

**Support for postgraduate study
and part-time engineering, technology or computer science degrees
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 consultation published on 3 March 2016.¹

3. General comments

- 3.1. We agree with the Welsh Government's assessment that there is a convincing rationale for providing financial support for postgraduate study in Wales, and we welcome the proposal to provide support on similar terms to arrangements for England for 2017/18. In particular, we must ensure that the issues that prevented this policy being adopted for 2016/17 despite the best attempts of the Welsh Government and sector are addressed. This includes the issue of the support for Welsh arrangements by the Student Loans Company (SLC).
- 3.2. Similarly, we think that extending eligibility for support for part-time provision, by providing an exception to the 'equivalent level qualification' rule for science, engineering and technology and mathematical subjects (STEM) from 2017/18 would help to bring the opportunities for Welsh students in line with those in England, and address a much needed gap in support for part-time provision at present.
- 3.3. We appreciate that in the short term the viable policy options in this area are partly determined by the nature of devolved funding arrangements. In the longer-term we look forward to working with the Welsh Government to identify the best way of providing sustainable support for these important areas, in the light of the Diamond Review.
- 3.4. We provide more detailed comments in response to the specific questions in the consultation in the paragraphs below.

¹ See [here](#).

A. Support for postgraduate study

4. Question 1 – Do you agree that support should be provided for postgraduate study?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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- 4.1. We agree with the Welsh Government proposals to provide support for postgraduate study. As highlighted in the consultation, postgraduate study plays an important part in bringing higher levels skills to the economy, increasing social mobility, and significantly increases an individual's employment and prospects and life-time earnings compared to other levels of education.
- 4.2. The postgraduate support package is all the more welcome given the further reduction of the HE budget for 2016/17 including resulting in the removal of all grant allocations for postgraduate provision from 2016/17 as confirmed in the most recent grant circular of the Higher Education Funding Council for Wales (HEFCW).²
- 4.3. Universities and the Welsh Government worked together to implement loan arrangements for 2016/17, but were unsuccessful primarily it seems due to lack of capacity at the Student Loans Company to implement an arrangement for Wales. We know that this has been discussed by the Welsh Government and highlighted as an issue in the National Assembly for Wales. Whatever support package is proposed it must be a priority to ensure that it can be implemented for 2017/18.

5. Question 2 – Do you agree with the support package as outlined? Is there any aspect you would change? Why?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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- 5.1. In general, we agree with the support package as outlined as an interim policy, recognising that in order to avoid the risk of additional costs for Wales and enable implementation through the SLC, the package may need to be approved by Treasury as similar to England's in 2017/18. We look forward to identifying a longer-term arrangement in the light of the Diamond Review, however.
- 5.2. We would also welcome greater clarity or consideration of a number of issues.
- 5.3. The support is proposed for HE providers based in Wales who are charities AND have their own Degree Awarding Powers (DAPs) only. It is not clear how this applies to partnership arrangements e.g. providers providing on behalf of regulated institutions, and further guidance would be welcomed.

² HEFCW Circular W16/16HE, HEFCW's Funding Allocations 2016/17, May 2016 (see [here](#)).

5.4. The proposals would allow Welsh students to be supported for study at 'authority funded' providers based in the rest of the UK. This doesn't appear to require them to be charities/have their own degree awarding powers, unlike providers in Wales however which raises potential issues about a level playing field which we think should be further considered.

5.5. Table 3 on p.12 says that the proposal is to include 'research degrees'. Could we clarify if this intended to mean all research degrees (including doctoral study), or 'research masters degrees' only? The latter seems to be in line with England and is implied by para 40. We would welcome all further support that can be drawn from Treasury (i.e. AME) funding.

5.6. We would welcome confirmation that graduates from undergraduate-level four year integrated Masters programmes would be eligible for support for separate postgraduate study. For some areas, such as MPharm degree, this is likely to be standard. We would wish to ensure that there is parity with the English scheme in this respect (see also 5.8 below).

5.7. If there is scope to vary the criteria, either in the immediate future subject to affordability/Treasury rules or in future, we would welcome the Welsh Government exploring in particular:

- Reducing the threshold level of intensity of study e.g. to around 25%. At the moment, only provision studied at 50% intensity or greater is included. This excludes much part-time provision and potentially disadvantages certain types of provider and particular groups of student.
- Removing the exclusion for those with previous qualifications at postgraduate level. In line with the current proposals for part-time support (below), this could for instance be introduced for strategically important areas such as science, engineering, technology and mathematics (STEM) subjects.
- Extending support to postgraduate programmes more generally, not just Master's degrees. For instance, the PGDip students currently appear to be ineligible, but extending the support would make sense as many are undertaking the taught element of a Master's degree without the dissertation.

5.8. Finally, we note that the current consultation concerns support for postgraduate taught programmes only at this stage. We would also welcome the Welsh Government ensuring that support for Welsh students to pursue study at doctoral level are reviewed in the light of further proposals in England to introduce loans of up to £25,000 from 2017/18. Arrangements for Wales will also need to be reviewed and implemented by 2017/18 to avoid Welsh students from being disadvantaged.

6. Question 3 – Do you think any particular groups would be disadvantaged by this policy?

6.1. We have not identified any particular groups that would be disadvantaged by the introduction of the postgraduate policy, but the potential costs of the policy could have an impact on other areas.

- 6.2. We support in principle the extension of support for postgraduate and part-time study. However, any changes beyond what can be afforded under devolved funding rules that may have an impact on the budget for higher education in Wales would need to be discussed in the light of the Diamond Review. Given the very tight budget settlement for HE in 2016/17, any further reductions would directly impact on the remaining funding for critical priority areas including research, expensive subjects, and part-time undergraduate provision. We welcome the proposal of an interim solution that does not place these areas at further risk in the interim, and look forward to working with the Welsh Government on a longer-term solution pending the outcomes of the Diamond Review.
- 6.3. We understand that under devolved funding arrangements, the cost of the loan principal would be met from annually monitored expenditure (AME) i.e. by the UK Treasury. However, if Wales adopts its own scheme there is a risk that it will have to bear the cost of any additional expenditure. We assume that Wales will ensure that Treasury approves its scheme as sufficiently similar to England's to avoid this.
- 6.4. Also, we understand that the cost of the loan itself (i.e. the RAB charge), would come out of the Welsh Government's departmental expenditure limits (DEL) which make up the Welsh budget. The main risk that we can see is that the scheme will not be zero cost as intended in England, which would have a knock-on impact for other budgets in Wales.
- 6.5. Finally, the payment profile proposed looks quite heavily weighted to the third instalment which may be an issue for some universities (and potentially increases the need for cash reserves). We would welcome the Welsh Government giving further consideration to whether or not the profile could be managed to enable more even payments.

B. Previous study and support for part-time study

7. Question 4 – Do you agree that it is beneficial to extend eligibility to statutory support to students with equivalent level qualifications on these engineering, technology or computer science courses?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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- 7.1. Yes, we agree that it would be beneficial to extend eligibility to statutory support to students with equivalent level qualifications on science, engineering, technology and mathematics (STEM) subjects.
- 7.2. As recognised in the consultation document, STEM subjects are of high strategic importance to the economy, and this would help to support the Welsh Government's strategic agenda for science. It will also help to provide much needed support for the part-time mode of study which has not benefited from the changes in the full-time undergraduate fee and funding changes introduced in 2012.

8. Question 5 – Do you think any particular groups would be disadvantaged by this policy?

- 8.1. We have not identified any particular groups that would be disadvantaged by the introduction of this policy. With any policy determined on grounds of subject classification, however, there is a risk that student support depends on small or technical differences in classification.
- 8.2. We think that this proposal would help to bring the opportunities for Welsh students in line with those in England, and address a much needed gap in support for part-time provision at present.
- 8.3. We are aware that the STEM subjects can be defined in different ways. Subject to Treasury limitations on adopting a different approach, we would like to see that the Welsh Government ensures there is as broad a subject coverage as possible.

9. Question 6 – Are there any other courses you believe should be considered for future inclusion in this scheme?

- 9.1. We appreciated the limits of the devolved funding arrangements that the Welsh Government has to work within in the short term. In the longer-term we look forward to working with the Welsh Government to identify the best way of providing a sustainable solution to the funding and students finance arrangements for part-time provision in Wales, in the light of the Diamond Review.
- 9.2. Part-time study must form an important part of future higher education provision in Wales, if Wales is to keep up in the global race towards higher skilled economies. It plays a particularly important role in upskilling and reskilling agendas and for continuing professional development, and has a central role in any skills strategy. Likewise, part-time opportunities can provide an important way into higher education for students from disadvantaged backgrounds, contributing significantly to the widening access agenda and to community development and economic regeneration in disadvantaged communities. Part-time higher education can both widen access to higher education and develop skills within the Welsh workforce.

10. Question 7 – 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.

- 10.1. As a final comment, we note that the Welsh Government intend to lay draft regulations before the National Assembly for Wales early in 2017. We would welcome discussion of an early or consultation version of this prior to introduction so that we may be as helpful and supportive as possible at the right point in the process.
- 10.2. We confirm that this response may be made public, on the internet or in a report.