

## Cylchlythyr | Circular

# COVID-19 impact on higher education providers: funding, regulation and reporting implications

**Date:** 04 May 2020  
**Reference:** W20/11HE  
**To:** Heads of higher education institutions in Wales  
Principals of directly-funded further education colleges in Wales  
**Response by:** No response required  
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This circular outlines steps that HEFCW is taking to reduce the regulatory burden on higher education (HE) providers in Wales (universities and, where applicable, regulated and/or funded FE colleges).

It also provides information about future actions and requirements in a number of other areas, such as funding and strategies.

If you require this document in an alternative accessible format, please email [info@hefcw.ac.uk](mailto:info@hefcw.ac.uk).



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## **Introduction**

1. This circular outlines steps that HEFCW is taking to reduce the regulatory burden on higher education (HE) providers in Wales (universities and, where applicable, regulated and/or funded FE colleges).
2. It also provides information about future actions and requirements in a number of other areas, such as funding and strategies.

## **Context**

3. In order to support higher education (HE), we are reprioritising our activities, working with Welsh Government and other stakeholders to help secure the financial health and sustainability of all higher education providers.
4. This includes work to assist them in accessing funding, where available. This will allow them to continue to provide their support and expertise during this period of crisis, and to continue to operate for the benefit of their students, their local communities, NHS Wales, the economy, and the nation as a whole. It will also help providers in their contribution to addressing inequalities, reskilling the workforce, and continuing research to meet future challenges.

## **Proposed Action**

5. We are seeking to reduce significantly the regulatory burden on higher education providers (universities and, where applicable, regulated and/or funded FE Colleges). This includes amending our Fee and Access Planning process, and postponing certain other requirements to give providers the space to deal with the current crisis.
6. We will continue to engage with providers in such a way that we can continue to be informed of specific pressures and ongoing activity. We will ensure that the statutory regulatory relationship and related accountabilities remain in place, but in a way that minimises the distraction of provider staff from their operational priorities at this time.
7. While we are currently adopting a lighter touch approach to most regulatory processes, we recognise that this is a time where operational responsiveness and effective governance are critical. Reducing the reporting required by providers should provide more time for governing bodies to prioritise their time on the key risks facing their institutions. We expect that providers continue to maintain effective governance and management processes (including adherence to Charity Commission regulations), and that significant failures or issues will continue to be reported to us in line with our existing policies.

8. The actions we are currently taking are listed in **Annex A**. Further information on data submissions and data audits is provided at **Annex B**. A number of the proposed actions in **Annex A** require approval by the Welsh Government. We have sought that approval and are awaiting a definitive position. We will keep all of this under review, including - in relation to our regulatory function – in discussion with Welsh Government, and we will continue to engage with providers ahead of any further formal update.

### **Timetable**

9. The revised requirements set out in this circular will remain in place until further notice, subject to formal regular review and approval by HEFCW's Council.
10. We will amend our requirements as the situation changes and as our understanding develops of the position of the sector and of individual providers.
11. When normal arrangements return we will work jointly with each higher education provider to review and evaluate any regulatory or other issues of material effect that have emerged during this exceptional period, in order to capture and address any necessary correcting actions. We will report on the operation of the special arrangements in our annual regulatory report to Welsh Government.

### **Further information**

12. Contact Alyson Thomas (029 2085 9711, [alyson.thomas@hefcw.ac.uk](mailto:alyson.thomas@hefcw.ac.uk)) or Ewen Brierley (029 2085 9713, [ewen.brierley@hefcw.ac.uk](mailto:ewen.brierley@hefcw.ac.uk)).

### **Assessing the impact of our policies**

13. We will carry out impact assessments to help safeguard against discrimination and promote equality. We will also consider the impact of policies on the Welsh language, and Welsh language provision within the HE sector in Wales, and potential impacts towards the goals set out in the Well-Being of Future Generations (Wales) Act 2015 including our Well-Being Objectives. Contact [equality@hefcw.ac.uk](mailto:equality@hefcw.ac.uk) for more information about impact assessments. We will update any guidance as required in the light of mitigatable negative impact on the above. Providers are expected to continue to take account of their own duties in these areas, and should alert HEFCW to any concerns about the negative impact of the crisis on protected characteristic groups and the Welsh language.

<b>General principles</b>			
<b>What</b>	<b>How</b>	<b>Who</b>	<b>When</b>
<p>HEFCW, along with Universities Wales and Welsh Government, has been engaging and working with higher education providers on the impact of the COVID-19 pandemic on their institution, staff and students.</p> <p>We are aware that we need to re-assess our priorities, particularly when it comes to the weight of regulation. We anticipate agreed flexibility around Fee and Access Planning, and other regulatory processes, including requests for data and information.</p> <p>We are continuing discussions with all policy leads in higher education providers, conscious that lighter touch formal reporting can be balanced by regular engagement with key contacts.</p> <p>We continue to discuss the details of these processes with Welsh Government, Universities Wales and providers, and will keep providers updated accordingly.</p>			
<ul style="list-style-type: none"> <li>• Consultations</li> </ul>	<ul style="list-style-type: none"> <li>• We will not take forward any new HEFCW consultations or significant changes at this time.</li> </ul>	HEFCW	April – July 2020
<ul style="list-style-type: none"> <li>• Provision of guidance</li> </ul>	<ul style="list-style-type: none"> <li>• We will engage with HE providers before issuing any guidance so that timing may be optimised.</li> </ul>	HEFCW	Ongoing
<ul style="list-style-type: none"> <li>• Project monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• We will be flexible in our approach to monitoring arrangements and reporting requirements for existing funded projects, and we will liaise with institutions regarding requirements.</li> </ul>	HEFCW	Ongoing
<ul style="list-style-type: none"> <li>• Institutional visits (Council visits)</li> </ul>	<ul style="list-style-type: none"> <li>• We have cancelled our proposed institutional visit to Aberystwyth University in July, and all other institutional visits are subject to postponement.</li> </ul>	HEFCW	From July 2020

General principles			
What	How	Who	When
<ul style="list-style-type: none"> <li>Emergency legislation</li> </ul>	<ul style="list-style-type: none"> <li>We will liaise with Welsh Government regarding any requirements of the Emergency Legislation, and will brief HE providers accordingly.</li> </ul>	HEFCW, Welsh Government and HE providers	April 2020

Funding			
What	How	Who	When
<ul style="list-style-type: none"> <li>Allocating HEFCW AY 2020/21 recurrent funding</li> </ul>	<p>Our provisional <a href="#">budget and funding letter</a> from Welsh Government for 2020-21 has now been published. Accordingly:</p> <ul style="list-style-type: none"> <li>We will inform HE providers of the proposed high-level funding allocations ('headline steers') for AY 2020/21 based on consultations already completed. The proposed funding allocations will be subject to checking, so there may be some adjustments at a later date.</li> <li>We aim to publish the funding allocation for AY 2020/21 after our July 2020 Council meeting.</li> <li>We will delay implementation of the outcomes of the proposed <a href="#">review of our teaching funding methodologies</a> until 2021/22, to take effect in 2022/23. The teaching funding</li> </ul>	Welsh Government and HEFCW	<p>Headline steer to providers: by end May 2020</p> <p>Publish funding allocation circular by end July 2020</p>

Funding			
What	How	Who	When
	<p>review will include our part-time funding methodologies and will take account of the outcomes of our recent review of part-time provision in Wales, undertaken on our behalf by OB3 Research. We intend to publish the report, along with our responses to the recommendations of the report, in May 2020, but this is subject to review.</p>		
<ul style="list-style-type: none"> <li>Recurrent Quality Research (QR) funding</li> </ul>	<ul style="list-style-type: none"> <li>Our planned review of the QR funding formula ahead of the next REF for implementation in 2022/23 academic year may be subject to associated delay related to the postponement of REF submissions.</li> </ul>		
<ul style="list-style-type: none"> <li>Funding Degree Apprenticeships</li> </ul>	<ul style="list-style-type: none"> <li>Welsh Government to engage with HEFCW to assess the impact of COVID-19 on funding the Degree Apprenticeship pilot programme (2018/19 to 2020/21), and to discuss extending the current pilot programme beyond March 2021.</li> </ul>	Welsh Government and HEFCW	May 2020
<ul style="list-style-type: none"> <li>Confirming bursary funding</li> </ul>	<ul style="list-style-type: none"> <li>Welsh Government to engage with HEFCW to confirm the arrangements to continue bursary funding for 2020/21.</li> </ul>	Welsh Government and HEFCW	May 2020
<ul style="list-style-type: none"> <li>Confirming innovation and engagement funding</li> </ul>	<ul style="list-style-type: none"> <li>Published in <a href="#">HEFCW circular W20/09HE</a>.</li> </ul>	HEFCW	April 2020

Funding			
What	How	Who	When
<ul style="list-style-type: none"> <li>Allocating estates funding and research capital funding</li> </ul>	<ul style="list-style-type: none"> <li>We will provide project extensions for the completion of expenditure against 2019/20 <b>estates capital funding</b> to allow for slippage and to avoid clawback.</li> <li>For 2019/20 <b>research capital funding</b>, we will liaise with UK and Welsh Governments regarding the potential for extending the timescale for submission of expenditure returns to allow for slippage in expenditure. We will inform HE providers of the outcome of those discussions.</li> </ul>	HEFCW, Welsh Government and BEIS (UK Gov Dept for Business, Energy & Industrial Strategy)	April 2020
<ul style="list-style-type: none"> <li>Providing funding to address cash flow challenges</li> </ul>	<ul style="list-style-type: none"> <li>Subject to any changes to our funding letter, we will engage with universities, where appropriate and possible, to re-profile grant payments or to provide repayable grants to support cash flow management.</li> <li>Welsh Government to suspend current approval and notification requirements placed on HEFCW before it undertakes any grant-in-aid reprofiling or agrees to provide repayable grants.</li> </ul>	HEFCW  Welsh Government	Ongoing  May 2020

Financial			
What	How	Who	When
<ul style="list-style-type: none"> <li>Monitoring each HE provider's cash flow position</li> </ul>	<ul style="list-style-type: none"> <li>We will meet with each Finance Director, with the frequency of these meetings decided by HEFCW.</li> <li>Recognising the speed of changing assumptions, we will ask HE providers to provide cash flow forecasts to inform our briefings to Welsh Government. We will keep these to a minimum. We will brief Welsh Government on the financial position of the sector and developments.</li> </ul>	HEFCW and HE providers	From April 2020
<ul style="list-style-type: none"> <li>Reducing the burden of Financial Management Code requirements</li> </ul>	<ul style="list-style-type: none"> <li>We will consider how the requirements of the Financial Management Code may be monitored and enforced in a pragmatic manner, taking account of the current context.</li> </ul>	HEFCW	May 2020
<ul style="list-style-type: none"> <li>Reducing the burden of financial forecast submissions</li> </ul>	<ul style="list-style-type: none"> <li>Financial forecasts submitted in the required HEFCW format involve a significant workload, and a long-term five-year forecast is of questionable value given the current uncertainties. We will reconsider our requirement for long-term five-year financial forecasts and instead focus on immediate financial viability issues with a shorter-term forecast. This may involve more frequent but different reporting potentially in a format that institutions use in internal reporting. The forecast requirements will be agreed in consultation with the university Finance Directors group.</li> </ul>	HEFCW and HE providers	May 2020



Financial			
What	How	Who	When
	<ul style="list-style-type: none"> <li>We will lead on work to identify impact of COVID-19 on institutions' financial position and actions required to support their financial sustainability.</li> </ul>		
<ul style="list-style-type: none"> <li>Supporting HE providers on UK Government (Treasury) measures, including Coronavirus Job Retention Scheme and loans available for HE providers and their subsidiaries</li> </ul>	<ul style="list-style-type: none"> <li>Welsh Government to confirm with UK Government the applicability of the various support measures to providers and their subsidiaries, including for contracted staff.</li> <li>Welsh Government to inform HEFCW and Welsh providers regarding the applicability of the UK Government schemes and the application processes.</li> <li>We will support providers as necessary with relevant application processes.</li> </ul>	Welsh Government, HEFCW and HE providers. HE providers to involve trade unions	April - May 2020
<ul style="list-style-type: none"> <li>Ensuring Student Loans Company (SLC) payments are made in full in May 2020</li> </ul>	<ul style="list-style-type: none"> <li>Welsh Government to confirm with the SLC and other UK stakeholders the SLC's capacity to make timely payments.</li> <li>Welsh Government to keep HEFCW updated regarding progress of May 2020 SLC payments.</li> </ul>	Welsh Government and SLC	April – May 2020
<ul style="list-style-type: none"> <li>Re-profiling SLC payments to institutions for 2020/21</li> </ul>	<ul style="list-style-type: none"> <li>Welsh Government to engage with the SLC and other UK stakeholders about re-profiling SLC payments.</li> <li>Welsh Government to keep HEFCW updated about SLC payments.</li> </ul>	Welsh Government and SLC	April – August 2020

Financial			
What	How	Who	When
<ul style="list-style-type: none"> <li>Supporting HE providers on bank loan facilities</li> </ul>	<ul style="list-style-type: none"> <li>We will support HE providers in discussions with banks relating to existing facilities, or increasing and entering into new loan facilities where that is in the best interest of the university. Any decisions on changes to loan facilities will remain the responsibility of the university and its governing body.</li> </ul>	HEFCW and HE providers	Ongoing
<ul style="list-style-type: none"> <li>Guiding providers with specific designation</li> </ul>	<ul style="list-style-type: none"> <li>We do not have the capacity to assess and report to Welsh Government on how providers with specifically designated courses are planning, financially, to respond to the current crisis.</li> <li>Welsh Government to review urgently specific course designation, in view of the impact of COVID-19.</li> <li>Welsh Government to work with HEFCW and give further guidance on how to proceed in the current context.</li> </ul>	Welsh Government	April 2020
<ul style="list-style-type: none"> <li>Postponing clawback in respect of part-time credit delivery</li> </ul>	<ul style="list-style-type: none"> <li>We will postpone any decision on clawback of funding from 2018/19 or relating to under-recruitment in 2019/20.</li> <li>We will review the part-time credit position and clawback options with respect to 2018/19 and 2019/20 by March 2021.</li> </ul>	HEFCW	April 2020  March 2021

<b>Financial</b>			
What	How	Who	When
<ul style="list-style-type: none"> <li>Reducing the burden on finance teams by relaxing the timescale for submitting audited accounts</li> </ul>	<ul style="list-style-type: none"> <li>We will liaise with other UK stakeholders to consider relaxing the submission timescale for audited accounts.</li> <li>We will delay our Accounts Direction pending clarity.</li> </ul>	HEFCW, Charity Commission, UK Funding Bodies and HE providers	March-December 2020
<ul style="list-style-type: none"> <li>Transparency Statements</li> </ul>	<ul style="list-style-type: none"> <li>We will accept a delayed return of 2018/19 Transparency Statements from 31 March 2020.</li> <li>2019/20 Transparency Statements are likely to be required but normal deadlines may not apply.</li> </ul>	HE providers and HEFCW	March-December 2020

<b>Audit</b>			
What	How	Who	When
<ul style="list-style-type: none"> <li>Reducing the burden of internal and external HE Data audits</li> </ul>	<p><b>Internal audit</b></p> <ul style="list-style-type: none"> <li>We will relax the requirement for an annual data systems and processes internal audit report by extending the deadline from June 2020 to June 2021.</li> <li>This means that only one report is required relating to the period June 2019 to June 2021, which can be done at any point during that period.</li> </ul>	HEFCW	April 2020

