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Llywodraeth Cymru  
Welsh Government

Welsh Government  
Consultation Response Form

Proposed changes to the student finance support  
package in the 2019/20 academic year

Date of issue: 19 December 2018  
Action required: Responses by 1 February 2019

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

# Proposed changes to the student finance support package in 2019/20 academic year

## Consultation response form

Your name:

Jane Johns

Organisation (if applicable):

Higher Education Funding Council for Wales

e-mail/telephone number:

[jane.johns@hefcw.ac.uk](mailto:jane.johns@hefcw.ac.uk)

Tel: 029 20859 732

Your address:

Higher Education Funding Council for Wales  
Tŷ Afon  
Bedwas Road  
Bedwas  
Caerphilly  
CF83 8WT

Responses should be returned by **1 February 2019** to

Higher Education Division  
Skills, Higher Education and Lifelong Learning Directorate  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

e-mail: [HEDConsultationsMailbox@gov.wales](mailto:HEDConsultationsMailbox@gov.wales)

## Our questions

1. Do you agree that a new residency category for individuals granted leave to remain under Section 67 of the Immigration Act 2016 should be added to the regulations, to enable them to be eligible students for the purpose of student support?

*We support the proposals to allow persons granted leave to remain under 67 of the Immigration Act 2016 to be eligible students for the purpose of student support.*

*We have set out our commitment to work with Welsh Government, institutions and partners to: identify opportunities to engage with refugees and asylum seekers and reduce barriers to education; audit and publish practice on supporting refugees and asylum seekers in our Widening Access Programme of Action, recently submitted to the Cabinet Secretary for Education.*

2. Do you agree to the proposed changes for the designation of courses in England?

*We recognise the practical reasons for making these changes. We also recognise the importance of reciprocal arrangements for designation of courses across the UK by each administration in the UK. The ability of higher education institutions in Wales to recruit students domiciled in other nations of the UK is fundamental to supporting a sustainable sector in Wales. We are therefore supportive of the proposed changes on the basis that they should ensure that reciprocal arrangements are secured for the designation by other UK Government Ministers of courses at HE providers in Wales.*

*The quality thresholds for regulation in Wales are different to those in England: this includes the fact that in Wales we have maintained cyclical external quality assurance reviews by a body on the European Quality Assurance Register (Universities in Wales have contracted to take these from the QAA). In England cyclical external quality assurance reviews have been removed. This means that institutions in England will be able to meet the standards for approved (fee cap) registration by the Office for Students, whereas they would not meet the quality requirements for regulation in Wales. This will increase the number of private non-charitable providers in England that will have their courses automatically designated for student support from the Welsh Government. This differs from the policy position in Wales but we recognise that it will not be possible in future to distinguish between those private providers and the previously publicly funded charitable*

*institutions that have historically had courses automatically designated for student support from Welsh Government.*

*While we agree that it is important to ensure continued reciprocal arrangements for the designation of courses across the UK, it is also important for Welsh Government to be aware that the quality regulatory requirements in England are different to Wales. This brings some potential risk in terms of the use of public funding, as institutions in England will be designated by Wales in a context where they would not have been under the previous quality regime in England, and would not meet the requirements were they based in Wales. We cannot see any means of avoiding this, as cross-border recruitment benefits Welsh institutions and Welsh domiciled students and therefore it is important to maintain reciprocal designation arrangements.*

3. Please explain what, if any, impact you believe the proposed policy would have on opportunities for persons to use the Welsh language and on treating it no less favourably than the English language. In particular:
  - any positive or adverse effects of the proposed policy;
  - how the policy could be formulated or revised so that it would not have any adverse effects or so that it would have decreased adverse effects; and
  - how the policy could be formulated or revised so that it would have positive or increased positive effects.
  
4. Are there any other issues about our proposal that you would like to raise?

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: