



**WALES
CYMRU**

RESPONSE TO:
**Student support funding for students ordinarily resident in
Wales**

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Responses should be returned by **14 February 2017** to

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The University and College Union (UCU Wales) represents almost 7,000 academics, lecturers, trainers, instructors, researchers, managers, administrators, computer staff, librarians, and postgraduates in universities, colleges, adult education and training organisations across Wales.

UCU Wales is a politically autonomous but integral part of UCU, the largest post-school union in the world. It was formed on the 1st June 2006 by the amalgamation of two strong partners – the Association of University Teachers (AUT) and the National Association of Teachers in Further and Higher Education (NATFHE) – who shared a long history of defending and advancing educators’ employment and professional interests.

We welcome the opportunity to respond to the Welsh Government consultation on student support funding for students ordinarily resident in Wales.

UCU and UCU Wales fundamentally oppose tuition fees and believe that education is for the benefit of not just individuals but for society as a whole; therefore education should be publicly funded for the public good. We do however welcome the Welsh Governments acceptance of many of the Diamond Review recommendations, to continue to provide financial support for Welsh domiciled HE students, which will include part time and post graduate study, based on individual ability and potential, not on whether they can afford to pay.

We are pleased, to see the continuing recognition of the importance of ensuring opportunities for part time study, in both further and higher education and welcome the introduction of an equitable support package for part time students undertaking HE courses in either setting.

We also welcome the statement that Welsh Government do not believe that higher education should be organised on the basis of a market and share concerns over the reforms being proposed in England.

Question 1 – Are there any major implementation issues arising from the changes to the tuition fee and maintenance support packages which will impact on the timescale of the Welsh Government response?

Supporting comments

We welcome a staged approach to implementation and agree that the priority should be on establishing mechanisms to map out and evaluate the impact of the proposals. However we have concerns that trying to implement the new changes to tuition fee and maintenance support packages alongside the move to monthly payments, might compromise the time scale.

Question 2 – Are there likely to be any unintended consequences from implementing the changes to the tuition fee and maintenance support packages?

Yes	X	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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Supporting comments

UCU Wales welcomes the proposal to monitor and evaluate the implementation of the recommendations, so that any unintended consequence can be dealt with as they arise.

To ensure participation and choice are open to everyone, UCU wales would welcome inclusion of some form of alternative student finance offer, consistent with the principles of Islamic finance.

Question 3 – Do you have any suggestions for sharing risks and controlling the costs/numbers of students eligible for student support?

Supporting comments

Introducing a broader range of higher level vocational qualifications at levels 4 & 5, that can be delivered through a blend of FE and employer based attendance, which allows students with practical aptitude to develop their skills to a higher level degree equivalent would help to ease some of the demands made on HE institutions to provide degrees for all and reduce the demand for student funding in HE.

Hopefully, as a consequence of implementing Professor Hazelkorn’s recommendations student pathways will expand and reduce the demand for student support from Welsh Government to meet the maintenance and fee costs associated with HE. We welcome the recognition that the undergraduate route is not the most appropriate option for everyone and look forward to working with Welsh Government to provide equally valued alternatives.

Question 4 – Will implementing these proposals disadvantage any particular group?

Supporting comments

Possibly for some disabled/parents/carers if recommendations relating to these groups are not implemented at the same time as those for students who do not fall into those categories.

Question 5 – The Welsh Government would like to increase the number of courses provided at lower intensities. How can we encourage study on courses with an intensity of less than 25% without providing student support?

Supporting comments

We welcome the inclusion of part time provision in the new proposals, however we have concerns regarding access to HE for those who cannot study at or above the 25% intensity. We would like clarification of the definition of 25% intensity? Is there a set standard across the sector?

We would like to see government support for all HE students, regardless of mode. Not doing so is likely to disadvantage those most in need of courses of less than 25% intensity; particularly those with caring responsibilities and as we go into the future, low intensity courses for those in employment needing new skills and knowledge to allow them to change career paths. Support should be pro rata regardless of intensity.

