh Medium Premium for 2008/09 will be extracted from the 2006/07 HESA Student and Module Records according to guidance found in the Higher Education Data Requirements 2006/07 circular (W06/39HE Annex A para 31-33). Guidance relating to 2007/08 HESA data, that will be used to calculate 2009/10 funding, can be found in the Higher Education Data Requirements circular 2007/08 due to be published in September 2007. The Higher Education Data Requirements circular is updated annually and future publications will contain equivalent guidance for future years.

- b) Identification of provision through Welsh

#### *2006/07 HESA data*

Modules delivered wholly or partly through the medium of Welsh will be identified using the Module Identifier, MODID (field 5 of the HESA Module Record). Those modules with a letter W as the final character of the Module Identifier will be considered as being delivered wholly or partly through the medium of Welsh. The proportion of the module delivered through the medium of Welsh will be ascertained using MODPW (HESA Student Record fields 101-116).

#### *2007/08 HESA data*

Modules delivered wholly or partly through the medium of Welsh will be identified as those with Module Available in a Celtic Language field, MODLANG (returned in the Module entity of the HESA Student Record), equal to 1, Welsh. The proportion of the module delivered through the medium of Welsh will be ascertained using the Percentage of Module Taught in a Celtic Language field, LANGPCNT, returned on the Module entity of the HESA Student Record.

c) Identification of Welsh language and literature provision

*2006/07 HESA data*

Modules will be identified as being Welsh Language or Literature, where SBJ01 (HESA Module Record field 13) equals Q560 or Q561. Modules identified as such are excluded from the data extraction.

The first subject field (SBJ01) will be used to define the subject of the module for the purposes of the premium. Where SBJ01 is not coded Q560 or Q561, but one of the other subject fields on the HESA Module Record, SBJ02, SBJ03 or SBJ04, is coded Q560 or Q561, the module will not be excluded automatically from the extraction, but may be excluded manually. It is therefore important to code the SBJ01 field appropriately.

*2007/08 HESA data*

Modules will be identified as being Welsh Language or Literature where MODSBJ, returned on the Module entity of the HESA Student Record, equals Q560 or Q561. Modules identified as such are excluded from the data extraction.

Where a module is coded with more than one subject, the subject accounting for the largest percentage of provision, identified using MODSBJP on the Module entity of the HESA Student Record, will be used to decide whether the module is excluded on the basis of being Welsh language or literature. Where the subject accounting for the largest proportion of the module is not Welsh language or literature, but a smaller proportion is, the module will not be excluded automatically from the extraction, but may be excluded manually.

d) Determining how much of the module is delivered through the medium of Welsh

**Only modules that meet the minimum 2 credit value threshold will be counted in the calculation of the Welsh Medium premium.**

*2006/07 HESA data*

The value of MODPW and the credit value of the module, CRDTPTS (HESA module record field 9) will be used to calculate a notional credit volume delivered through the medium of Welsh.

**Credit volume delivered through Welsh = MODPW/100 x CRDTPTS**

*2007/08 HESA data*

The value of LANGPCNT and the credit value of the module, CRDTPTS (returned on the Module entity of the HESA Student Record) will be used to calculate a notional credit volume delivered through the medium of Welsh.

**Credit volume delivered through Welsh = LANGPCNT/100 x CRDTPTS**

e) Calculation of total notional credit volume through the medium of Welsh

The credit volume delivered through Welsh will be summed over all students to give the total notional credit volume delivered through the medium of Welsh per module.

f) Calculation of Welsh Medium Premium

The total notional credit volume delivered through the medium of Welsh is summarised by mode and level of study and by Academic Subject Category (ASC).

An average of the past two years' credit volume is used in the calculation of the premium. This average is multiplied by the unit of funding (UoF) for the ASC and the premium for Welsh medium funding is applied. The total amount of funding is calculated by summing over all modes, levels and ASCs to give a total amount per institution.

Funding is calculated by mode, level and ASC as:

**Funding = (total notional credit volume delivered through the medium of Welsh: year 1 + year 2) x 0.5 x UoF x premium**

For 2008/09 funding, year 1 and year 2 correspond to 2005/06 and 2006/07 respectively. For 2009/10 funding, year 1 and year 2 correspond to 2006/07 and 2007/08 respectively.

For 2007/08 funding, the premium applied was 0.34. Any changes to the premium for future funding calculations will be notified to institutions.