

Responses to Circular W10/26HE: Guidance on the Principles to Manage Full-time Undergraduate Student Numbers from 2011/12

In response to the above circular, we have received responses from 13 interested parties. Responses were sent by the following: National Union of Students Wales, Glyndŵr University, University of Glamorgan, Bangor University, Coleg Llandrillo, Swansea Metropolitan University, Swansea University, Cardiff University, Coleg Sir Gâr, Higher Education Wales, University of Wales, Newport, Aberystwyth University, University of Wales Institute, Cardiff and University of Wales, Trinity Saint David.

HEFCW would like to thank all respondents who took the time to respond to the above circular. This document summarises the consultation responses under the paragraph numbers and headings in the Circular.

Introductions

Various institutions made introductory comments, many of which recognised that the state of the public finances necessitate controls on student numbers. However, several also noted their concerns over the potential effects on attempts to widen access and increase retention. Institutions were also keen to ensure that the changes being contemplated were kept as simple as possible.

Paragraph 10. Establishing a baseline

Institutions generally accepted the need for a baseline, but there was a split in opinion amongst the sector concerning whether the baseline should be set using HESA, HESES or EYM data.

Paragraph 11. Control based on FT, fundable, UG new entrants

Again, institutions were generally content with these criteria. However, a number of issues were raised.

1. What types of students should be included in the cap?

Several institutions proposed that the cap should exclude certain categories of students that would appear to be included in the above criteria. Cases for exclusion were made for ITT, medical and dental, ESF, foundation degrees, full time UHOVI, widening access students, HNDs, allied health professionals and other externally funded students from the cap. Others asked whether the cap would only cover students who place a burden on the student support budget. There was also a concern that students converting their foundation degree or HND into a higher award would count as a new entrants.

2. New entrants or total student population?

Some respondents expressed their preference for managing the total number of students in their institution rather than the number of new entrants and

wished the cap to reflect the total full time numbers. Other respondents suggested that the cap should move to a total population target after a number of years. There was no consensus on this issue.

3. When would new entrants be measured?

In some cases institutions were concerned about when in the academic year the number of new entrants would be measured and whether it would include students who drop out during the year. It was suggested that the cap should measure the number of students at the end of each year so as not to penalise institutions that recruit significant numbers of widening access students who have a higher propensity to drop out.

4. What constitutes a full time student?

There was a request for further clarification on what constitutes a full time student.

Paragraph 12. Baseline as 2008/09 figures, taking into account fees only growth

Some respondents were not entirely clear as to the meaning of paragraph 12 and requested clarification before submitting responses. There was a significant divergence of opinion in this area.

In most cases there was broad agreement that the cap should take into account fees only growth since 2005/6 and not reward those who took no measures to restrict growth in line with caution urged by the funding council. There were notable exceptions to this position.

Some institutions were not content with the use of 2008/9 figures, putting forward various reasons for this, suggesting either that 2009/10 EYM figures should be used or that the cap should be based on a rolling average of recruitment across a number of years.

Other respondents were concerned that the use of 2008/9 figures would leave their institutions in an unsustainable position.

Paragraph 13. 1% level of tolerance

There was universal agreement amongst respondents that a tolerance level of 1% was too low. The sector predicted that a tolerance this small combined with stiff penalties would result in over-cautious admissions policies and significant under-recruitment.

Suggested alternative levels of tolerance ranged from 5% to 2%, with the vast majority content with a tolerance of 2%. Others also suggested a percentage tolerance or a number of students, whichever is higher. It was also suggested that the level of tolerance be adjusted downwards from a higher level as institutions become more practised at managing recruitment. Others supported the idea of an average tolerance over a number of years.

There was widespread concern that the cap should not penalise improved retention rates.

Paragraph 14. Level of penalty – economic cost of student support to Government

Several respondents requested greater clarity on the level of penalty, finding the band suggested in the circular too wide to be used for effective modelling. There was also a concern that the penalty would be punitive and not represent the net cost to WAG of student support. Other respondents suggested that the penalty should be set at the same level as in England or that the penalty should be set at the level of fee income from fees only students. One respondent suggested that over-recruitment should be penalised by a corresponding reduction in funded numbers in the next year; another respondent argued strongly against this idea.

Other comments

There were a range of further comments which represented specific interests and concerns within the sector.

- Council should ensure that those institutions who assisted in the reconfiguration of ITT (thereby transferring numbers from PG to UG) should not be disadvantaged.
- Institutions must be informed of their allocation by 30 September 2010 at the latest.
- The cap would hinder attempts to increase number of full-time learners/per capita in north and mid Wales.
- Reducing student numbers in some institutions would risk economic regeneration as it could place large projects at risk.
- Growth in STEM and Welsh medium provision should be protected as they represent WAG priorities and have been actively encouraged by HEFCW.
- One institution raised the concern that by penalising institutions that have grown faster than the sector, increased student numbers could be made available to those that cannot or do not want to grow.
- HEFCW should establish whether the number of Welsh domiciled students has increased; it was argued that it would be perverse for HEFCW/WAG to fine an institution and claim monies that do not relate to its devolved budget.
- Several institutions were concerned that the cap may have a negative impact on widening participation. It was suggested that the widening access premium be increased to prevent a swing away from poorer students.