<b>Audit</b>			
What	How	Who	When
	<ul style="list-style-type: none"> <li>Providers can submit at any point up to June 2021.</li> </ul> <p><b>External audit</b></p> <ul style="list-style-type: none"> <li>We will move the annual external audit to later in the year for the 2020/21 set of audits so that they take place after March 2021 instead of in the autumn 2020.</li> </ul>		

<b>Regulatory</b>			
What	How	Who	When
<ul style="list-style-type: none"> <li>Reducing the burden of equalities and pay gap reporting</li> </ul>	<ul style="list-style-type: none"> <li>Welsh Government to consider working with the EHRC and other UK governments to relax equalities reporting requirements for a defined period. Gender pay gap reporting requirements have already been put on hold.</li> </ul>	Welsh Government, EHRC other UK gov'ts and funding bodies, and HEFCW	April 2020
<ul style="list-style-type: none"> <li>Reducing the burden of the Fee and Access Plan process</li> </ul>	<p><b>Fee and Access Plan approval 2021/22</b></p> <ul style="list-style-type: none"> <li>We intend to approve the 2021/22 Fee and Access Plans recently submitted, where they either specify or determine the fee levels to be charged in 2021/22, and set objectives</li> </ul>	HEFCW, Welsh Government, HE providers	April 2020 – March 2022

Regulatory			
What	How	Who	When
	<p>and outline activities to improve equality of opportunity and promote higher education. Given the current circumstances, we do not anticipate institutions being able to detail what activities and services they will deliver to meet those objectives, what fee income they will receive or set meaningful targets to measure the success of their objectives. As such, we will expect institutions to publish only the section of the Fee and Access Plan related to fee levels. We will, over the coming year, have discussions with institutions regarding their plans for delivering activities and services in 2021/22 with the view to institutions possibly varying their plans at a later date to confirm their intentions.</p> <p><b>Fee and Access Plan monitoring for 2018/19</b></p> <ul style="list-style-type: none"> <li>We do not require any further information from institutions to inform our monitoring and evaluation of 2018/19 Fee and Access Plans. Our assessment of the effectiveness of plans will inform conversations with individual institutions at an appropriate time.</li> </ul> <p><b>Fee and Access Plan monitoring for 2019/20</b></p> <ul style="list-style-type: none"> <li>We intend to amend significantly our process for monitoring and evaluating the 2019/20 Fee and Access Plans, resulting in institutions not being asked to make a formal submission as they ordinarily would. We will assess</li> </ul>		

Regulatory			
What	How	Who	When
	<p>compliance with Fee and Access Plans informed by discussions with institutions over the coming year. We will discuss our assessment with institutions before it is reported formally to Welsh Government in our annual regulatory report.</p> <p><b>Fee and Access Plan monitoring for 2020/21</b></p> <ul style="list-style-type: none"> <li>We recognise that the current crisis will affect the delivery of commitments set out in the 2020/21 Fee and Access Plan and we will keep this process under review as the impact of the crisis becomes clearer, communicating this to the sector in due course.</li> <li>We will keep Welsh Government updated on changes to our processes, recognising that the consequences of these changes will impact on the contents of future annual regulatory reports.</li> </ul>		
<ul style="list-style-type: none"> <li>Reducing the burden of data returns</li> </ul>	<ul style="list-style-type: none"> <li>We will take wider decisions on data returns involving HESA (the UK Higher Education Statistics Agency) in consultation with other UK funding bodies and UK provider representatives.</li> <li>We will discuss other UK wide returns, including those submitted via OfS (the Office for Students) with the relevant UK bodies to make decisions on postponing,</li> </ul>	HEFCW, other funding bodies, providers and HESA	April 2020 - March 2021

Regulatory			
What	How	Who	When
	<p>reducing the requirements of or temporarily ceasing data collections.</p> <ul style="list-style-type: none"> <li>We will review our current data collections and verification processes for the next 12 months with a view to temporarily ceasing collection, postponing collection of or reducing reporting and monitoring requirements as appropriate. This will be affected by the amended arrangements for the collection of HESA data. Proposals will be discussed with providers.</li> <li>We will not make data requests in the period April 2020 to July 2020 other than those needed for monitoring and informing discussions about financial viability.</li> <li>More information is at <b>Annex B</b>.</li> </ul>		
<ul style="list-style-type: none"> <li>Reducing the burden of HEFCW's Institutional Assurance processes</li> </ul>	<ul style="list-style-type: none"> <li>We will defer institutional Assurance Review visits. We will postpone the planned Institutional Assurance Review visit to Aberystwyth University to late 2020 / early 2021, and the visit to Bangor University from January 2021 to mid-2021.</li> <li>We will run the Annual Assurance Return process in October, or possibly later, taking a light touch and flexible approach on assurance sources, audit, and so on, noting that the current circumstances might impact on HE</li> </ul>	HEFCW and HE providers	April 2020 – March 2021

Regulatory			
What	How	Who	When
	<p>providers' ability to undertake assurance work. This process will be used to monitor the delivery of the Review of <a href="#">Governance of the Universities in Wales</a> (Camm Governance Review) actions by institutions, recognising that the current circumstances are likely to have impacted on progress.</p> <ul style="list-style-type: none"> <li>We will continue to run other monitoring processes in respect of complaints about institutions, incident reporting and action plans, taking into account the context against which complaints are made and in line with guidance from the Office of the Independent Adjudicator in respect to the pandemic.</li> </ul>		
<ul style="list-style-type: none"> <li>Maintaining a rigorous focus on financial health of the sector while reducing the burden of Institutional Risk Review process on institutions</li> </ul>	<ul style="list-style-type: none"> <li>We will run our internal Institutional Risk Review (IRR) process, due May-June 2020, as this provides a helpful means of capturing data and intelligence on institutions. However, we will not issue IRR letters to universities this year.</li> </ul>	HEFCW	May 2020 – December 2020
<ul style="list-style-type: none"> <li>Seeking to reduce burden of Prevent processes, where</li> </ul>	<ul style="list-style-type: none"> <li>We will continue Prevent activities in line with Home Office's expectations of our delegated authority. We will</li> </ul>	HEFCW, Home Office, HE providers	From April 2020



Regulatory			
What	How	Who	When
possible, while maintaining appropriate monitoring	<p>modify processes, where possible and practical, to ensure that this can be achieved with minimum burden.</p> <ul style="list-style-type: none"> <li>We will maintain contact with Prevent co-ordinators and Prevent partners remotely.</li> </ul>	and other Relevant Higher Education Bodies (RHEBs)s in Wales	
<ul style="list-style-type: none"> <li>Postponing governor development training sessions</li> </ul>	<ul style="list-style-type: none"> <li>Advance HE to liaise with institutions and HEFCW regarding the rescheduling of governor development training sessions for convenient dates later in 2020 or early 2021.</li> <li>Advance HE and HEFCW to deliver sessions by March 2021 if possible.</li> </ul>	Advance HE, HEFCW and HE providers	April 2020 – March 2021
<ul style="list-style-type: none"> <li>Revising HEFCW Terms and Conditions of Funding</li> </ul>	<ul style="list-style-type: none"> <li>We have drafted revised Terms and Conditions of Funding (T&amp;C) to sit alongside the Financial Management Code (FMC) and replace the Memorandum of Assurance and Accountability (MAA). The T&amp;C aims to remove the duplication between the MAA and the FMC.</li> <li>We intended to consult on the T&amp;C in the spring 2020, with the aim of the T&amp;C being implemented for the 2020/21 financial year. We will defer this consultation, with the aim of the T&amp;C being implemented for the 2021/22 financial year.</li> </ul>	HEFCW	April 2020 – July 2021

Regulatory			
What	How	Who	When
	<ul style="list-style-type: none"> <li>The MAA and FMC will continue in their current form until the T&amp;C replaces the MAA.</li> </ul>		
<ul style="list-style-type: none"> <li>Reviewing quality in universities</li> </ul>	<ul style="list-style-type: none"> <li>We have agreed with QAA (the Quality Assurance Agency for Higher Education) that remaining institutional quality enhancement reviews scheduled to take place in 2019/20 will be deferred until 2020/21.</li> <li>HE providers will need to continue to report to HEFCW where they think there is reason to believe that the quality of provision is inadequate or likely to become inadequate as identified through their own processes including via complaints. This must be treated as a notifiable event, with HEFCW informed as soon as possible.</li> <li>We would expect HE providers to continue to liaise with their Students' Unions, and to mitigate the impact on the student experience, and student mental health, as far as is possible.</li> <li>Institutions scheduled for quality enhancement review in 2020/21 that would struggle to engage effectively due to the disruption in 2019/20, should contact us to see if timescales can be adjusted.</li> </ul>	HEFCW and HE providers	Ongoing

Regulatory			
What	How	Who	When
<ul style="list-style-type: none"> <li>Extending the timescales for completing the <a href="#">Review of Governance of the Universities in Wales</a> ('Camm Governance Review') actions</li> </ul>	<ul style="list-style-type: none"> <li>HE providers to prioritise actions that can be taken forward in the current circumstances.</li> <li>We will extend timescales for completion of Camm Governance Review actions.</li> </ul>	HEFCW and HE providers	From April 2020

Quality, Learning, teaching and students			
What	How	Who	When
<p>We are liaising with NUS Wales and with Students' Unions to ensure that we are aware of any concerns about the arrangements put in place by regulated institutions or by potential effects on the student experience caused by the COVID-19 pandemic more generally, so that we can take action or provide guidance as appropriate.</p> <p>Our updated student charter guidance published in 2017 included a requirement to include a high level statement (or a link to one) on how the student interests are protected, eg in cases where a course or institution ceases to exist:</p> <p style="padding-left: 40px;">“The University will service its contractual obligations to students and comply with its commitments under consumer law as outlined by the Competition and Markets Authority. In doing so, universities will work to protect the student interest when responding to circumstances such as significant changes to how a course is delivered or course closure. The university has in place procedures to respond to these</p>			

Quality, Learning, teaching and students			
What	How	Who	When
<p>circumstances which will mitigate the potential impact on students and which recognise the different needs of its diverse student body.”</p> <p>Standards fall under institutional autonomy, but any problems arising from failure to maintain standards will fall under HEFCW’s statutory duties regarding quality. Therefore, in terms of quality, we expect that providers will make all reasonable efforts to enable:</p> <ul style="list-style-type: none"> <li>• students to complete their studies</li> <li>• achievement to be reliably assessed</li> <li>• qualifications to be awarded securely, and</li> <li>• maintenance of a fair and robust admissions process for entrants.</li> </ul> <p>We recognise that providers have already started making these arrangements. Providers should be careful to record decision-making in these areas, so that there is a clear audit trail, should any queries about quality or standards be raised retrospectively. We expect regulated providers to be mindful of sub-contractual responsibilities, where these exist, and including overseas arrangements, to ensure that appropriate quality is maintained for all provision for which they are the awarding body.</p>			
<ul style="list-style-type: none"> <li>• Quality of provision</li> </ul>	<ul style="list-style-type: none"> <li>• We expect regulated institutions to continue to adhere to the expectations, and core and common practices of the Quality Code for higher education, recognising that these may be delivered differently in light of the current pandemic.</li> <li>• We expect providers to maintain the integrity of their awards at all levels of undergraduate and postgraduate provision, including under sub-contractual arrangements. This means that where there has been disruption to study, the provider</li> </ul>	HE providers	Ongoing

Quality, Learning, teaching and students			
What	How	Who	When
	<p>will need to be confident that the learning outcomes have been met to enable awarding of the qualification. Providers should also be confident that the student has achieved the characteristics of the relevant qualification statement.</p> <ul style="list-style-type: none"> <li>• The Quality Assurance Agency for Higher Education (QAA) is publishing <a href="#">guidance on maintaining quality and standards</a> in this difficult time – we have drawn this to the attention of providers, recognising that they have been working on these areas in advance of any guidance being published. We will continue to share additional guidance as it is published.</li> <li>• We expect providers to engage with any professional, statutory or regulatory bodies (PSRBs) that accredit their courses, and we assume that the PSRBs will be liaising with providers on a UK-wide level. This will ensure that standards are maintained across the UK in the wide range of courses accredited by these bodies.</li> <li>• We recognise that all providers have different academic regulations. However, we encourage institutions to work collectively to communicate how they are all individually and collectively protecting the standards of provision.</li> </ul>		
<ul style="list-style-type: none"> <li>• Protecting students</li> </ul>	<ul style="list-style-type: none"> <li>• We expect providers to continue to protect the interests of students at all levels and locations in line with the statement</li> </ul>	HE providers	Ongoing

Quality, Learning, teaching and students			
What	How	Who	When
	<p>above, including in making sure that they are able to complete the current academic year.</p> <ul style="list-style-type: none"> <li>We are not asking for further information about how providers are doing this at present.</li> <li>We do not consider that there is a need to revise the Student Charter guidance this year, and will only update it when it is necessary. We will review our position in 2020/21 and we will contact institutions to determine whether any revisions will be needed in the future.</li> </ul>		
<ul style="list-style-type: none"> <li>Enhancing the student experience</li> </ul>	<ul style="list-style-type: none"> <li>We expect providers to communicate clearly and regularly with students about changes made to delivery of provision, assessment and feedback, including changes to the reporting of extenuating circumstances.</li> <li>We expect providers to engage with the students' union (and, where applicable, other student representatives) in order to identify and address any issues as they arise.</li> <li>Providers will need to ensure that they provide appropriate support, taking account of the varying needs of the diverse student body.</li> </ul>	HE providers	Ongoing

Quality, Learning, teaching and students			
What	How	Who	When
	<ul style="list-style-type: none"> <li>We expect providers to take appropriate action to support students studying through the medium of Welsh, to ensure that they continue to have access to Welsh medium resources and support as far as possible. QAA's guidance on <i>Effective Practice in Examining and Assessing in Welsh within Wales</i> is available on the <a href="#">QAA website</a>.</li> </ul>		
<ul style="list-style-type: none"> <li>Student complaints and appeals</li> </ul>	<ul style="list-style-type: none"> <li>We expect that processes for complaints and appeals will continue as normal. The Office of the Independent Adjudicator for Higher Education (OIA) has published guidance for providers on possible areas for complaints arising from the response of institutions to the COVID-19 pandemic. Students will continue to have the ability to appeal to the OIA should they be unhappy with the outcomes of any complaints or appeals procedures, once they have received their Completion of Procedures letter.</li> <li>Institutions should also ensure that there is an appropriate level of signposting on their websites to <a href="#">HEFCW's complaints procedures</a>.</li> </ul>	HE providers	Ongoing
<ul style="list-style-type: none"> <li>Implementing a moratorium on HE full-time undergraduate university admissions</li> </ul>	<ul style="list-style-type: none"> <li>Welsh Government is working with UCAS and HEFCW to monitor the situation closely. As work is underway to ensure that students receive fair grades that recognise their work, the current view is that the usual admissions cycle should not be disrupted, and therefore different</li> </ul>	HEFCW, HE providers	Until 4 May 2020

Quality, Learning, teaching and students			
What	How	Who	When
offers and acceptances	<p>behaviours by institutions in relation to offers are not required. Higher education providers in Wales are expected to take account of any new UK-wide agreed admissions protocols when making offers to applicants.</p> <ul style="list-style-type: none"> <li>• Welsh Government has stated that applicants should not feel pressured to accept any offers and have tasked higher education providers to refrain from making unconditional offers to applicants undertaking qualifications that have yet to be awarded, until 4 May.</li> <li>• We will monitor institutional performance and evaluate behaviour in relation to admissions to Welsh institutions, and will expect institutions to comply with any sector-wide approach agreed.</li> <li>• More information: <a href="https://gov.wales/higher-education-and-student-support-coronavirus">https://gov.wales/higher-education-and-student-support-coronavirus</a>.</li> </ul>		
<ul style="list-style-type: none"> <li>• Carrying out the National Student Survey (NSS)</li> </ul>	<ul style="list-style-type: none"> <li>• The UK funders and regulators agreed that the NSS should continue, as at the time of institutional closures the telephone survey phase had been reached. We clarified that we had no expectation that institutions promote the NSS further, in the circumstances.</li> <li>• The Office for Students (OfS) is liaising with Ipsos MORI to check how students feel about being asked to participate.</li> </ul>	UK HE funders and regulators	Ongoing to July 2020



Quality, Learning, teaching and students			
What	How	Who	When
	<p>Feedback has been that students wanted to respond and were keen to provide their views.</p> <ul style="list-style-type: none"> <li>• The UK funders and regulators agreed that OfS would continue to monitor this with Ipsos, with the proviso that negative feedback from students could have triggered early termination of the survey.</li> <li>• The funders and regulators have considered issues regarding validity of responses pre- and post-COVID-19, and agreed there are concerns around this. The OfS statistics team will test the results to see if there is any significant difference between the responses pre and post COVID-19 closures.</li> <li>• The four funding/regulatory bodies will consider the results in depth once available, and will carry out some form of consultation with providers across all countries regarding what would be the most appropriate in terms of publication. We will liaise with participating Welsh institutions.</li> <li>• We recognise that institutions also carry out a range of other surveys, both internal and external, to capture the student voice. We recognise that providers might need to seek other ways of achieving this feedback, which might include deferring activity until 2020/21.</li> </ul>		

<b>Quality, Learning, teaching and students</b>			
What	How	Who	When
<ul style="list-style-type: none"> <li>Implementing the Teaching Excellence and student outcomes Framework (TEF)</li> </ul>	<ul style="list-style-type: none"> <li>The Office for Students (OfS) was previously planning to develop and consult on a new framework for the TEF during the first half of 2020. The impact of the coronavirus crisis means that they do not currently have a date for the next TEF exercise. We will continue to liaise with them and provide further information as soon as we can.</li> <li>We understand that they intend to consult on the future TEF scheme after the UK government has published the Independent Review and its response to the Review's recommendations.</li> <li>Publication of the subject-level TEF pilot reports has been delayed.</li> </ul>	Office for Students, UK Government	Ongoing

<b>Widening access and inclusion</b>			
What	How	Who	When
<ul style="list-style-type: none"> <li>Reporting on Reaching Wider Programme</li> </ul>	<ul style="list-style-type: none"> <li>We will keep under review the deadline for reporting on Reaching Wider Partnerships, currently May 2020.</li> <li>We have delayed institutional Reaching Wider Programme monitoring of 2018/19 plans until further notice.</li> </ul>	HEFCW	<p>Ongoing</p> <p>Ongoing</p>

<b>Widening access and inclusion</b>			
What	How	Who	When
<ul style="list-style-type: none"> <li>Reporting on well-being and health project funding</li> </ul>	<ul style="list-style-type: none"> <li>We will continue to discuss with lead universities how well-being and health funded projects are being informed by the current situation, and revised timelines for project reporting.</li> <li>We are delaying monitoring of activity related to safeguarding and period dignity and will review the timeline for reporting in discussion with providers</li> </ul>	HEFCW	<p>Ongoing</p> <p>Ongoing</p>

<b>Degree apprenticeships</b>			
What	How	Who	When
<ul style="list-style-type: none"> <li>Disruption to employment</li> </ul>	<ul style="list-style-type: none"> <li>We are encouraging HE providers to make use of distance-learning tools, where the nature of the qualification and the apprentice's employment circumstances permit.</li> </ul>	HEFCW and HE providers	Ongoing
<ul style="list-style-type: none"> <li>Reducing the burden from Degree Apprenticeship reporting</li> </ul>	<ul style="list-style-type: none"> <li>As institutions are working under challenging circumstances, and may find it difficult to provide all of the monitoring data at this time, we have informed providers that we are content to receive partially completed monitoring reports that provide basic data to enable payment for the current reference</li> </ul>	HEFCW and HE providers	April 2020

Degree apprenticeships			
What	How	Who	When
	<p>period (ie the second period of AY 2019/2020). We would, however, expect providers to include omitted data in the following reference period.</p> <ul style="list-style-type: none"> <li>While the submission deadline of 27 April 2020 remains for Proposals for Degree Apprenticeships for 2020/21, we only require <b>indicative</b> apprentice numbers on each pathway per employer where known. <b>Projected</b> apprentice numbers on each pathway can also be submitted where it has not been possible to engage with employers due to COVID-19. We <b>do not</b> require employer signatures. Delivery partner signatures are required, and these can be <b>electronic</b>.</li> </ul>		
<ul style="list-style-type: none"> <li>Extending the duration of qualifications on the Degree Apprenticeship programme</li> </ul>	<ul style="list-style-type: none"> <li>The impact of COVID-19 might result in the extension and/or suspension of qualifications during 2019/20. We have informed providers that this will be reviewed when the position is clearer.</li> </ul>	HEFCW and HE providers	October 2020
<ul style="list-style-type: none"> <li>Degree Apprenticeship Framework reviews</li> </ul>	<ul style="list-style-type: none"> <li>We have informed providers that Welsh Government plan to commission a technical expert from April 2020 to review HE provider updates to the Degree Apprenticeship Frameworks later this year. We are working with Welsh Government and HE providers to coordinate Framework updates, and keep the schedule under review.</li> </ul>	Welsh Government, HEFCW and HE providers	Ongoing

Research, innovation and engagement			
What	How	Who	When
<ul style="list-style-type: none"> <li>Consulting on the Research Excellence Framework (REF) 2021</li> </ul>	<ul style="list-style-type: none"> <li>We have been discussing the impact on the REF 2021 process with the other UK funders of REF.</li> <li>REF 2021 has been put on hold until further notice subject to further UK consultation on progress.</li> <li>Further information can be found on the <a href="#">REF website</a>.</li> </ul>	UK funders of REF	Ongoing
<ul style="list-style-type: none"> <li>Reporting on <i>Strengthening the Research Base</i> funding</li> </ul>	<ul style="list-style-type: none"> <li>End of funding reporting will be postponed from December 2020 to 31 July 2021. This will be subject to review, should challenges in progress against spending plans persist.</li> <li>Until then, any anticipated variations to spending plans should be notified in writing to HEFCW, as usual, with a brief explanation of how such variation continues to respond to the ambitions of the funding.</li> </ul>	HEFCW	July 2021
<ul style="list-style-type: none"> <li>Delaying Global Challenges Research Fund (GCRF) activities</li> </ul>	<ul style="list-style-type: none"> <li>Funding for 2020-21 has been agreed with UK Government and is due to be provided to institutions by October 2020. We will publish a circular with further information on funding allocations in due course.</li> </ul>	HEFCW, BEIS	July 2020

Research, innovation and engagement			
What	How	Who	When
	<ul style="list-style-type: none"> <li>Reporting schedules are subject to BEIS requirements, but are anticipated to follow the same cycle, with reports to be requested from eligible institutions in July.</li> </ul>		
<ul style="list-style-type: none"> <li>Reporting on <i>HE-FE Collaboration in Research and Innovation, and Civic Mission and Community Engagement funding 17/18</i></li> </ul>	<ul style="list-style-type: none"> <li>Final monitoring reports were submitted in March 2020. HEFCW will work with institutions to agree extensions required to complete projects and activities.</li> </ul>	HEFCW	May / June 2020

EU funded programmes			
What	How	Who	When
<ul style="list-style-type: none"> <li>Audit trails for participants on EU funded programmes</li> </ul>	<ul style="list-style-type: none"> <li>WEFO has provided <a href="#">guidance</a> on changes to audit requirements.</li> <li>Specific agreement has been received from WEFO in relation to audit requirements for the GO Wales: Achieve through Work Experience programme. Delivery teams have been informed.</li> </ul>	Welsh Government	April 2020

EU funded programmes			
What	How	Who	When
<ul style="list-style-type: none"> <li>Extending the delivery of the GO Wales programme for students currently in final year</li> </ul>	<ul style="list-style-type: none"> <li>We have agreement from WEFO that we can work with final year students up to the end of November 2020 after their graduation for this year only. This allows this cohort to undertake work experience via the project over the summer period.</li> </ul>	WEFO	April 2020

## Data returns and data audits

1. Student forecasts usually collected by the end of July (see HEFCW circular [W19/16HE](#)) will not be requested in the same amount of detail in 2020. Providers will only be asked for data needed for discussions between HEFCW and providers about financial viability.
2. The Transparent Approach to Costing (TRAC) and TRAC teaching (TRAC(T)) 2019/20 returns are likely to still be required but normal deadlines will not apply.
3. We are in discussion with HESA and other statutory customers about any decisions relating to HESA data returns.
4. We are intending to continue with the Information Reporting Interface Service (IRIS) for the 2019/20 HESA student record data returns and would like to hear from providers if there are any summary data that they would like us to include to aid return of data.
5. Changes to HEFCW returns such as the higher education students early statistics (HESES) survey and data for verification will be discussed with providers in due course. We will aim to ease burden where possible.
6. It should be noted that delays in receiving data that we normally use in HEFCW's funding allocations may mean delays to funding announcements in 2021. In addition, unavailability of data, changes in data quality or unusual patterns of activity that affect the data normally used, may mean that alternatives such as previous year's data are used in allocating funding. HEFCW will discuss any proposed changes with providers.
7. The consequences of any changes to the dates when data are available to HEFCW will be considered in the planning for the teaching and research funding reviews.
8. The annual HEFCW data workshop, which is usually held in July, is postponed. A new date will be arranged for some point in the future.



9. Data contacts in providers are encouraged to contact the HEFCW Statistics team at [hestats@hefcw.ac.uk](mailto:hestats@hefcw.ac.uk) with any questions. Answers to any questions that are relevant to all providers will be shared.
10. The next deadline for the return of the data systems and processes internal audit reports is 8 June 2021. The next set of external data audits will take place in spring 2021.