

## **Summarised responses to the consultation on HEFCW monitoring of institutional behaviour and performance regarding admissions for 2020/21**

Number of respondents: 8 (a list of respondents is provided at the end of the document)

### **General**

Key points:

- Respondents recognised the importance of having the opportunity to comment on the proposal.
- Proposals to assist the stability of the HE sector in Wales were welcomed given the positive impact on the economy and communities that universities make, as well as their capacity to help drive the UK's economic and social recovery post COVID-19.
- The proposal to monitor provider behaviour reinforced the importance, and principles, of fair admissions which would be in the interests of applicants.
- Consideration should be given to whether the number control would be implemented for a single year, or longer term.
- Clarification would be welcomed on how student number calculations were to be used in future forecasting activity.

### **Question 1: Is the data which we propose to use to calculate a numbers control appropriate? Please explain. (8 respondents)**

Agree (including with caveats): 6

Disagree: 2

Key points: (in favour)

- Recognition of the need to ensure control over recruitment levels.
- HEFCW's proposed methodology was appropriate.
- The importance of the sector operating in a consistent manner with universities in England and assist in stabilising sector admissions.

Key points (against)

- the proposed student number control might not maintain stability.
- Institutional ability to apply control measures would be limited to future applications and offers only as it would be difficult to adhere to a student number control without rescinding offers to existing applicants.

Other points

- It was essential to facilitate Welsh institutions' ability to maximise recruitment, in the context of the COVID-19 pandemic.
- If the intake numbers were only measured by completions, this data would only be known sometime after the event, and would be subject to in-year dropout rates.

- Clearing Plus had the potential to cause significant disruption to applicant behaviour, making it difficult to predict the offer level required to remain within the student number control.

In terms of the data used to calculate the control, respondents suggested that consideration should be given to:

- Providing transparency by publishing the targets for each university.
- Applying the cap at the subject/programme level.
- Setting the control at a lower level, through reference to last year's recruitment levels, and/or abolishing the proposed 5% margin.
- The level of tolerance for unusual dropout rates.
- Non-completion/ continuation rates, which could be impacted by the COVID-19 pandemic.
- How degree apprenticeship provision would be considered as part of the controls.

**Question 2: Is there any other information which we should monitor in order to maintain stability of the HE sector in Wales? Please explain.  
(8 respondents)**

Yes (including with caveats): 6

No: 2

Key points:

- Support for the proposal to review post-moratorium activity and any behaviour linked to tariff reduction
- A number of respondents made suggestions for other information which should be monitored by HEFCW (see below).

Suggestions for other information which HEFCW could monitor include:

- The mechanisms by which entrants from under-represented and non-traditional groups were made fully aware of the learning methods, culture and student support services of universities, before making their final decision.
- Reviewing the number of Unconditional Firm applicants at provider level, using UCAS data, with reference to the difference from the same point last year, noting that it would only be meaningful to consider such data following publication of A-level results.
- Reviewing adherence to the UCAS terms and conditions through spot checks.
- Incentive packages offered to applicants, which could be used to influence applicant choice.
- Reviewing pre-moratorium behaviour to understand the impact of this action on the stability of student numbers in the sector.
- Considering applicant behaviour in relation to offers, such as timing of response, changes to course choice, patterns for requests for deferred entry.

**Question 3: Are there any unintended consequences regarding the proposals in this consultation.  
(8 respondents)**

Yes (including with caveats): 8

No: 0

Key points:

- Franchise provision, and the potential for unintended impacts on the sector caused by institutional behaviour (and relationships between institutions).
- Failure to implement the proposal could result in unintended consequences.
- One respondent felt that the proposal to monitor tariff reduction data should be re-considered, as it could impact on the ability to recruit widening access students and on institutional autonomy.
- It was important to recognise that unconditional offer data could include students who have achieved the requirements of admission already, including through portfolio, or through recognised skills and experience gained through employment.
- Setting the control on student numbers based on numbers of completed registrations could result in institutions enrolling a large amount of students who they would perhaps expect to withdraw/drop out in their first year. If this happened this could be setting these students up to fail as well as having an impact on the stability of the sector.
- Students applying for places directly through Clearing could be impacted by the controls, which might disadvantage under-represented groups.

**Question 4: What positive or adverse effects will the policy have on:  
a. opportunities for persons to use the Welsh language; and  
b. treating the Welsh language no less favourably than the English language.**

**(8 respondents)**

Key points:

- Four respondents did not identify any positive or adverse effects on the Welsh language as a result of the proposals.
- Three respondents noted that the student number controls could affect an institution's ability to recruit Welsh Medium (WM) students or deliver WM provision
- One respondent reported that the use of tariff data could lead to WM students being at a disadvantage in relation to joining competitive courses due to not having had the opportunity to undertake additional tariff bearing qualifications.
- One respondent considered that competitive admissions practices (e.g. over-recruitment) in relation to WM programmes could have a negative impact on other institutions in the sector.

**Question 5: Could the proposals be changed to increase positive effects, or decrease adverse effects on:**

- a. opportunities for persons to use the Welsh language; and
- b. treating the Welsh language no less favourably than the English language.

**(8 respondents)**

Key points:

- Inclusion of a measure relating to WM within the student number control could result in a positive impact on the opportunities for persons to use the Welsh language.

Suggested action which could decrease adverse effects on the Welsh language include:

- Monitoring enrolment numbers and unconditional offers (made prior to level 3 qualifications being obtained) only instead of entry tariff.
- Monitoring the highest three grades achieved in level 3 qualifications.
- Monitoring of enrolment numbers for year 0 and year 1 entry only.

**Question 6: Do the proposals have any positive or negative impacts or unintended consequences in terms of equality and diversity and the Well-being of Future Generation (Wales) Act's seven wellbeing goals, Sustainable Development Principle and five ways of working?**

**(8 respondents)**

Key points:

- Institutions should not be penalised for making unconditional offers to students who have the necessary grades already.
- Institutions may not be able to maximise recruitment of widening access students, should their individual student control numbers be reached.
- There is a risk that the proposal could limit/remove opportunity of choice through restricting the autonomy of Universities to make decisions considering all factors including mitigating/extenuating circumstances.
- Less confident applicants could be likely to gravitate towards guaranteed places due to being risk adverse and a fear of rejection on the basis of places available, rather than making choices on the basis of where would be best place for them to study in terms of the course, support, location and graduate prospects.
- The proposals encompass the sustainable development principle in terms of looking towards the longer term and taking action to anticipate and prevent future issues where possible, through collaboration across the sector. These help to support the goals of the Future Generations Act of building a resilient and prosperous Wales, consisting of cohesive communities working together in a responsible manner to support the HE sector.

- A decision not to set a student number control cap as proposed could severely restrict the capability of institutions to meet their mission goals and objectives in relation to sustainability, due to differences between student number forecasts for 2020/21 and 2018/19 EYM statistics, and income used to support sustainability initiatives.

## **Respondents**

Aberystwyth University  
Bangor University  
Cardiff Metropolitan University  
Cardiff University  
Swansea University  
University of South Wales  
University of Wales Trinity Saint David  
Wrexham Glyndŵr University