

HEFCW W13/12HE Part-time Higher Education Action Plan Consultation Response from Higher Education Wales

1. Introduction

1.1. Higher Education Wales (HEW) represents the interests of Higher Education Institutions (HEIs) in Wales and is a National Council of Universities UK. HEW's Governing Council consists of the Vice-Chancellors of all the HEIs in Wales and the Director of the Open University in Wales. The following is HEW's response to the above consultation launched on 25 April 2013, requesting contributions by 13 June 2013.

2. Executive Summary

2.1. The following key points are highlighted in our response:

- Part-time study is important for achieving not only a number of key strategic objectives in higher education policy, but for the future of Wales more generally. It is essential that investment in part-time higher education reflects this.
- In general terms we support an Action Plan and look forward to working with HEFCW to implement one. As a priority we would like the opportunity to revisit the plan with HEFCW, however, once the funding and support arrangements for part-time are clearer.
- Given the uncertainty over the future impact of university funding, student support and regulatory change, it is very important that the Action Plan remains flexible and establishes mechanisms to respond to emerging developments.
- The Action Plan would benefit from the development of a clearer vision and underlying strategy to enable this.
- Within the constraints of what is realistically achievable, we would also like to see a greater level of ambition and support for part-time study commensurate with its importance for higher education policy.

3. General comments

3.1. We welcome this opportunity to contribute to the development of HEFCW's Action Plan and look forward to working with HEFCW in its further development and implementation. Since the launch of the consultation, HEFCW's Corporate Strategy for 2013/14-2015/16 has been finalised. The need for a dedicated Action Plan reflects the fact that part-time study underpins many of its key strategic themes, and makes a special contribution to the goals of widening access, increasing

participation in higher education, the employability agenda, and forging a much closer relationship between business and the higher education sector.

3.2. Higher education is a key driver of economic growth, and a number of studies point to the link between the levels of attainment in higher education and economic prosperity. Part-time study and flexible learning modes more generally enable participation in higher education from a much wider and more diverse group of student than would be possible from full-time and traditional modes of study alone. In Wales, part-time study is arguable particularly important where the population has a lower proportion of adults with level 4 qualifications than the UK average, there is an ageing population profile, and removing social disparities through education is a key objective. Part-time study is frequently undertaken by students in employment, and is an important source of a sponsorship funding and potential point of interaction with business and employers. It facilitates student participation in higher education for a variety of different purposes and at widely varying levels of intensity of study from bite-size learning to the near equivalent of full-time study. Part-time study is also the dominant form of study for professional and postgraduate study.

3.3. In assessing the current Action Plan, we need to recognise that part-time study patterns are at a critical point and that in Wales, and we have a potential opportunity to shape the direction of part-time recruitment more positively. In England, HEFCE reported a 40% fall in students starting part-time undergraduate courses between 2010/11 and 2012/13. We have not seen comparable statistics for Wales at this stage. Since HEFCW's study of part-time provision in March 2012, the 2011/12 data for part-time enrolments to Welsh HEIs has shown an increase in undergraduate enrolments, but a decline in postgraduate enrolments. There are clear implications, however, not just for the sector but for Wales as whole, if the Action Plan for part-time study fails to respond to the level of risk posed to part-time study in the current environment.

4. The extent to which the Action Plan will contribute to Welsh Government part-time study-related expectations? Could more be done?

4.1. The key issues which are likely to affect the extent to which the Action Plan will be able to contribute Welsh Government part-time study-related expectations are, from our perspective, as follows:

- The high-levels of market uncertainty. In responding to this consultation, we recognise that there is considerable uncertainty surrounding the impact of the major funding and student support changes for patterns of recruitment in the part-time HE market. The major down-turn in the part-time student market in England raises the possibility of similarly serious position in Wales. This means

that there are high levels of risk in terms of the potential impact for students, providers and the attainment of the sector's strategic aims in respect of part-time study. In this context it is essential, in particular, that the Action Plan should be flexible and at this stage identify the processes for managing these risks and responding to emerging developments effectively.

- The alignment of the Action Plan with Welsh Government expectations. As indicated by HEFCW, the original HE part-time Action Plan was designed to address Welsh Government requirements which focussed largely on issues of part-time employer-focussed provision and progression from further education. The policy agenda has continued to evolve, however. The Remit Letter for 2013/14 extended the Welsh Government's expectations to a wider part-time study from bite-sized provision to postgraduate study. There is a particular focus on alternative models for study, and building progression routes with the FE sector. The new HEFCW Corporate Strategy, published shortly after this consultation was released, also adds CPD provision to its list of corporate strategy targets to reflect the growing importance attributed to this form of (typically) part-time provision. Most recently, the Welsh Government's new policy statement on higher education, published on 11 June 2013, identifies developing new ways of delivering part-time higher education as a future focus and outlines the need to respond to the challenges and opportunities presented by on-line digital learning. The scope of the Action Plan in our view needs to evolve and be broadened accordingly. As argued in HEPI's recent report on part-time learning¹, it would help to avoid artificial distinctions between part-time and full-time activity and encompass the full range of alternative modes of delivery within a single Action Plan. At the same time, we need be clear about where the priorities lie given the diversity of the part-time student market and potential objectives, both in policy and funding terms.
- The need to manage expectations relating to the Corporate Strategy targets. The HEFCW Corporate Strategy sets specific targets for part-time student recruitment (T4) and retention (T3b), and for continuing professional development learner days (T12). A key issue which HEW raised in contributing to the development of HEFCW's Corporate Strategy and related targets, was that expectations will need to be managed appropriately. The future direction of part-time recruitment could be largely determined by factors outside of the Welsh universities control. As HEFCW pointed out by HEFCW the sector currently appears unlikely to achieve the existing target for part-time. The inter-connection between the targets also needs to be properly appreciated – a

¹ Higher Education Policy Institute (HEPI) Report, "Flexible Learning: Wrapping Higher Education around the needs of part-time students", March 2013.

downward trend in part-time recruitment would also significantly impact on the targets for widening access (T1) and participation (T2), and Welsh-medium (T6).

- Potential changes to the relationship between the partners responsible for its delivery. The future regulatory arrangements for the sector are currently under consultation as part of the Welsh Government's HE (Wales) Bill proposals and may affect the exact relationship and role of the parties which the Action Plan currently identify as key to its delivery.
- Future student support arrangements for part-time students and levels of funding to support the Action Plan. Future funding and student support arrangements to support the Action Plan across the three year period 2013/4-2015/6 are not clear at this stage but will impact significantly on the extent to which Welsh Government objectives can be achieved, and the extent to which the Action Plan can contribute. We would like the opportunity to revisit the plan with HEFCW, once the funding and support arrangements for part-time are clearer.

5. The extent to which the identified actions will support the sector to improve part-time higher education opportunities and meet the Action Plan's measurable outcome? Are there any gaps in the Action Plan?

5.1. In general, we believe that the actions set out in the Plan will make an important contribution to improving part-time opportunities in Wales. More detailed comments on specific actions are provided in the next section. As it currently stands the Action Plan provides a useful initial platform for action collating the key existing proposals and initiatives and reflects the key new/additional requirements from the Welsh Government. However, as argued above, there is room for realigning the Action Plan with a broader set of expectations about part-time study. It is difficult to picture the overall direction and contribution to the strategic objectives from looking at the detailed actions. It would benefit from the development of a clearer vision and underlying strategy to assist in future development. Within the constraints of what is realistically achievable, we would also like to see a greater level of ambition and support for part-time study commensurate with its importance for higher education policy and the current levels of risk in this area.

5.2. In terms of achieving the measurable outcomes, as argued above, we need to be very careful about the expectations that are raised by the corporate strategy targets, in light of the external factors which may determine future part-time study patterns.

6. Whether there are additional innovative approaches we should consider and, if so, how might we implement and monitor them?

6.1. In responding to this question, we have considered the actions from a different framework/set of headings to help identify potential issues. We highlight specific recommendations for actions to include in the Action Plan in bold below.

Recruitment – demand-side factors

- **Student support**

6.2. Changes to the effective cost of study for part-time students including student support arrangements, as demonstrated in England, could pose the single largest threat to part-time study in Wales. As a sector we need to identify effective arrangements that will be sustainable in the longer-term. In March 2013, the Minister for Education and Skills issued a statement which confirmed that his intention is not to introduce a full new student support regime for part-time students for 2014/15. The Welsh Government announced arrangements for student support for 2014/15 shortly after the launch of this consultation.² At this stage a number of its details are yet to be clarified, and this still leaves considerable uncertainty about future arrangements. There is currently no recognition of the critical role that we expect HEFCW to have in developing future arrangements, and we would like to see this more explicitly set out as an action.

6.3. There is a range of issues to consider very carefully in developing future student support arrangements with the Welsh Government:

- The part-time student market appears to be particularly sensitive to changes in support and the costs of study. The availability of loans in England has not been sufficient to avoid a significant reduction in recruitment – though this may primarily be an awareness and take-up issue.
- We remain concerned that any replacement of fee waivers with student fee loans will create a barrier to education, particularly for those students from economically disadvantaged backgrounds.
- It is essential that effective student support arrangements extend to student with prior qualifications as well. Around 38% of part-time students in the UK already hold first degrees or postgraduate qualifications (it is around 14% for part-time undergraduate degree students)³. Arguably up-skilling and re-skilling within the economy is also a priority for the Leitch and *Skills that Work for Wales* agenda.

² Welsh Government, Student Finance Wales Information Notice (03/2013), “Part-time Student Support: Fees (Wales) for Academic Year 2014/15”, 03 June 2013.

³ Callender C., Jamieson A., Mason G., UUK Research Report : The supply of part-time higher education in the UK, (2010).p.18, Table 5.

- It is essential that students studying with an intensity of between 75%-99% are fully accounted for and included within the new support arrangements, under whichever heading they are classified. The percentage of part-time students in the UK who study at an intensity of 75% or greater is about 6%.⁴
- We strongly support the intention to provide parity for part-time and full-time students in terms of support arrangements. The particular circumstances and needs of part-time students can differ considerably and should be taken into account in assessing the impact of the proposals. For higher levels of study intensity, in particular, however the distinction between full-time and part-time is largely artificial – particularly as there is now a growing proportion of students who are employed at the same time as undertaking full-time study.
- We are also concerned about the apparent lack of student support for students who access higher education through study at an intensity below 25% - particularly for those for whom this forms their pathway into higher education for the first time. Future enrolments from this group of part-time students would also have a significant impact on the attainment of corporate strategy targets as currently expressed.

Action: work with the sector and Welsh Government to identify and implement sustainable and effective funding arrangements for student support

- **Transparency of information**

6.4. There will be a need, in particular, to communicate the student support arrangements effectively to part-time students for them to have proper effect. Initial analysis of the impact of support based on loans in England (e.g. by the Higher Education Policy Institute) points to lack of awareness/understanding of the loans being potentially a very significant issue. The Rees Review⁵ and Graham Review⁶ have previously identified this as a major factor in the success of financial support policies in Wales. We also need to bear in mind that the potential complexity of part-time study can also lead to more complex support packages which are more difficult to communicate.

6.5. Particularly if we move to greater dependency on student loan arrangements, then Action 12 (clarifying and promoting the part-time fees and support regime in Wales) will be very important and substantial provision needs to be made for activity in this

⁴ UUK Research Report (2010), op.cit., p.23, Table 13.

⁵ Rees, T. (chair), Fair and Flexible funding: A Welsh model to promote equality and access in Higher Education - Final Report of an Independent Study into the Devolution of the Student Support System and Tuition Fee Regime in Wales, May 2005.

⁶ Graham, H.(chair), Independent Review of Part-time Higher Education Study in Wales – Final Report, (June 2006), e.g. para.6.10 (Recommendation 10).

area. The action/outcome is not specific at this stage and it is unclear whether there any step changes in activity or new initiatives are intended in this area. In England, there has been a large awareness campaign in response to the downturn in part-time enrolments. In addition to existing arrangements for making information available and promoting awareness, we would welcome exploring with HEFCW what additional actions may be effective.

- 6.6. Informational requirements extend well beyond student support provisions. Potential students need to factor in the range of costs and benefits in determining to pursue part-time study – and initiatives such as the key information sets have been designed to address this. Action 10 recognises the importance of making good information available to students in general, but focusses on finalising an agreement between HEFCW and Careers Wales. We would like to see greater importance attached to this area more generally, and see an action included in the plan which specifically addresses information requirements at the recruitment stage.

Action: HEFCW to work with the sector and Welsh Government to ensure that information for potential part-time students relating to the costs, benefits and support for part-time study are communicated clearly.

- **Improved applications processes**

- 6.7. One of the key actions for HEFCW will be Action 7, contributing to developments in relation to the UCAS national part-time applications portal. We would like to work with HEFCW to examine the feasibility of the proposals and to ensure that any changes to the current systems will deliver real benefits to part-time applicants in terms of access to improved information and advice, improved ease of application and overall experience.

- **Promotion, Image and reputation management**

- 6.8. The promotion of part-time study in Wales at a sector level should be an important component of the Action Plan. As for recruitment to full-time (particularly international) students the perceptions of universities and study in Wales is very important. We need to ensure that the particular requirements of part-time students are taken into account in developing a positive brand and image in Wales and it is likely that this will be most effectively achieved through a joint development and ownership between the sector, HEFCW and the Welsh Government. Subject to developments in relation to a UK wide part-time applications portal, there are potentially further mechanisms to be explored for informing and sign-posting potential part-time applicants on a regional or pan-Wales basis.

Action: work with the sector and Welsh Government to develop a positive brand and image, which will also promote part-time and alternative forms of study.

Action: explore additional mechanisms for informing and sign-posting potential applicants on a regional or pan-Wales basis.

- **Employer sponsorship**

6.9. One of the main factors determining demand for part-time provision is support from employers. Training budgets and minimising staff absence are both key issues, as well as perceptions about the value of learning opportunities. Increasing employer support runs in line with the wider policy expediency of stimulating greater employer engagement (e.g. as signalled by the Leitch Report). In line with the outline proposals of the Welsh Government's Innovation Strategy for Wales, we should be seeking to develop business-university clusters in a number of key strategic areas and as part of that we should consider how engagement through part-time study can be promoted. There may be a range of potential ideas to explore for part-time which link in with potential developments in the Innovation Wales strategy and the HE Skills and Employability for Wales Action Plan - including, for instance, considering how anchor companies could play a role in directing pump-priming funds for initiatives and common training programmes.

Action: explore mechanisms for encouraging greater employer sponsorship with the sector and Welsh Government linking with Innovation Wales and science strategy developments.

Recruitment – supply-side factors

6.10. Both the OldBell3 report in Wales and the UUK study in England point to the importance of addressing supply-side issues for maximising part-time recruitment,⁷ and point to evidence of instances where the supply of part-time provision has been the determining factor in accounting for changes in part-time enrolment patterns in Wales.

- **Funding for providers**

6.11. Determining future levels of funding for part-time providers is probably the single most important issue for HEFCW to address. The impact of funding policy on providers has been underestimated in the past in determining the part-time recruitment trends. The future model for supporting providers and incentivising

⁷ Gareth Williams, Old Bell3 Ltd, Employer engagement with part-time higher education, (2010); UUK (2010) op cit.

opportunities is likely to make a substantial difference to future part-time study patterns. Without greater levels of certainty about the funding that is attached to the Part-time HE Action Plan, it is difficult to plan in detail or be confident about what can be delivered at this stage.

6.12. Overall levels of funding for part-time study currently remain a concern. The direct grant to support part-time provision was significantly reduced for 2012/13. In light of the overall funding constraints, we welcome the decision to continue the teaching grant for 2013/14 and maintain its current level of investment at 'broadly current levels in real terms' as a minimum in line with the Welsh Government's direction in the HEFCW Remit Letter (as reflected in Action 1). Greater clarity is needed, however, about the levels of funding commitment to part-time study beyond 2013/14 and for the longer term in particular.

6.13. In reviewing future arrangements, we identify the following key issues to address:

- A steep decline in the strategy budgets including the forthcoming removal of Widening Access and Innovation & Engagement strategy funding, will indirectly impact on funding for part-time study and make it harder for HEIs to maintain or increase part-time numbers.
- There remain significant issues relating to the parity of funding for undergraduate part-time and full-time study: full-time fee levels have significantly increased and can off-set the reduction in full-time grant, but there is a question whether part-time fee levels, which are already unrestricted, can increase beyond current market levels (and we note the Welsh Government's expectation is that future fee levels for undergraduate part-time students will not increase).
- Support for part-time intensive providers in Wales needs to be reviewed, particularly in the light of the Welsh Government's new Policy Statement on HE which highlights greater specialisation as a potential future focus for the sector. Part-time intensive universities benefit comparatively less from increased undergraduate full-time fee levels and are less able to offset reductions in grant funding.
- The barriers to providers arising from differences in the cost of study between different modes of provision need to be recognised. Studies confirm that there is comparatively greater administrative complexity and costs per student for part-time study. Within institutions part-time study can be catered for very differently: part-time study can be fully integrated with full-time study, partly integrated, or taught entirely separately from full-time students –with particular departments or institutions specialising in part-time activity. A step change in recruitment patterns, may also require significant investment/changes in infrastructure and associated costs.

- Future arrangements will need to address how to provide adequate support for high-costs subjects and how to avoid adverse impact on subject areas of strategic importance.
- HEFCW is specifically mandated in the HEFCW Remit Letter to address for bite-sized provision and postgraduate taught provision. Future levels of funding and the relative funding priority for these areas of part-time activity are particularly unclear at the moment, however.

6.14. The implementation of new part-time student support and funding proposals were delayed in Wales, on account of the need to give better consideration to the policy implications in light of emerging developments. As a sector we need to ensure that we use the coming months effectively to draw on our collective knowledge and expertise to identify the most viable options for Wales in the future. Action 11 simply refers to HEFCW implementing and publishing their funding intentions for part-time study. We would welcome a more explicit action on HEFCW to review and explore future arrangements with the sector – and the emphasis needs to be on an early exploration of options with the sector at a formative stage of policy development.

Action: review and explore future funding options for providers from 2014/15 with the sector.

6.15. Supporting the sector to take advantage of potential opportunities to access to alternative funds to support part-time provision should also feature as an action. In particular there are potentially significant amounts of European Structural Funds to access in the next phase for 2014-20 which will need to be prioritised over coming months.

Action: support the sector to take advantage of potential opportunities to access to alternative funds to support part-time provision, including the next round of European Structural Funds.

- **Access to facilities and support**

6.16. Beside cost, accessibility is the next largest factor in determining recruitment. The timetabling and scheduling of provision is often one of the most significant barriers for potential students needing to fit study around employment, family, or other commitments. Within institutions part-time study can be catered for very differently - full-integrated with full-time study, partly integrated, or delivered entirely separately – and these present different degrees of challenge in timetabling effectively for the part-time market. Access to facilities outside of standard hours or terms is also a significant issue. At undergraduate level it is noted that in Wales the sharpest divergence in levels of satisfaction between full-time and part-time students in the 2012 NSS survey relates to access to specialist equipment and facilities when

needed (percentage of students satisfied: 77% of full-time, 63% part-time) and contact with staff when needed (85% full-time, 80% part-time). A change in practice (including employment terms) and the investment in infrastructure required to enable a step change in delivery can be prohibitive.

- 6.17. Given the importance of these issues, however, this is a conspicuous area for further development in the Action Plan. There is also likely to be benefit from researching this area more thoroughly: do we have an overview in the sector of the level of provision in evenings and weekends (there is no equivalent of Birkbeck in Wales in this respect)? How far does the current part-time offering provide realistic opportunities for part-time students needing to minimise disruption to their employers/other activities? Is there further scope for collaboration between institutions that would allow costs of non-standard delivery to be mitigated? It may be that we can identify particular segments of the part-time market to focus on initially.

Action: investigate further actions at sector level to remove barriers to study relating to access to provision and facilities.

- **Franchise provision**

- 6.18. Franchise activity accounts for a large proportion of part-time enrolments, and in the past, as HEFCW's study in 2012 highlighted, reductions in franchise numbers have had a significant impact on overall part-time recruitment in Wales. Previous reviews of collaborative provision between HE and FE have led to the current policy of encouraging further expansion of HE in FE through the franchise model, but there remains a small amount of directly funded activity, and the current FE and HE (Governance and Information) (Wales) Bill proposes to remove the Welsh Government powers to regulate HE enrolments in FE. Clearly in this context, the priority will be to establish not only what in future will be the best approach to working with FE to maximise part-time and flexible delivery regionally (Action 19), but ensuring that the new regulatory framework provides HEFCW with sufficient control over its budget/ financial exposure to implement any policy recommendations arising from review of future arrangements.

Action: to review the impact of future regulatory changes in relation to franchise arrangements and other forms of collaborative activity and identify appropriate means to control its budget and implement any policy recommendations

- 6.19. More generally, we will need to consider arrangements for alternative providers as part of the regulatory changes for the sector – including the current consultation on HE (Wales) Bill. Private providers are not currently subject to the same level of regulation or social justice requirements as universities and do not bear the

associated costs of these activities. Part-time provision may be particularly affected by changes in the regulatory framework in Wales.

- **Building progression routes and collaborative provision**

6.20. There are significant long-term benefits to be gained from building progression routes from further education to HE (Action 20) which must form a priority for this Action Plan's contribution to the widening access strategic theme including from Communities First areas. We recognise the need to identify opportunities for partnerships and collaborations to maximise part-time and flexible provision locally (Actions 19 & 20). We welcome the intention to use regional planning arrangements to encourage this.

6.21. Support for collaborative higher level apprenticeships (Action 15) and further development of the HEFCW One Wales Foundation Degree Programme (Action 14) are likely to make positive contributions to increasing part-time access to HE – though we would welcome further information on the latter.

6.22. We also strongly support the need to review and encourage progression to part-time postgraduate studies identified in Action 16, including access to the professions by widening access students.

- **Flexible modes of provision and on-line education**

6.23. Significant advances have been made in 'open education' – specifically the development of Open Educational Resources (OER), Open Education Practice (OEP) and Massive Open Online Courses (MOOCs). These developments are rapidly changing the landscape of traditional delivery of higher education and Wales will need to embrace emerging technologies and identify its own niche in taking advantage of the opportunities that this could potentially offer. As highlighted above, not only does this potentially enable higher education to engage with new participants and in new ways, it may also provide potential solutions to many of the problems inherent in offering traditional part-time provision (see access to support and facilities above). In its new Policy Statement on Higher Education, the Welsh Government reminded us that universities will not be insulated from these challenges and highlighted the need for the sector, HEFCW, and the Welsh Government to explore new models together as a key priority.

6.24. We welcome the reference that the Action Plan makes to the Welsh Government's Online Digital Learning Working Group (Action 2), the further action to support the development of on-line resources (Action 18), and support for the Cadarn learning portal (Action 8). We would also like the Action Plan to reference the important work being conducted in parallel by the sector led group focusing on

OER and OEP, working to create a portal to showcase the best OERs Wales has to offer, and to embed OEP in institutions across Wales. As possible national technological solutions are being explored and developed, Universities should also be encouraged to enhance and increase the range of part-time provision that is available online and through a variety of flexible formats.

Action: support developments being led within the sector in OER and OEP and encourage institutions to increase the range of part-time provision available on-line and through a variety of flexible formats.

Provision

- **Student experience and retention**

6.25. The issues for part-time students in terms of student experience are typically different in a number of respects from full-time students (see comments above in relation to access to facilities and staff). Whilst it is encouraging to see the use of student evidence from NSS to analyse trends in part-time student experience (Action 23) it would also be useful to encourage those HEIs who take part in the Postgraduate Taught Experience Survey (PTES) to look for trends in the outcomes of their own part-time learners.

6.26. It is important that students studying part time have the same access to support and services offered by the institution as for those studying full time, for example, financial advice, mental health advice, effective representation and so on.

6.27. We would like to see more best practice shared and celebrated across the sector – e.g. on matters such as Student Charters. We would like to see HEFCW leading in this by, for instance, producing a best practice guide for institutions and student unions. In terms of innovation, a range of approaches are being tried and tested at institutions across Wales, and some have been showcased by the Higher Education Academy as part of the Future Directions quality enhancement programme of work. The Learning in Employment publication includes a range of case studies, for example:

- the Learning Through Employment: framework and resources toolkit to facilitate higher levels of adoption of work-based learning through articulating different progression pathways from higher education entry level through to postgraduate study – three different toolkits are aimed at employers, learners and lecturers;
- the LATERAL (Liberating Aptitudes by Technology-Enhanced Recognition and Accreditation of Learning) initiative concerns the accreditation of prior experiential learning (APEL), and specifically with the development of an innovative, quality assured approach to the achievement of advanced standing

via APEL (page 47). The aim is to develop, pilot and implement a bilingual technology enhanced learning environment to support the work based learner in achieving APEL through reflection.

- **skills & employability – meeting market needs**

6.28. We view the Skills and Employability framework as a key vehicle for taking forward initiatives in this area (see Action 6, developing the Skills and Employability Action Plan for Wales) including the Welsh Government’s Remit Letter mandate to address employer-led courses. We would expect the particular opportunities for part-time students and related employer engagement to be featured in the Action Plan.

6.29. We also note initiatives such as GO Wales, and UHOVI – areas where Wales has demonstrated a pioneering approach. There are also further opportunities to encourage credit transfer to enhance student mobility, in line with the objectives of the Bologna process, and to build on Wales’ lead in terms of the use of HEAR information. A major issue over the next few years in terms of learning and teaching will be the UK Professional Standards Framework – we would like to explore further with HEFCW what can be done to encourage this to be used in terms of CPD (benchmark professional development).

6.30. Action 6 refers to progressing HEW and the CBI progressing the Skills and Employability Agreement. This should be all four partners – HEW, CBI, HEFCW and NUSW.

Monitoring and review

6.31. Given the level of current uncertainty and risk, it is essential that the plan remains flexible and responsive to change. The Action Plan signals on-going review through HEFCW committees in the light of Welsh Government policy developments (Action 30). It also accordingly, sets out a number of areas for monitoring of different actions e.g. monitoring the progress of the Corporate Strategy part-time measure (Actions 4 & 5), monitoring UK & Welsh trends in part-time provision (Action 27), monitoring progress on the Action Plan’s actions (Action 29), and assessing the effect of the part-time premium (Action 13). Given the level of uncertainty, however, we would anticipate the need for major review in the near future that would allow the sector and HEFCW to plan in more detail and would like HEFCW to include an explicit action to revise the Action Plan with sector once the funding and support arrangements for part-time are clearer. We would also like to see enhanced processes in place for engagement with the sector in its continuing development.

6.32. We will await consultation on any further plans to extend the use of Corporate Strategy measures e.g. as part of fee planning/regulatory arrangements. As highlighted in the recent consultation on fee planning arrangements, a change in use needs to be carefully considered with the sector, and the current indicators will need to be revisited for fitness-for-purpose in light of any changes. If there are any changes to future reporting requirements, however, we will need to identify these as far as possible in advance to ensure that institutions are able to process them accordingly.

6.33. Action 28 is welcomed and needs to be given sufficient priority. We need to be able to understand the part-time market well in order to respond to emerging developments. We very much welcomed the studies that HEFCW published surrounding the employer-focussed part-time provision. However, in general, as pointed out by HEPI, there is still a comparative lack of studies and information to help us understand part-time provision. We would welcome further consideration about how to consult effectively on future development of the Action Plan with a wider range of key stakeholders including students (e.g. under Action 3). The focus needs to shift from consultation with the sector on proposals in the late stage of development to encourage sharing of ideas at an early stage to identify potential options and assess their impact.

7. Whether there are any aspects of the Action Plan, or its implementation that might impact negatively, or have unintended consequences for, individuals with protected characteristics or individuals under-represented in higher education?

7.1. Part-time study is characterised by a diverse student population and different policy measures could have very different impacts on different segments of the part-time market. Policy relating to part-time provision may have a particular impact on widening access (including Communities First students) and Welsh Medium provision because of the large number of part-time students in these groups. There may also be specific subject impacts which may in turn have implications for particular groups (e.g. gender). Actions to promote inclusion need to span the full student life-cycle from awareness raising to progression through higher education. We support the increase in availability and accessibility of Welsh medium online and other flexible learning (Action 25), and note the continued support for the Universities of the Heads of the Valleys Institute (Action 21). As highlighted by Action 9, we recognise that particular attention may need to be given to bilingual considerations in implementing the Actions in the Plan.

8. Are there any equality and diversity, sustainability, or Welsh medium issues that should be considered further in developing the draft Action Plan?

8.1. See, response to 7.

9. Further general comments

9.1. In relation to Action 24, we assume that this is meant to reflect the fact that different institutions have different strengths and missions so may legitimately make different contributions to the part-time policy agenda, rather than suggest that pursuit of the policy agenda would be applied to individual institutions selectively.

9.2. In relation to Action 1, (“HEIs to exercise restraint in setting of part-time tuition fees”) – we believe it would be more appropriate to rephrase/replace Action 1 (iii) with an action to monitor the fee levels for part-time study in Wales and its impact for students and providers.

9.3. Finally, there are currently relatively few actions in the Action Plan relating to bite-sized provision and postgraduate taught provision. It is not clear at the moment how the Action Plan will address these areas as mandated in the HEFCW Remit Letter or the level of funding/priority that will be attributed to these in practice.

HIGHER EDUCATION WALES

June 2012