UCU do not see how Welsh Government can encourage study on such courses without the offer of comparable support.

Question 6 – What impacts and unintended consequences will result from the move to monthly maintenance payments?

Supporting comments

We agree that changing to monthly payments would make finances easier to manage, however we share concerns that this may cause some initial difficulty with regard to large one-off initial payments such as securing accommodation, bench fees and initial course materials. Although this is not a new problem, the extra length of time needed to recoup original costs, may cause difficulties for some students. Perhaps the universal £1000 (or part of) could be upfront, with any remaining grant/loan paid monthly?

Question 7 – What impact will a move to a fully regulated system have on part time providers in Wales?

Supporting comments

We believe that part time HE should be regulated in the same way as full time HE. Part time students should be confident that the course of study they choose is subject to the same requirements as the full time equivalent. It is likely that this may create some additional administrative and/or financial burdens for part time providers, however if the role and functions of HEFCW are going to be absorbed into the proposed TEA, it would seem to be an opportune moment to begin the transition and alignment of all providers of HE.

Question 8 – Do you think any particular groups would be disadvantaged by this policy?

Supporting comments

If a fully regulated system is not in place until 2021 part time students are likely to be disadvantaged in the interim. However, we acknowledge that Welsh Government are using a staged approach to the implementation of recommendations and welcome the early proposal to map out and evaluate the impact of the changes; hopefully this will help to minimise any potential disadvantages in the interim period.

Question 9 – Do you think that the aim of achieving a fully regulated part time system by 2021 is a realistic timescale?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	X
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Supporting comments

Part time provision has been persistently neglected, it should not be so now. The proposed timescale indicates the continuation of the policy to place part time provision on a 'back burner', which is not acceptable. We would like to see a fully regulated part time system by 2021 at the latest, earlier if possible to ensure its implementation within this term of government.

Question 10 – Are there implementation issues which we should consider when taking forward our proposals for post graduate support?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	X
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Supporting comments

UCU welcomes the proposal for an equivalent support package for post graduate students and await further information and discussion, before it can comment on any implementation issues that might need consideration.

Question 11 – Are there likely to be any unintended consequences from implementing these proposals?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	X
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Supporting comments

See comment at Q10

Question 12 – Will implementing these proposals disadvantage any particular group?

Supporting comments

Possibly those on lower incomes. If post graduate fees are not regulated in some way do we run the risk of creating a 'glass ceiling above undergraduate higher education ' (Diamond 2016)

Question 13 – We believe that it would complex and costly to fully regulate the post graduate system – do you agree and if not how would you implement a fully regulated system in Wales?

Supporting comments

Without further detail of the cost and complexity associated with a fully regulated system it is not possible to provide much in the way of a constructive solution, however UCU endorses the Diamond recommendation that HEFCW/TEA should obtain historical cost data when setting maximum fee rates to help prevent costs from spiralling.

However would it be any more costly and complex if the regulatory system were built from that which exists for the undergraduate system?

Question 14 – Is there any other way of implementing our proposals for postgraduate students that would better promote equality of access?

Supporting comments

Consider extending the pro rata availability of support beyond 2 years. Students with caring/work responsibilities may need longer than two years to complete post graduate level study.

Question 15 – Are there implementation issues which will arise from providing support to students with an experience of being in a care setting?

Supporting comments

Whilst we support the proposals relating to students who have been in a care setting, clarification of the definition of "an experience" in a care setting is needed; for example, would a young person leaving care at 18 be in the same category as a LAC that had been adopted in early childhood?

Question 16 – How could we provide further support to students who are carers?

Supporting comments

Further support to students who are carers could be provided in the form of pro rata financial assistance, for courses of less than 25% intensity. In addition, support packages such as the Childcare Grant, Adults Dependents Grant and Parents' Learning Allowance could perhaps be revised to include eligibility for those studying at less than 25% intensity. With the wide ranging proposals for the entire education system in Wales, currently on the table, further development of flexible learning packages and access to HE in the local community could be one way of exploring further support for students who are carers.

