

Support for foundation years A consultation response by Universities Wales

1. About Universities Wales

- 1.1. Universities Wales represents the interests of universities in Wales and is a National Council of Universities UK. Universities Wales' Governing Council consists of the Vice-Chancellors of all the universities in Wales and the Director of the Open University in Wales.

2. Introduction

- 2.1. The following paragraphs contain the response of Universities Wales to the Welsh Government's consultation on proposed changes to the financial support arrangements for higher education students undertaking a foundation year at universities, published on 3 March 2016.¹

3. General comments

- 3.1. We appreciate this opportunity to inform the policy making of the new Government in relation to ongoing support for foundation year programmes or equivalent in universities in Wales. We recognise that this consultation was set in train by the previous administration to inform the work of the future government in Wales. In our view many of the concerns expressed in the consultation documents, when examined in detail, lack foundation and demonstrate that a fresh assessment of the issues is needed, and we look forward to working with the new administration to ensure that students have the best possible opportunities to pursue higher level study in Wales.
- 3.2. As can be seen from our submission below, foundation year programmes and their equivalent are of considerable benefit to students, and for many good reasons are the first choice of entry into higher education for an important group of students.
- 3.3. In particular, foundation programmes are vital for science, engineering and technology. They also make a significant contribution to widening access, increasing the number of HE students from disadvantaged groups and improving the likelihood of successful progression and outcomes.
- 3.4. The Welsh Government also appears to be mistaken in its assumptions about the cost of such provision, and the availability of cheaper alternatives. In our view, it would be very difficult to provide sustainable alternatives without even greater investment. Given the scale of provision, the potential savings to the Welsh government's budget are likely to be

¹ <http://gov.wales/consultations/education/support-for-foundation-years/?lang=en>

marginal at best, and to come at a very heavy cost in terms of the Welsh Government's science agenda in particular. The removal or reduction of support for foundation year provision at universities is more likely to mean the loss of students who would not otherwise have pursued higher education.

3.5. In the following paragraphs, we respond directly to the questions posed in the consultation, setting out our views in greater detail.

4. Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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4.1. We strongly disagree. We think that the concerns of the previous Welsh Government administration has not been informed by robust evidence, and a better knowledge and understanding of the nature and contribution of this type of provision is likely to lead to a very different assessment of its value.

5. Scale, growth and competition

The scale of current foundation year provision in Wales

5.1. The Welsh Government's presentation of its data is potentially confusing, and appears to exaggerate the extent of the provision compared to overall student numbers. In paragraph 6 (and Table 1) the Welsh Government identifies that there were 1,179 full-time Welsh domiciled students studying in Wales on programmes with a foundation year, based on SLC data. However, this analysis includes students from all years of such programmes not just those on the foundation year. The actual number of foundation year students that the Welsh Government provided support for in 2013/14 was considerably less. In paragraph 7, the Welsh Government's Figure 1 indicates that the number of full-time Welsh-domiciled students on a foundation year in Wales in 2013/14 was around 615.

5.2. In terms of scale, this is less than 1% of the total number of Welsh domiciled students studying across the UK which totalled 100,085 according to the Welsh Government's own statistics in 2013/14, when all modes and levels are included (as they are in the foundation year figures).² In 2013/14 there were 129,130 students studying at universities in Wales.³

² Stats Wales, HE enrolments of Welsh domiciled students at UK HEIs by level, mode, gender and disability (see [here](#)).

³ Stats Wales, Higher education enrolments at Welsh HEIs by domicile, level and mode (see [here](#)).

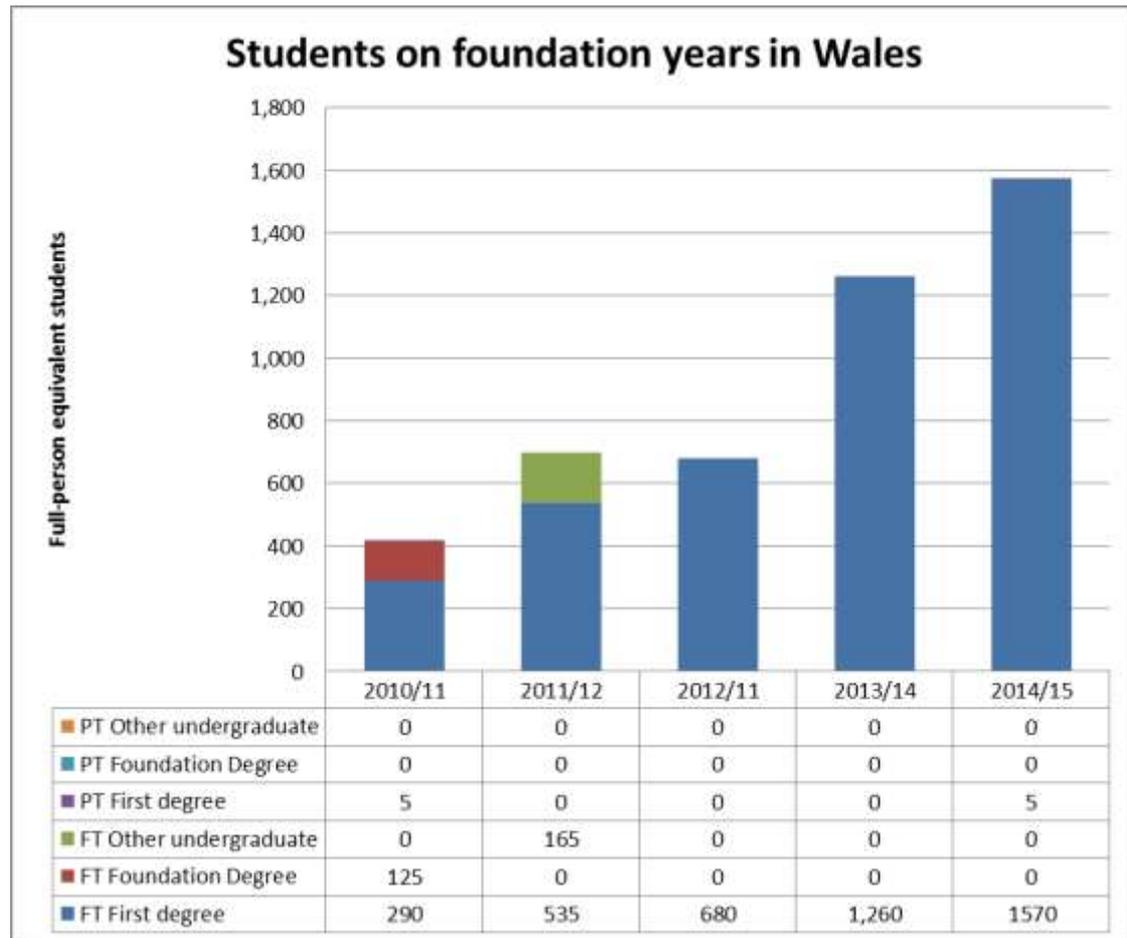
5.3. The presentation of the data from the Higher Education Statistics Agency (HESA) in the consultation document is incomplete and potentially misleading in a number of respects:

- Its discussions in paragraphs 6 and 7 of the consultation document used mixed sources, different years, and different data specifications.
- It ignores the substantial number of students from the rest of the UK and overseas that could be potentially affected by the proposals.
- The Welsh Government has only presented HESA data where students have been specifically marked as on a foundation year or year zero of a programme (which from here we refer to as a 'HESA foundation year analysis'). However, there are some programmes, which appear to fall within the scope of the proposed changes, which for a variety of reasons, were not recorded in the HESA data in this way. This includes for instance, degrees recorded with an extended or enhanced pattern of study, and some 4-year programmes, where students recorded on year 1 are effectively doing their 'preliminary' or 'foundation' year.
- Perhaps because the Welsh Government has relied on the foundation year analysis, it appears to have overlooked part-time provision. Most, but not all, is full-time undergraduate level, according to our research. The Open University in particular provides a distinct distance learning mode of delivery in its part-time level 0 offer, with around 300 students studying on a modular basis (rather than for a full academic year equivalent) in 2015/16.

5.4. From our research it is clear that almost all institutions in Wales offer foundation year provision or equivalent. The Welsh Government will need to conduct more careful research and analysis, however, if it is to gauge the scope and scale of the impact of these proposals accurately.

5.5. According to HESA foundation year data there were around 1,570 students on foundation years in Wales in 2014/15 (see Chart 1) of which 795 were from Wales (see Chart 4).

Chart 1

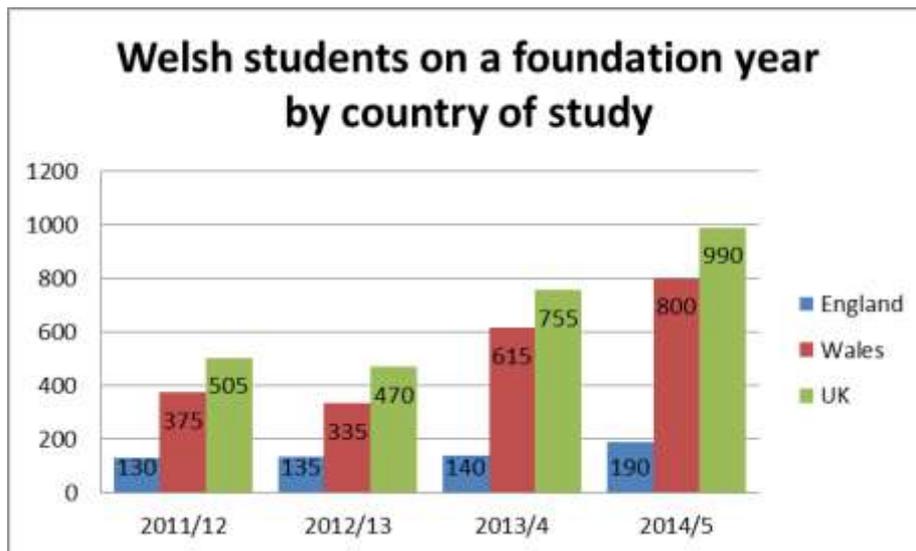


5.6. In addition to the student numbers identified by the HESA foundation year analysis, we currently understand, for instance, that there are around 95 further enrolments on year 1 of full-time 4-year degree programme, and 60 enrolments on undergraduate full-time degrees with an extended/enhanced pattern of study that are likely to be equivalent for purposes of changes to the student support arrangements. This provision is entirely in science, engineering and technology subjects. There are also around 300 students on distance learning part-time provision (see 5.3 above).

Growth

5.7. The Welsh Government indicates that foundation year provision at universities is growing. This appears to be based on the limited evidence provided in paragraph 7 (figure 1), which only looks at years data up to 2013/14 (and not all foundation provision as discussed above). The HESA foundation year data is now available for 2014/15 as well (see Chart 2), and does appear to confirm recent growth in the number of students on foundation years in Wales.

Chart 2

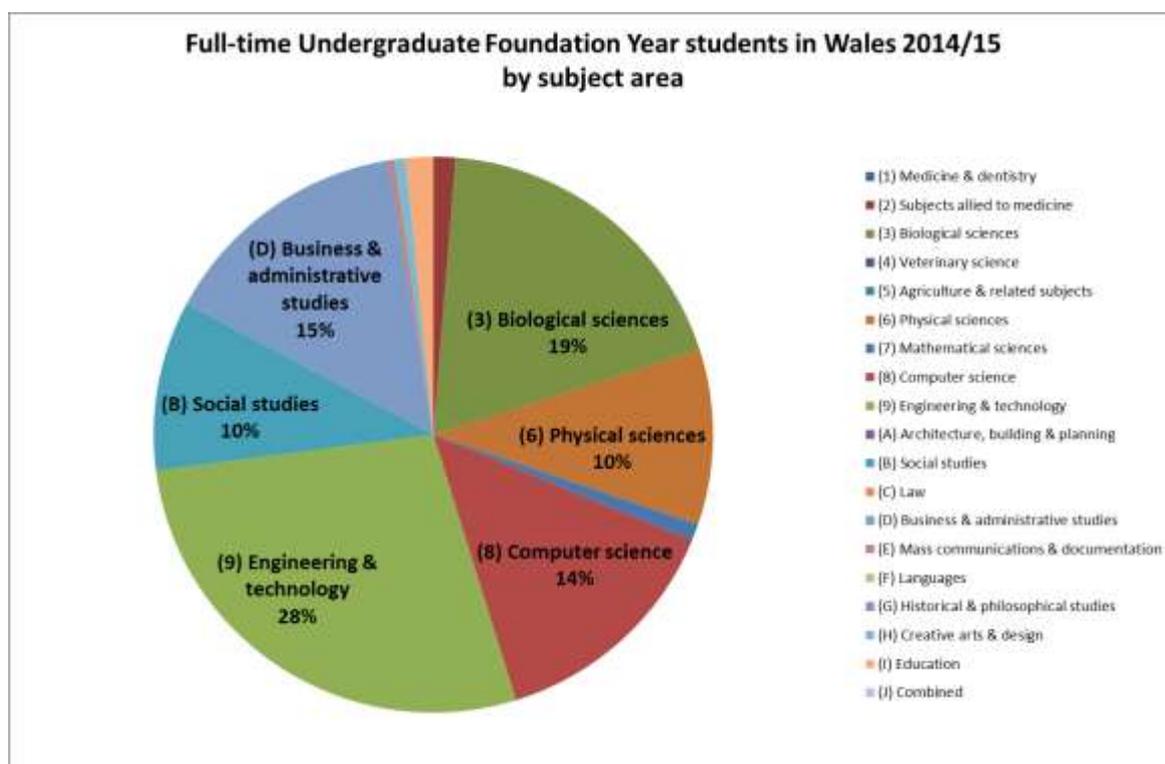


- 5.8. This data makes it clear that the growth is not just at Welsh universities, however. In fact, the largest percentage increase in 2014/15 was of Welsh students going to England (36%). In other words, there appears to be a growing student demand for foundation provision at universities across the UK.
- 5.9. The HESA figures also need to be read with caution. We understand from universities that a significant part of the apparent growth in courses and some of the growth in numbers may be due to changes in coding practice, partly to accommodate new SLC requirements, and apparent rather than real. In addition, the programmes not covered by foundation year analysis appear to have been far more static in terms of numbers.
- 5.10. From our discussions it appears that some universities are expecting some further growth in 2015/16. However, we would expect this to primarily come from increasing numbers on existing programmes rather than new programmes.

Subject and student profile

- 5.11. Currently, foundation year programmes in Welsh universities are overwhelmingly provided in science, engineering and technology (see Chart 3). This includes in particular Engineering and Technology (28%), Biological Sciences (19%), Computer Science (14%) and Physical Sciences (10%). Only a quarter of provision is in other subjects.

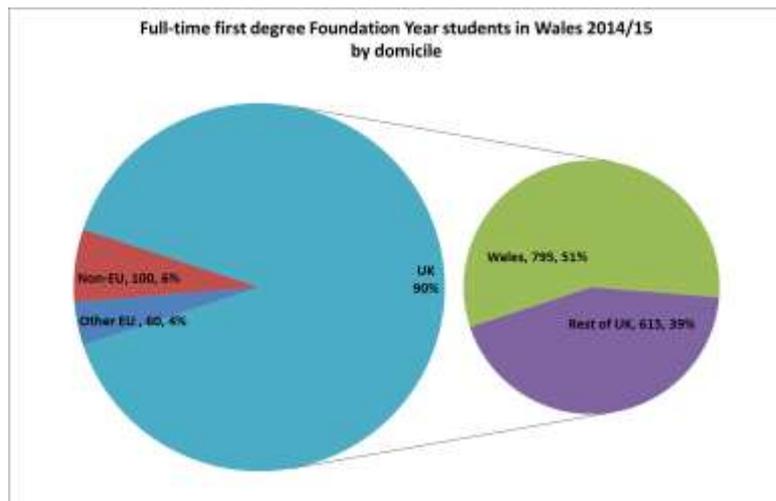
Chart 3



5.12. This percentage is even higher when our estimates of the additional provision (not fully captured by HESA in this analysis) are factored in, since it appears to be all in science, engineering and technology subjects, subjects which typically require significant capital outlay in specialised facilities and equipment, and a learning environment and support infrastructure which is tailored for such students to cope with typically very demanding and intensive study.

5.13. In addition to the Welsh students, there are a significant number of students from other countries. In fact, Welsh-domiciled students accounted for around half of students only in 2014/15.

Chart 4



6. Benefits for students

- 6.1. In our view the Welsh Government has completely undervalued the benefits and value for money of a foundation year at university, and there is a strong policy rationale for continuing to support and encourage foundation year provision in universities.

Student choice

- 6.2. First and foremost, in our view, the removal or reduction of support for foundation year provision would mean a significant loss of choice and opportunity for students. Students consciously choose to study foundation/integrated provision at universities, despite the fee loan debt that the student incurs.
- 6.3. To remove or reduce the provision would also appear to be contrary to the Welsh Government's own policy principles as expressed in relation to the current student support package: *"Our tuition fee policy is based on the fundamental principle that the choice of institution and course for Welsh students should be driven by individual circumstances and need."*⁴
- 6.4. We recognise that the higher education environment and provision is not the right option for every student, and welcome alternative provision that caters for them. There is clear evidence from research conducted by the universities which these students attend, however, that many students believe that university provision better suits their individual circumstances and need, despite the greater cost to them.
- 6.5. Universities in Wales have conducted a considerable amount of research into the reasons that their students choose to pursue foundation year study with them and the perceived

⁴ Minister for Education and Skills, National Assembly for Wales Written Assembly Questions tabled on 8 January 2016 for answer on 15 January 2016, Written response 19 January 2016. (see [here](#)).

benefits, as can be seen from their individual submissions. Students typically cite, for instance, superior facilities, university tuition and an environment which is better suited to them. By contrast, some specifically commented that the further education environment was not right for them, and saw it as too geared towards young students. Some indicated that they would be less likely to have pursued their study at a higher level without the foundation year. As further discussed below, many of these perceptions appear to be supported by other evidence.

- 6.6. For some institutions a significant proportion/number of students enrolled on these courses come from outside Wales – and in particular would be unlikely to apply to further education providers instead.

University environment and facilities.

- 6.7. Many students appear to place a high value on learning in an higher education environment as opposed to a further education environment, and typically benefit from university facilities.
- 6.8. Universities account for more than half of all research and development in Wales, and have a large and thriving portfolio of world-class research. Students typically benefit from the large-scale investment in top-class subject specific facilities that are necessary to support this world-class research and innovation.
- 6.9. Particularly for STEM subjects, there is significant investment in HE facilities and infrastructure, which further education providers cannot currently match and would require significant investment over many years to obtain. Given that the facilities already exist in universities, these programmes are most likely to be provided cost effectively at universities.
- 6.10. Student facilities and support benefit from the size of the higher education sector and from the fact that, in addition to public funding and fee income, universities have been able to generate and reinvest a significant amount of income from other sources.
- 6.11. From our discussions with universities it is clear that all provision is being taught by higher education lecturers (even when the provision is level 3), and is not being franchised out. This means, typically, that students have access to research active staff and remain at the forefront of their subjects and professions.

Integrated learning/learning environment.

- 6.12. Currently, from our research, it appears that foundation year provision in Wales is in many instances a mix of level 4 (HE) and (FE) provision, which means that it is not equivalent in level and content to provision within further education. None of the provision is franchised to other providers and all provision is taught with higher education staff in a university environment, with access to the full range of university facilities and support.

- 6.13. Many students specifically appear to want and benefit from bespoke/integrated programme of learning. They do not want to have to apply separately to enrol at different providers and have courses that do not integrate seamlessly or provide the foundation for later study in their subject so well.
- 6.14. A key feature of learning at university is the diversity of the student body and the global outlook. In contrast to the further education sector, a significant proportion of the student body comes from outside Wales, and from overseas, providing an important international perspective. Just under half of all students on foundation years on full-time first degrees for instance are from outside Wales (see Chart 4).
- 6.15. Teaching and learning at universities in Wales is informed by a significant body of world-class research, which continues to shape and invigorate the subjects which are taught at undergraduate level.
- 6.16. It is clear from the universities research that students value the quality that is associated with higher education provision, and believe that universities – at least for their needs – can offer a better teaching and learning experience. Higher education in Wales has a strong reputation for teaching quality, and is very strictly regulated in terms of the quality of its provision by the Higher Education Funding Council for Wales (HEFCW) and the Quality Assurance Agency (QAA), as part of a UK wide system. A range of UK wide information sources provide students with good information on the quality of education at each university including satisfaction levels, completion statistics and employment outcomes. Statutory measures such as the student complaints procedures and the powers of the Office of the Independent Adjudicator provide students with additional protection. As charities, all universities in Wales are also subject to the additional regulation of the Charity Commission.

Widening access

- 6.17. The assertion in the consultation document that foundation years are contributing little to the widening access agenda appears to be based on little or no evidence. Contrary to this assertion, the HESA data appears to confirm that foundation year or equivalent provision makes a very significant contribution to the widening access agenda.
- 6.18. We understand from HESA data for 2014/15, for instance, that out of the 725 Welsh students on full-time first degrees new entrants on a foundation year around:
- 29% (215) were from **Communities First/Welsh Index of Multiple Deprivation areas**, about 6 percentage points higher than for new entrants not on a foundation year.
 - 44% (320) were from **low participation neighbourhoods**, a percentage point higher than students not on a foundation year.

- Foundation programmes attract a high percentage of **older students**. Over a third (37%) were aged 21 or over, compared to around 29% for those not on foundation year.
- A high proportion on foundation years were **male** - 62% compared to 39% of new entrants in year 1.

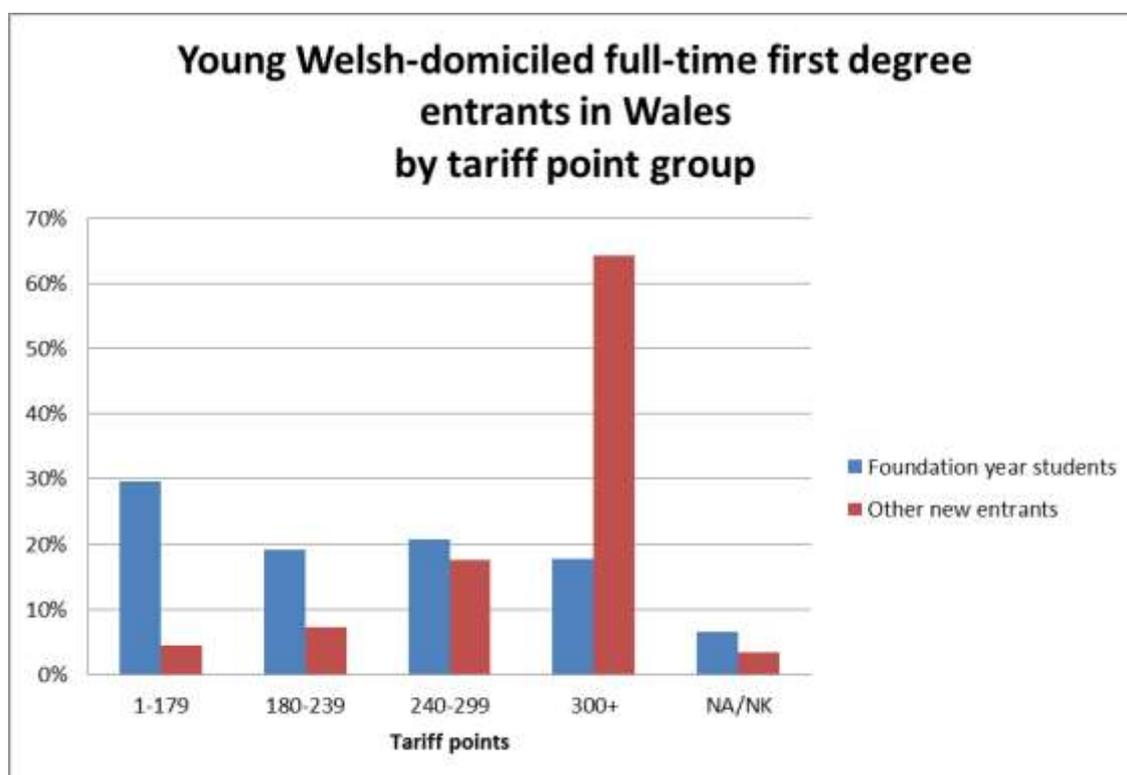
6.19. On the last point, we note in particular that the study on underachievement of young men published by the Higher Education Policy Institute (HEPI) suggests that foundation years recently could be of particular benefit to male students who currently appear to be under-represented and under-achieving in higher education, and that the take up of foundation year provision should be encouraged.⁵

Progression and achievement

6.20. From the evidence that we have been able to identify, foundation year programmes appear to be notably successful at improving student achievement.

6.21. The HESA data shows that, although there is considerable range of levels of achievement prior to enrolment, a comparatively high proportion of foundation year students have lower levels of attainment than other entrants. 4% of new entrants on foundation years did not hold A-levels (or HE qualifications) compared to 1% of other entrants. The following chart illustrates this for Welsh-domiciled students under the age of 21 with A-levels.

Chart 5



⁵ Hillman N. and Robinson N., Boys to Men: The underachievement of young men in higher education – and how to start tackling it, Higher Education Policy Institute (HEPI) Report 84, May 2016. p.9 and 46.

- 6.22. Despite the lower average prior attainment, it appears that the completion rates for foundation year entrants and other entrants are almost identical, with overseas students in particular benefitting from the foundation year (a completion rate of 95% for new entrants on foundation years, compared to 87% for students who did not have a foundation year).
- 6.23. The most significant benefit, however, appears to be in terms of the degree outcome. We have not been able to analyse this in the foundation year data, but if we look at the HESA data for extended undergraduate degrees, for instance, (albeit a small sample of only 60), it appears that 100% of students in 2014/15 achieved a first or a 2:1 in Wales, compared to the 66% for students on first degrees without the extended year. A very high proportion of firsts and 2:1s is also seen in previous years. A number of the individual submissions from universities have also highlighted that this appears to be the case at their institutions.
- 6.24. This is not surprising for policy makers. Evidence in academic literature and formal studies, albeit rather limited, also appears to support these findings. For instance, separate studies in other countries have also found that students on foundation years perform better than students who enter a programme directly.⁶ One of the studies concludes that the foundation programme has a far-reaching effect on all aspects of the students' lives and not only on their academic performance, highlighting that students themselves place great importance on the non-academic benefits of study in HE.⁷ Many of the key studies on student attrition and retention in higher education, have frequently stressed the importance of a wide set of factors for successful continuation of study which suggest that, for some students, easing the transition into HE in terms of coping with the learning environment and non-academic aspects of HE study could be critical.

7. Cost and value for money

- 7.1. The Welsh Government's assessment of the value for money appears to be flawed. In our view, the reduction or removal of foundation year provision at universities is unlikely to ease pressure on the Welsh Government's funding. If it does not result in the loss of students from the higher education system altogether, it is more likely to require significant sunk investment costs in higher cost substitutes (where further education colleges are able to offer it all). It is also likely to undermine STEM provision at other levels in universities.
- 7.2. In terms of the budgetary implications for the Welsh Government we note that enrolments on full-time undergraduate programmes overall have not grown over this period in Wales (and were subject to student number limits/maximum fee grant controls until 2014/15).

⁶ See for instance: Mabila T.E et al., The role of foundation programmes in science education: The UNIFY programme at the University of Limpopo, South Africa, International Journal of Educational Development, March 2006; Wood L.A., Lithauer P., The 'added value of a foundation programme', South African Journal of Higher Education, vol.19(5), 2005.

⁷ Wood L.A., Lithauer P., op cit., 2005.

There is evidence in universities individual submissions to suggest that it is other forms of higher education provision rather than further education provision that are most in competition with foundation year provision in universities (see below). This means that growth on foundation years programmes at universities has had little or no net effect on the Welsh Government's student budget overall.

- 7.3. The consultation document suggests that provision through further education providers would be cheaper. However, this ignores the very significant cost of investment that further education providers would have to make to provide equivalent provision/facilities, particularly in STEM subjects.
- 7.4. As confirmed by the UK Wide costing exercise (TRAC), provision in science, engineering and technology areas is typically very expensive, and is not even covered by the maximum full-time undergraduate fee level of £9,000 at the moment, i.e. universities are effectively subsidising it. As identified above, nearly three-quarters of students on foundation years are studying in these areas, and more if equivalent provision is also taken into account. The subject related costs of teaching appear to range from around £8,840 to £15,400 for STEM subjects in these areas in today's prices.
- 7.5. We should also note that due to current fee plan legislation, universities can only use around 70% of their additional fee income to meet subject-specific teaching costs, i.e. the teaching income is limited to around £7,500. However, in addition to the universities investment in its teaching provision, 30% of the additional income is invested into widening access and promotion of higher education.
- 7.6. TRAC data would suggest that the costs of teaching provision are lower for the two main non-STEM areas, administrative and business studies and social studies – around £6,940 and £6,480 respectively. However, there is typically variation within these categories and the actual cost base of individual programmes could vary significantly. It should also be noted that the TRAC analysis only relates to the subject-specific teaching costs, and the wider costs associated with teaching, and other institutional costs are not included, as would be necessary for an assessment of longer-term sustainability.
- 7.7. Providing foundation year/integrated provision within higher education, means that it currently benefits from critical mass and economies of scale. Enrolments on foundation programme from students across the UK and overseas, which universities are particularly good at attracting, means that these programmes have a greater chance of being sustainable – as well as bringing valuable inward investment into the Welsh economy. In addition, universities benefits from more general economies of scales, such as greater purchasing power and procurement efficiencies.
- 7.8. There would also be exit costs for higher education, if foundation year provision is scaled back or removed altogether, which could affect university staff as well as students.

7.9. The availability of student finance for Welsh students would affect universities' overall funding and competitiveness compared to other parts of UK. It could simply mean that it drives Welsh students to take up courses outside of Wales and prevents students from outside Wales from enrolling at Welsh universities.

Competition with alternative provision

7.10. The consultation document suggests that higher education providers are offering such provision at the expense of further education providers. Contrary to this suggestion, there appears to be no evidence that these students would or could transfer to further education provided courses instead, or of clear alternatives being offered by further education providers at the moment, or evidence that other providers would wish to make the substantial investment required to offer similar provision. The clear danger is that, if foundation years in HE are removed or reduced, these students would simply drop out of higher education.

7.11. From our discussions with universities it appears that in a number of cases, rather than compete with FE level provision, this provision is competing with other HE level provision. From individual submissions it can be seen, for instance, that programmes with a foundation year have taken over from 2+2 arrangements and other higher education alternatives.

8. Question 2 – Which of the four proposals do you think should be implemented? Why?

8.1. In our view the Welsh Government should continue to provide the current support (Option A). As evidenced above, we believe that the consultation document is wholly mistaken in its assessment of the cost and value of the provision of current foundation year provision.

8.2. Removing support for foundation year (Option D), as argued above, would be a significant detriment for a small but important group of students, denying them the choice that the fee grant was designed to retain, and a route through higher education that offers, for them, the best chance of success.

8.3. Option B, reducing the level of fee support, would increase the difficulty of covering the cost of such provision, particularly given the extent of STEM provision, and place the long-term sustainability of these opportunities for students at risk. There is no evidence to suggest that the cost of provision of foundation years is less than for other years. In some instances, it has been brought to our attention that foundation year courses in universities in Wales are already offered at a lower rate than other years by providers. However, it should be stressed that foundation years are in general subsidised by providers. An analysis of teaching costs by subject points to the fact that the large majority of this provision must be subsidised by the provider even at the £9k fee level.

8.4. In our view, there are particularly strong arguments in favour of retaining full support for STEM subjects (Option C). The contribution of foundation year provision for STEM subjects

in particular should be recognised, and provision actively encouraged in line with the science for Wales agenda.

- 8.5. There are also very good grounds, however, for continuing to allow students to choose foundation study at university in other subject areas. Removing or reducing support for these areas will deny opportunities for students for whom a foundation year at university best suits their needs. Foundation year study in non-STEM subjects currently comprises a low percentage of foundation year study, which in itself accounts for a very small proportion of overall full-time undergraduate study (less than 2%).
- 8.6. We wonder if there are any real savings to be made in non-STEM subjects given the small numbers, particularly when this is offset by the potential costs of implementation of a policy which attempts to differentiate courses on the basis of subject categories. Implementing a policy based on the subject area classification is unlikely to be straightforward or without administrative cost for either the Welsh Government or the HE sector. Courses rarely fit neatly into coding categories, even though this must be done for data purposes, and the nature of provision can vary significantly within categories. This means that in some instances the classification could lead to rather unfair decisions for students.
- 8.7. Since overall student numbers are monitored, and have been made subject to student number controls in years that the Welsh Government has felt necessary, it is misleading to suggest that the cost of the foundation year provision is additional to the Welsh Government. Such provision has a negligible effect on the full-time undergraduate numbers overall.
- 8.8. We can see no evidence that Options B to D would deliver the savings identified by the Welsh Government.
- 8.9. In light of the Welsh Government's concerns, however, we recommend HEFCW keeps growth and fee levels in non-STEM foundation year courses under review. As with all courses, we would expect HEFCW to continue to approve fee plans where fee plan commitments reflect the levels of fees charged for programmes.

9. Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

- 9.1. No. Paragraph 30 does not provide a definition. It only indicates that “a definition is likely to consider the interaction between: the attainment of the student; the level of the provision; and the additional period of study.”
- 9.2. It is in fact very difficult to ascertain from the rest of the document, precisely what provision and definitions the Welsh Government has in mind. The closest the consultation comes to offering a definition is when it refers to ‘foundation years which extend the duration of some undergraduate degrees by adding a year of study’.

- 9.3. It is unclear, for instance, whether the Welsh Government is including just undergraduate courses. The text only refers to undergraduate degrees, but confusingly in Figure 1, for instance, the Welsh Government has chosen to include both undergraduate and postgraduate courses. For the purposes of this consultation, we have assumed that the Welsh Government is currently only looking at undergraduate courses, since the set of considerations around postgraduate courses or integrated undergraduate/postgraduate courses could be considered to be completely different, and the Welsh Government's concerns as expressed in this document appear to be only relevant to undergraduate courses. There are also significant issues in relation to the professional body requirements and accreditation that would require widespread consultation on any proposed change. If any changes are being contemplated in this respect, however, we would expect this to be made clear and the subject of formal consultation too so that we have an opportunity to comment.
- 9.4. Similarly, it is unclear whether the Welsh Government intends to review arrangements for part-time provision. Again, we have assumed, based on the indications in the consultation document, that the proposals are intended relate to full-time undergraduate provision. The issues relating to the impact for student support are clearly different for full- and part-time provision, since there has been no comparable fee increase for part-time provision in Wales and students are not supported by tuition grant i.e. the financial support for part-time students is substantially less than for full-time students at present. Part-time provision in Wales also provides a distinct opportunity for distance learning which is very important for a particular group of students. As for postgraduate study, there are also significant issues in relation to the professional body requirements that would also require widespread consultation. As stated in our comments at the end (see 11.7) and recognised in the Welsh Government's concurrent consultation on postgraduate and part-time support, there is a very strong rationale for increasing support for part-time higher education in general. If any changes are being contemplated in relation to support for part-time provision we would expect this to be subject to separate consultation in the light of the outcomes of the Diamond Review, and it is essential that in the interim no adverse changes are made that could affect foundation year provision or equivalent by part-time study or distance learning.
- 9.5. See also our comments above under Question 1 (paragraphs 5.1 to 5.13) on the data presentation.
- 9.6. As we currently understand the student support regulations,⁸ eligible students may qualify for support (i.e. Welsh Government loans or grants) in connection with 'designated courses' as follows:

⁸ Student Support Regulations (Wales) 2015, in exercise of powers under s.21 of the Teaching & Higher Education Act 1998.

- Designated courses include full-time undergraduate course⁹ provided by a publicly funded educational institution of at least one year in length up to the ordinary length of the course plus an additional year (plus any repeat years for compelling personal reasons).
- If a student has studied a previous full-time undergraduate (or postgraduate initial teacher training) course, his/her entitlement is reduced for each year of attendance on their previous course. This would appear to mean that a student could be funded for two separate courses at HE level in theory: for instance, for the full duration of an ordinary length degree course (3 years) and an additional year of attendance on a previous/free-standing full-time undergraduate course.
- Students also need to meet a range of individual eligibility requirements, such as UK/EU domicile. Those who already hold a first degree are not entitled to support – unless the qualification was attained as part of the current course i.e. the two awards are considered to form a single course.

9.7. Eligibility for statutory student support under these regulations only extends to higher education level courses. Free-standing further education level provision such as Access to HE courses, for instance, would not qualify for HE student support and fee arrangements.

9.8. Reconciling the student support rules neatly with the data used by HESA, or by HEFCW for funding purposes or, for instance, the National Framework on Academic Standards is not straightforward. The latter, for instance, specifies that programme outcomes should reflect, in a holistic way, the qualification descriptor for the final level reporting data.

10. Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

10.1. Removing or reducing support would undo much of the positive impact that a carefully built portfolio of foundation degrees in the sector has offered.

10.2. As discussed above, any policy changes relating to a foundation year or equivalent would primarily affect students on science, engineering and technology provision. This would appear to be at odds with the Welsh Government's delivery of its strategic agenda for science in Wales.¹⁰

⁹ First degree, DipHE, HNC/HND, CertHE, ITT course, and further training for youth and community workers. It also includes a professional examination course or any other course which is of a higher standard than A-level or equivalent but for which a first degree is not normally required. The courses must be wholly provided in the UK by a publicly funded educational institution in the UK.

¹⁰ Welsh Government, Science for Wales: A strategic agenda for science and innovation in Wales, March 2012.

10.3. It would also disproportionately affect students from Communities First Areas, from low-participation neighbourhoods, older students, and male students. In other words it is likely to have an adverse impact on the sector's widening access agenda.

11. Question 5 – 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.

11.1. Finally, the Welsh Government concerns appear to be driven in large part by budgetary considerations. We should be clear that provision that offers a successful transition into higher study in HE should not be placed at risk by a lack of adequate funding for either the further education or higher education sector.

11.2. The lack of participation in Wales at HE level compared to the rest of the UK is arguably the single most important educational issue for Wales now to address. The Welsh Government's most recent statistics showed that 36% of adults of working age in Wales held higher education qualification compared to 39% in the UK as whole – the biggest percentage point gap between Wales and the rest of the UK at any level of educational attainment.¹¹ The most recent analysis of the Universities and Colleges Admissions Service (UCAS) showed that the application rates of 18 year olds from Wales for full-time higher education were the lowest of any UK country at 32.2% – more than 4 percentage points lower than the application rate of 18 year olds in England as a whole (36.6%) and equal to the lowest rate of any region within it.¹²

11.3. Higher education opportunities can have a massive impact on individuals. The further up the educational ladder that a person reaches, the greater the return to the individual and the greater his or her contribution to the economy and society. An undergraduate degree increases an individual's chances of employment, and increases marginal earnings by 27% on average compared to the possession of two or more A-levels. Higher levels of study bring even greater returns on learning.¹³

11.4. It is estimated that over 80% of new jobs created by 2020 will be in occupations with high concentrations of graduates.¹⁴ The UK Commission for Employment and Skills (UKCES) in particular identified significant future demand for corporate managers; science, technology, engineering and mathematics (STEM) professionals; teaching and research professionals; and business and public service professionals.

11.5. The Welsh Government needs to find ways of supporting effective routes into higher education offered both universities and others to allow students to make the choices that are

¹¹ Welsh Government, SDR 50/2016, Levels of Highest Qualification held by Working Age Adults, 2015 (20 April 2016), Table 3 (see [here](#)).

¹² UCAS, Application rates by the January deadline, 4 February 2016 (see [here](#)).

¹³ BIS Research Paper 45, The Returns to Higher Education Qualifications, June 2011.

¹⁴ Universities UK, The Funding Challenge for Universities – Higher Education a core strategic asset to the UK, 2013 (see [here](#)).

right for them. All forms of viable provision which successfully cater for the individual needs and circumstances of students should be encouraged in this respect.

11.6. Work on addressing the shortage of skills needed to succeed at higher levels of education needs to continue at schools and further education colleges as identified by the Welsh Government in Science for Wales in particular. In short, the Welsh Government needs to deliver on its commitment to its strategic agenda for science in Wales¹⁵ by investing in science education in all sectors. It should also apply the fundamental principles it outlined in establishing its current student support policy to enable student's to have a choice.

11.7. In addition, the current support for growth in part-time provision, including foundation years, represents a major missed opportunity. Part-time provision is particularly suited to enable access and participation in higher education by students from all backgrounds and circumstances. Greater parity of support should be extended to enable foundation year provision. We hope that this will be addressed through the outcomes of the Diamond Review.

11.8. In the light of the above evidence, we believe there will be significant difficulty for Ministers in communicating the value of the proposed removal or reduction of foundation year support at universities to Welsh students faced with difficult and important decisions about their future careers and route through education, often at time of clearing, who will wonder why applicants from other parts of the UK are able to access support for study in Wales or elsewhere in the UK when they are not.

11.9. We are happy to confirm that this response may be made public, on the internet or in a report.

Universities Wales
26 May 2016

¹⁵ Welsh Government, Science for Wales: A strategic agenda for science and innovation in Wales, March 2012.