Question 17 – Are there likely to be any unintended consequences from implementing these proposals?

Supporting comments

UCU Wales welcomes proposal for Welsh Government, through HEFCW, to work with NUS to help students with caring responsibilities, but finds it disappointing that no timescale is offered for discussion. This again is likely to impact on the adequate and timely provision of support for part time students.

Question 18 – Will implementing these proposals disadvantage any particular group?

Supporting comments

Students with caring responsibilities. Also see comment at Q17

Question 19 – How best can we implement and administer the proposed pilot scheme on extending the student support package beyond the UK?

Supporting comments

As a union, we fully support the internationalisation of education and recognise the enormous contribution EU academic staff and students make to the UK's success. We agree that in the interests of allowing students to reach their full potential, Welsh Government should explore the practicalities of extending the student support package beyond the UK and the EU. However until the consequences of Brexit are more fully understood, it is wise to remain cautious. A pilot at this point would provide a useful way forward with regard to developing a number of strategies for varying scenarios, so that we could potentially move to implementation more swiftly once the future relationship between Wales, the UK, the EU and beyond, are clearer.

Question 20 – Are there any particular issues that the pilot scheme should take into account?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	X
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Supporting comments

Question 21 – How would you control costs and demand for any future scheme that extends support beyond any pilot scheme?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	X
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Supporting comments

Question 22 – Are the subject areas listed above the ones that are of key importance in the context of equivalent or lower qualifications (ELQ)?

Supporting comments

UCU supports the removal of ELQ restrictions particularly in light of rapid changes in the economy, working practices and aging population, and appreciate that financial constraints necessitate some controls over the range of subjects offered.

However UCU questions the economic instrumentalist assumption that the only subject area of key importance are those related to STEM and Welsh Language. Professor Dai Smiths report into Arts in Education¹ highlighted the benefits of the Arts in developing a creative culture that will help Wales to thrive both economically and socially. Evidence that we should not disregard the value of Arts in building a vibrant and creative Wales. How can we develop our technology for example, without cultivating creativity beyond compulsory schooling?

Question 23 – Are there any other courses or subject areas that the Welsh Government should consider including? If so, why?

Yes	X	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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Supporting comments

Nursing and midwifery. Currently, holding a degree does not affect eligibility for bursaries, but should this change, we would want assurances that post graduates training as healthcare professional would be entitled to post graduate support.

Question 24 – Do you have any comments on any other aspect of the proposals included in this document?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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Supporting comments

¹ <http://gov.wales/topics/educationandskills/publications/wagreviews/arts-in-education-review/?lang=en>

Question 25 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

We agree that developing the next generation of researchers is essential and welcome the proposed postgraduate research scholarship; however, this on its own will not address the shortfall of researchers, as identified by the Chief Scientific Adviser for Wales. At present the prospects for any PGR scholar are grim. Many current researchers face the financial hardship and job insecurity of being employed on a series of fixed term contracts; not an attractive career prospect. Researchers find themselves in a situation that requires them to spend valuable time applying for new contracts and worrying about unemployment; time which could be better spent on research. In some cases, researchers are juggling more than one contract in order to make ends meet. This has to be addressed if we are serious about increasing the critical mass of researchers and the quality of research in Wales.

With regard to HEFCW's 'Basket of Goods', UCU Wales question how this will provide potential students with comparable information. Accommodation costs may differ depending on the location of the HE provider and may not be an indicator of quality at all. We also question reinforcing the notion that the most attractive 'Basket' will offer the better educational experience. UCU agree that refocussing financial assistance to maintenance, will help to eliminate everyday financial difficulties for students and we welcome this move. However, the requirement to provide the cost of a basket of goods on an annual basis, may have the unintended consequence of HE providers focusing their resources on marketing an 'attractive basket' rather than focussing on the quality of their HE provision.

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: