The Open University in Scotland

The Open University in Scotland is the leading provider of flexible learning and embraces a core set of values, which make it the most distinctive Scottish higher education institution.

The Open University in Scotland is open to people, places, methods and ideas, and promotes educational opportunity and social justice by providing high quality university education to all who wish to realise their ambitions and fulfil their potential.

Key facts about The Open University in Scotland:
- Ranked first for overall satisfaction for the past five years by the National Student Survey;
- For every £1 of public funding received, we generate £5 for the Scottish economy;\(^1\);
- Around 25% of our students do not have standard university entrance level Qualifications;
- Over 30% of our students live in households with an income below £16,000;
- Our students live in virtually every community in Scotland;
- The median age of our students is 32;
- In 2009/10 we granted 1,780 applications to transfer credit from other institutions.

The Open University is the leading provider of part-time higher education in Scotland, and currently offers more than 500 modules to over 16,000 students.

The Open University in Scotland receives teaching funding from the Scottish Funding Council and is a member of Universities Scotland.

1. EXECUTIVE SUMMARY

The Open University in Scotland welcomes the Government consultation document Building a Smarter Future, particularly its guiding principles which mirror the core values of The Open University. The key points from our response are summarised below.

1.1 Funding

Part-time study must be a central part of the ‘Scottish solution’ to the funding of higher education given the vital role it plays in economic recovery, workforce development, social mobility and serving remote communities.

The Open University in Scotland strongly supports a credit based funding model which would facilitate the flexibility required by students who wish to study below full-time intensity and facilitate the following aspirations in the consultation paper:

- Transitions between HEIs
- Accelerated degree courses
- Advanced entry (through credit transfer)

\(^1\) Economic Impact of The Open University in Scotland, Biggar Economics 2011
• Learner led system
• Articulation between colleges and HEIs
• Greater links with businesses

If current financial and budgetary constraints pose a challenge to implementing a credit based funding system immediately, The Open University in Scotland has independently corroborated evidence that there is considerable scope in the interim to build on the existing ILA scheme to offer a cost neutral means of supporting more HE part-time students with their fees.

The Open University in Scotland strongly believes all students who have chosen to study with us at full-time intensity should receive the same level of support in terms of free tuition and student support as their counterparts in other Scottish HEIs.

The anomaly, whereby The Open University in Scotland is the only HEI in Scotland that is funded on completion rather than on registration, needs to be addressed so all HEIs shoulder the same financial risks.

1.2 Learning, teaching and access
The Open University in Scotland believes that supporting the sector to recognise and accredit prior learning would be an effective use of funding as this could significantly reduce the learner journey.

The Open University in Scotland actively supports articulation, but believes the policy would benefit from greater recognition that not all students progressing from colleges to HEIs wish to study at full-time intensity, stay within the same subject area, or want to progress immediately from an HN to a degree qualification.

The Open University in Scotland does not believe it is desirable or practical to judge the quality of teaching in terms of graduate employment opportunities, rather students who participate in the Student Satisfaction Survey remain better placed to assess the quality of the teaching they have received.

1.3 Student support
The Open University in Scotland believes there should be parity between the financial support available to full-time and part-time students to support students whose circumstances mean they would prefer to study below full-time intensity.

For reasons of equity and cost-effectiveness, The Open University in Scotland believes DSA should continue to be allocated to individuals.

1.4 Research
The Open University does not support further concentration of research funding or moves to focus research funding from SFC on Scottish Government priority areas.

1.5 Shape and structure
The Open University in Scotland supports a map of provision which will ensure that the highest quality of HE is offered to students and highlights the choices available for both courses and modes of study.

The Open University in Scotland believes that consideration should be given to a sector-wide support service for students who have withdrawn.
The Open University in Scotland supports the current tripartite relationship between universities, the Scottish Government and the Scottish Funding Council, and believes a single funding council for further and higher education should be maintained.

2. INTRODUCTION
The Open University in Scotland welcomes the opportunity to respond to the Government's consultation paper, *Building a Smarter Future*. We particularly welcome the acknowledgement of the contribution that higher education makes to all aspects of Scottish society and the recognition that a sustainable funding solution must be found to ensure the sector can continue to play its role in building a successful Scotland.

Given that four in ten higher education students in Scotland study part-time, and with the increased emphasis on life-long learning, we believe that supporting education below full-time intensity must form an integral part of the ‘Scottish Solution’. More than ever, Scotland needs to incentivise a strong and vibrant part-time sector to provide the diversity and flexibility of provision that students require, to grow the economy through supporting re-skilling and up-skilling, and to bring more people from non-traditional backgrounds into higher education. The publication of *Building a Smarter Future* provides a tangible opportunity to tackle the increasingly archaic and anachronistic divide between full-time and part-time study and to introduce progressive moves to inject greater flexibility into the system.

The Open University in Scotland’s response to the consultation, set out below, focuses on those issues that are pertinent to part-time students, and the issues affecting students at The Open University. The response is structured around the paper’s chapter headings, although we have prioritised ‘Funding’ and ‘Student Support’ ahead of other issues.

We recognise that there is urgency in respect of some aspects of change, but believe these should be geared towards a new model, progressively introduced over the longer-term.

The Open University in Scotland strongly supports the guiding principles of the consultation paper – open to all, flexible, learner centred, diverse, excellent, international, well-led. These principles run through the core of what The Open University does and we have used our response to highlight how these principles underpin our activities.

3. FUNDING
The Open University in Scotland welcomes the commitment of the Scottish Government and other key stakeholders to find a sustainable funding solution for Scotland’s HE sector to guarantee it remains competitive within both a UK market and a global marketplace.

3.1 State retains the prime responsibility
The Open University in Scotland supports the overall guiding principle in the paper and the position of Universities Scotland that the Scottish Government should be the primary provider of funds to the sector for teaching Scottish students, thereby ensuring that higher education remains open to everyone who has the potential to benefit from it.

While we recognise the urgency of establishing a model that ensures adequate funds for HEIs from AY 2012/13 onwards, we strongly support the acknowledgement in the
paper, that the solution must not be a ‘bolt-on’ addition to the current arrangements, locking the sector into a system, which reduces flexibility. Instead, the current consultation must ultimately lead to a more flexible system which is centred on the needs of the learner.

3.2 The Value of Flexible Study
A higher education system that supports and incentivises individuals to study up to and including full-time intensity, and does not focus almost exclusively on full-time provision, is better placed to meet the requirements of today's students and employers, as well as providing the flexibility to meet the wider educational, social and economic priorities of the Scottish Government.

Specifically, the flexibility offered by part-time study leads to the following benefits:

i) Raises the skills level of the workforce
The majority of part-time undergraduates study for vocational and professional qualifications, with a stated aim to further their careers. As the vast majority of part-time students are in work, most are able to immediately apply the skills and knowledge learnt on their courses to their jobs and bring real-time experience to their studies.

Moreover, employers believe that employees studying part-time have the skills and knowledge that are equal to or better than those who gain their qualifications on full-time courses.²

ii) Promotes wider access to higher education
Part-time study extends educational opportunities to many people who, due to their particular personal circumstances, would otherwise be excluded from higher education.

iii) Recognises the changing demographics and incentivising lifelong learning
The reduction of employment opportunities due to the current downturn has led to a “false boom” in the rise in applications from Scottish school leavers. However, the level of applications that Scottish HEIs have seen in the last few years from young applicants is not likely to be sustained once the economy starts to recover. The sector therefore needs to be prepared for greater demand in the future coming from mature students seeking to re-train or up-skill and those wishing to participate in lifelong learning. Many of these applicants will want more flexible provision offering the option to study below full-time intensity.

Despite the rhetoric from different governments about promoting lifelong learning, systems remained focused on the school-leavers' learning journey at the expense of the potential paths of other sections of the population. Now is the time to take a comprehensive look at how system and structures could be adapted to genuinely facilitate and support lifelong learning.

3.3 Credit based funding supports greater flexibility
The Open University in Scotland believes that a credit based funding model is essential, to support learners move with relative ease between different modes of study and different institutions, if the ambitions in the consultation paper for greater

² Employer perspectives on part-time students in UK higher education Mason, G. HESCU, Manchester 2010.
flexibility are to be realised. Indeed, it is hard to see how some suggestions such as students undertaking accelerated degree courses (i.e. studying above 120 credits a year), could be progressed without implementing a credit based system.

To date, the opportunity to study below full-time intensity in Scotland has been constrained by funding arrangements which incentivise full-time study. Presently, part-time students pay their fees up-front and largely out of their own pockets, while full-time students do not have to pay tuition fees. (The inequity of these arrangements is compounded by the limited amount of financial support available to part-time students, as outlined more fully in Section 5). As a result, it is presently more financially attractive to study full-time, for those students who are able to do so, even if their preferred choice were to study below full-time intensity.

The divide between full-time and part-time study in Scotland contrasts sharply with systems in other developed countries, which draw no distinction between modes of study. Indeed, it is ironic that while Scotland has been at the forefront of developing a credit transfer scheme – the Scottish Credit and Qualifications Framework – that facilitates greater flexibility for learners, we do not use the framework to underpin a credit-based funding model. The Higher Education Funding Council in Wales has successfully used a credit based funding system since it was established in 2005.

3.4 A ‘Scottish solution’ which incentivises part-time study

The Open University in Scotland recognises that the financial and budgetary constraints under which the Scottish Government is working to identify and implement a ‘Scottish solution’, poses a significant challenge to implementing a credit based funding system immediately. However, we strongly recommend that in the urgency to implement a sustainable funding model, a system is not perpetuated, which upholds the increasingly artificial divide between full-time and part-time study. Instead, serious consideration must be given to establishing funding arrangements which can be built on at a later stage to offer more students the flexibility required to study at a place, time and rate that fits their needs.

The Open University welcomes the financial support that has been made available in recent years to part-time students on low incomes, and to HEIs to incentivise part-time provision. However, we believe that due to different schemes being established at different times to support part-time study, there are now various funding streams held by different agencies, not being used to their full potential. Arguably, this is also causing confusion about the level of support that is currently available to students studying below full-time intensity. For example, there is a Part-time Fee Waiver Scheme for individuals in receipt of benefits or living in low-income households; the Individual Learning Account (ILA) scheme for individuals studying at a particular level of intensity, with an income below £22,000; and the Part-time Incentive Premium offered by the Scottish Funding Council to some HEIs to support part-time provision.

The Open University believes that the funding for these schemes could be used much more effectively by rolling the budgets together and offering individuals earning below a particular threshold a contribution towards part-time study. For example, a graduated ILA scheme, which built on the current system, would provide individuals, studying below full-time intensity at an HEI with a payment to buy different amounts of credits for higher education, based on an their income and their level of study intensity.
An independent report by Biggar Economics\(^3\) has demonstrated that the cost of such a scheme, using an income threshold of £30,000, would be less than £10M a year, assuming there was no change in demand for part-time study or £15.4M a year if there were an assumed 25% increase in demand for part-time places.

Such a scheme would maintain the progressive element of the Part-Time Fee Waiver scheme but would offer a wider range of individuals, studying below full-time intensity, greater certainty about the level of contribution they would receive towards their tuition fees.

### 3.5 Funding Anomalies
The following funding anomalies which apply to The Open University in Scotland and its students need to be addressed as part of the current consultation:

**i) No financial support for students studying at full-time intensity**
Students who have chosen to study at full-time intensity with The Open University in Scotland do not receive the same level of support in terms of free tuition or student support as their counterparts in other Scottish HEIs. With the number of full-time students at The Open University in Scotland increasing, this issue needs to be addressed urgently, to support those full-time students who choose, or whose circumstances or location requires them, to study through the flexible delivery mode offered by The Open University.

**ii) Outcome-based Funding**
The Open University in Scotland is the only Scottish HEI to be funded on completion rather than on registration. The Open University in Scotland is not strongly minded about whether the sector should move to outcome based funding, only that there should be a level playing field so that all HEIs are subject to the same opportunities and challenges.

However, it is worth noting the concerns raised in Universities Scotland’s response that outcome based funding for teaching could create perverse incentives, such as discouraging HEIs from taking risks when recruiting students from deprived areas.

This funding anomaly needs to be addressed to ensure The Open University in Scotland is not the only HEI shouldering the additional financial risks associated with outcome based funding, particularly as a large proportion of our students come from non-traditional backgrounds and require greater support at a higher cost to facilitate completion.

### 4. LEARNING, TEACHING AND ACCESS
The Open University in Scotland very much welcomes the strong emphasis on flexibility within the Learning, Teaching and Access chapter of the consultation paper. Promoting greater flexibility across the sector will be key to ensuring it is able to respond quickly to the challenges that Scotland will face in an increasingly competitive market.

**4.1 More Flexible admissions**
Credit transfer and recognising prior learning reduces the number of modules an individual needs to take to gain their qualification saving both the student and the sector time and money.

\(^3\) *A Funding Model to incentivise Part-Time Study*, Biggar Economics 2011
However, it is widely recognised that accrediting prior learning, particularly informal learning, is a time intensive activity and for that reason, most HEIs have neither the time nor the inclination to develop expertise in this area. Given the financial benefits of recognising prior learning to individuals, the sector as a whole and the state, through reducing the time it takes to complete a qualification, there is merit in exploring how the sector could be further supported in this area.

**The Open University in Scotland: accrediting prior informal learning**

The Open University has been at the forefront of developing innovative approaches to help individuals gain credit for their prior informal learning.

The Open University module, ‘Make your experience count’, is aimed at anyone in paid or voluntary work who wishes to build on their experience in the workplace in order to develop their career. The module has been supported in Scotland by organisations as diverse as IBM and Citizens Advice Scotland.

**4.2 Learner Journey: Encouraging early or advanced entry**

As highlighted above, the Open University in Scotland believes recognition of prior learning would be a key way to reduce the length of time taken to achieve an honours degree by offering advanced entry.

Although we recognise the potential for duplication in learning between the sixth year of study and the first year of university, the Open University’s credit transfer system already supports individuals gain advanced entry, so we do not have a strong view on whether other HEIs should allow advanced standing for pupils entering with those qualifications offered in sixth year. However, The Open University in Scotland recognises that economies of scale will prevent schools in some areas, particularly those in rural locations, from offering the full range of Advanced Highers and/or the Baccalaureates.

**The Open University in Scotland: supporting transitions from school to university**

The Open University’s Young Applicants in Schools Scheme (YASS) allows students (usually in their sixth year) to study HE modules alongside the curriculum offered by their school including subjects which are not on offer to them in their school.

YASS modules also help pupils develop the skills and confidence needed to make a smooth transition to university. These modules are counted towards an Open University qualification. To date, 787 S6 pupils across 76 schools in Scotland have studied with the OU through YASS.

YASS was developed in consultation with HMie and is now promoted by OPITO, the oil and gas training organisation to encourage more pupils to take up careers in the sector.

There is scope to consider how the YASS scheme (as outlined above) or a similar model could be expanded to support more schools offer a greater range of subject choices for their pupils and how other HEIs could be encouraged to credit these modules to allow more pupils participating in the scheme advanced entry.
The Open University in Scotland: providing flexible higher education

Flexibility is at the core of what The Open University does as illustrated by the following features of our model of provision:

i) A unique open admissions policy offers individuals the opportunity to study and progress to higher education, regardless of whether they have formal qualifications.

ii) The emphasis on credit transfer and recognition of prior learning makes The Open University a leader in the sector in this area.

iii) Multiple presentations offer opportunities throughout the year for students to commence study.

iv) Modular provision allows students to take time out and pick up their studies at a later date, and/or choose one or more modules to plug a gap in their learning, before going on to study at a different institution.

iv) The Open Degree allows students to tailor their degree through selecting individual modules from any OU undergraduate subjects.

v) Flexible delivery provided through a blend of media promotes interaction between OU students, while all students, including those living on islands, have the choice of studying and sitting examinations near their home.

4.3 Learner Journey: Greater flexibility in provision

As highlighted in Section 3.3, The Open University in Scotland strongly believes that a credit based funding system would encourage the kind of flexibility needed to support many of the ideas floated in the chapter on Learning, Teaching and Access, such as accelerated degrees, movement between HEIs, learner led demand and completing the learner journey at a slower pace.

The Open University in Scotland believes there is benefit in recognising different exit points. More recognition of exit points, such as the ordinary degree, could benefit individuals whose personal circumstances may require them to temporarily ‘withdraw’ before returning to study at a later date.

The Open University in Scotland supports the acknowledgement in the paper that ‘cross-disciplinary’ learning, teaching and research is important in bringing about advances in human knowledge and stimulating a more creative approach. The Open University supports ‘cross-disciplinary’ learning and teaching through offering the ‘Open Degree’ allowing students to select individual modules from any OU undergraduate subjects.

The Open University in Scotland works extensively with sponsoring employers and the majority of our students (71%) are in part-time or full-time employment, which makes us well placed to comment on the links between businesses and teaching, and on students in employment.

Flexibility, as noted in the consultation paper is a key requirement for businesses and employees when accessing higher education. Provision delivered on-line and
outwith the classroom, below full-time intensity, allows students to fit their studies around their personal and professional lives, which works for both sponsoring employers and employees.

Supporting the sector to recognise and accredit prior learning as suggested earlier, would also benefit businesses and employees as credit transfer allows advanced standing, and thus, reduces the time required out of the workplace.

While financial contributions from employers are valued, research undertaken by The Open University in Scotland suggests that students in employment would also value support from their employers in the form of study leave, mentoring and/or work related study networks. Moreover, evidence from the Open University’s skills utilisation projects suggests the need for the engagement of the employer, particularly the immediate line manager, if newly developing skills are to be fully utilised in the workplace. Greater consideration therefore needs to be given to how the Scottish Government could encourage other forms of support, beyond a financial contribution, from employers for those studying whilst in employment.

There is also significant demand for employers to provide additional employability and skills development opportunities for students, for example, through work shadowing, placements and internships. While The Open University in Scotland has led the way in establishing the Third Sector Internships Scotland scheme with Queen Margaret University and the Scottish Council for Voluntary Organisations (SCVO) to meet some of this demand, there is clearly more that could be done by the Scottish Government to work with employers to establish further employability opportunities.

**The Open University in Scotland: supporting workforce development**

As the leading provider of distance learning, over 75% of FTSE 100 companies and 50,000 organisations around the world sponsor staff on Open University courses.

The Open University in Scotland works with a range of sponsoring businesses, including transnational companies, local SMEs, large public sector employers and the third sector.

The Open University model transcends geographical boundaries enabling a reach that appeals to global companies headquartered in Scotland, as well as national organisations, that want consistent, quality learning for employees spread across different locations.

In addition, the economies of scale offered by The Open University in Scotland allows it to work with sector skills councils, professional bodies, and other employer organisations to develop work based learning modules and qualifications to meet the needs of Scotland’s workforce, such as the Scottish Social Work degree and various Diplomas in Higher Education, as well as progression routes for modern apprentices.

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The Open University in Scotland offers the following benefits to employers:
- Accreditation of in-house training to formally recognise learning that has taken place in the workplace;
- Integration of in-house training and development schemes into the OU qualification framework;
- Enhanced internal capacity, through collaborative teaching;
- Flexible learning provision that fits around an employee's personal and professional commitments.

4.4 Learner journey: HE in colleges and articulation
Although HNs were originally conceived of as vocational qualifications, they have become used more and more as transitional qualifications to degrees. Indeed, research by The Open University in Scotland suggests that students are increasingly seeing HNs as a ‘route to a degree’ with the proportion of our students declaring this as their ‘main motivation’ for studying for an HN rising from 6 per cent in 2005 to 21 percent in 2009.\(^5\)

The Open University in Scotland actively supports articulation as one part of the widening access agenda and also recognises that articulation routes play an important role in providing opportunities for retraining and upskilling. To date, The Open University in Scotland has formalised articulation and progression agreements with eighteen of Scotland’s colleges and is in discussion with several others to develop more agreements. Just under 900 students of all new OU undergraduates (about 17%) whose previous entry qualifications are known, have an HN or equivalent qualification.

Research suggests that for part-time students their transition to degree study is influenced by a range of factors including their personal circumstances and career changes.\(^6\) Over 70% of OU students who enter with an HN build on their college experience but switch the direction of their study, while the mean time for students between leaving college and coming to The Open University in Scotland is nine years. In addition, evidence suggests that many ‘hard to reach’ communities feel more comfortable with studying at less than full-time intensity until they have reached higher levels of confidence.

While The Open University in Scotland supports articulation, we believe the following assumptions need to be challenged for the policy to be fully effective: that students articulating from a college to an HEI wish to do so at full-time intensity; that students wish to move within the same subject area; that students do not wish to take time out between qualifications.

The Open University in Scotland also believes that articulation based solely on region denies the increased development of more mobile labour.

4.5 Teaching Excellence
The Open University agrees with Universities Scotland that it is neither desirable nor practical to judge the quality of teaching in terms of graduate employment opportunities. We believe that employability is too blunt an indicator of teaching

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\(^5\) From college to The Open University: tracking learner journeys Pete Cannell, Ronald Macintyre and Joan Thomson, The Open University in Scotland 2010.

\(^6\) Ibid
quality and that it is not clear how this indicator would be applied to part-time students, the vast majority of whom are already in work.

The Open University in Scotland believes that students who participate in the Student Satisfaction Survey remain better placed to assess the quality of their teaching than further crude indicators.

4.6 Widening Access
The Open University in Scotland welcomes the ongoing commitment from the Scottish Government to widen access to higher education.

Widening access is at the heart of what The Open University does: encouraging students into higher education and supporting them to progress to degree level courses with ourselves or at another HEI.

The evidence suggests that The Open University in Scotland has made a significant contribution to widening access to higher education. In the last ten years, the number of people living in low income households\(^7\) studying with The Open University Scotland has doubled. There are currently over 4,500 students in low household incomes studying at The Open University, accounting for over 30% of our undergraduates.

The Open University in Scotland also welcomes the acknowledgement that a multi-faceted approach is needed to increase participation rates from students from disadvantaged backgrounds and that the policy must look beyond applicants from school. The Open University in Scotland has sought to use and adapt OU resources and methodologies in order to address the needs and educational disadvantages of students from Scotland’s ‘hardest to reach’ communities, including refugees and asylum seekers. We are also unique in being able to provide HE for prisoners through our partnership with the Scottish Prison Service. There are presently 59 students in Scottish prisons registered with the OU for modules working towards a range of undergraduate qualifications.

**The Open University in Scotland: building partnerships, widening access**

Through its *Openings* programme, The Open University in Scotland offers a suite of credit bearing access modules, which are designed as a bridge into HE study. In 2009/10 over 1,500 students went on to an *Openings* programme.

Since 2005, The Open University in Scotland has been developing community-based partnerships with local organisations to establish sustainable paths into higher education and progression routes to further study. Using this model, students are recruited and jointly supported by the local OU project worker and the community partner, which allows the partner to develop a better understanding of the practicalities of accessing modules and funding.

In addition to providing the module materials, OU staff ensure that appropriate progression advice is available to students near the end of their module. To date, The Open University in Scotland has developed over fifty such partnerships across Scotland, with a range of agencies, including local authorities’ Community Learning Development Partnerships, unions and voluntary organisations. In 2010 over 300 students came to The Open University through these partnerships.

\(^7\) Households with an annual income below £16,000
The Open University in Scotland believes that in addition to the formal programmes that have been established across the sector to support wider access, recognition also needs to be given to the influence of other activities supported by the sector to informally encourage greater learning and civic engagement.

The Open University in Scotland: encouraging informal learning and cultural engagement

The Open University in Scotland a leading innovator in exploiting new media and the potential of social networking to build new bridges between informal and formal learning.

Many OU resources are available for educators and informal learners to download via iTunes or through our OpenLearn website.

- OpenLearn provides more than 6,000 hours of tuition across 12 topic areas;
- In June 2010, the OU became the first university in the world to reach 20 million global downloads on iTunes U.

In addition to exploiting new media, The Open University has a strong and unique partnership with the BBC, to bring the arts and sciences to a mass audience, through programmes such as Coast, A history of Scotland and Bang goes the Theory.

The Open University in Scotland also sponsors a number of cultural events such as the Edinburgh International Book Festival.

5. STUDENT SUPPORT

The Open University in Scotland warmly welcomes the objective in the consultation paper to create a system of student support, which is, “simple, equitable and fair”.

5.1 An equitable system

The Open University in Scotland strongly believes there should be parity between full-time students and part-time students with respect to student support to incentivise those students on low incomes whose personal circumstances mean they would prefer to study below full-time intensity.

Currently part-time students studying at HEIs are not eligible for the financial support that is available to full-time students in the form of bursaries or loans. In addition, part-time students are ineligible for specific types of funding available to full-time students such as the childcare grant.

As a result and as recognised in the recent report by the NUS Scotland, “many [part-time] students are struggling financially and feel that their studies are suffering as a result” 8.

The Open University in Scotland asks the Scottish Government to issue guidance to local authorities on part-time students’ eligibility for council tax rebates as some students on low incomes are currently deemed liable for council tax through local interpretation of the legislation which insists that students can only be classed as such if they are physically in attendance at a higher education institution.

In addition, The Open University in Scotland urges that the Scottish Government addresses the current anomaly, whereby students studying at full-time intensity with the OU do not have access to the same level of financial support as is available to full-time students studying elsewhere.

5.2 A simpler system
The Open University in Scotland welcomes the proposal to simplify the current student support system although we recognise the challenge in balancing simplicity with recognising the needs and circumstances of individual students.

5.3 Part-time
The questions on providing more support to part-time students towards their tuition fees are addressed in Section 3.

5.4 Disabled students
The Open University in Scotland believes the Disability Student Allowance (DSA) should continue to be allocated to individuals. Although institutions may theoretically be better placed to use the available funding to provide more efficient support for students with disabilities, this would not work for a non-campus based institutions. Also, moving the funding from individuals to institutions raises issues around equity, as there would be no guarantee that students with similar disabilities at different institutions would be provided with same equipment and/or levels of support. Moreover, SAAS who administers DSA acts as a shared service across HEIs which provides economies of scale in relation to the administration of the scheme.

The Open University in Scotland: Flexible provision for students with disabilities
A high proportion of student with disabilities study at The Open University because of the flexibility of provision and delivery that we provide.

There are currently over 1,000 disabled students, studying with The Open University in Scotland, who account for 7% of all students.

6. RESEARCH AND KNOWLEDGE EXCHANGE
The Open University in Scotland welcomes the debate in the consultation on the role of research and knowledge exchange within the consultation paper.

6.1 Concentrate research funding on research excellence
The Open University in Scotland would not support a move to further concentrate research funding, but would be supportive of further moves to encourage more research pooling and consortia. Targeting funding towards research-intense HEIs may mean that knowledge exchange resources could follow the same route, which would overlook the wider role of knowledge exchange in terms of cultural engagement and input into policy formation, which are not necessarily the end product of research impact.

6.2 Concentrate research funding on Scottish Government priorities
The Open University in Scotland would support funding for Scottish Government priorities from sources other than SFC streams, for example, an investment stream jointly funded by government and industry. Building up a research base within an HEI
can take several years, and as such does not lend itself to the changes in priority that might come with changes of Government.

6.3 Maximise funding from Europe
The Open University in Scotland would strongly welcome more support from the Scottish Funding Council and the Scottish Government to help build up the research capacity and expertise needed, in order to enable Scottish HEIs to participate in EU consortia. Obtaining other research funding is usually necessary before researchers can participate in EU consortia which may hamper the ability of some HEIs to secure EU funding in the first instance.

7. INTERNATIONAL CONTRIBUTION

7.1 Increase universities’ income from overseas activities
In addition to attracting international students from overseas to Scottish HEIs, there is scope to support international students already studying at HN level at Scottish colleges progress to degree qualifications at HEIs.

While the focus of the consultation paper is on increasing the ‘financial’ contribution of international activities, it is also worth considering the role that the HE sector plays in promoting Scotland and its culture to a global audience. For example, through OpenLearn, anyone, anywhere in the world can download OU learning resources, including those with highly specific Scottish content.

The Open University in Scotland: Supporting women into teaching in Malawi

The Open University’s award-winning Teacher Education in Sub Saharan African (TESSA) programme is a research and development initiative creating open educational resources and module design guidance for teachers and teacher educators working across nine countries in Sub Saharan Africa.

The Scottish Government recently awarded £400,000 to The Open University in Scotland building on the TESSA programme to develop a Saltire Scholarship scheme which will provide local school-based access to a teaching career for women in rural areas of Malawi. The funding will allow The Open University in Scotland to play a significant role in supporting the Scottish Government’s International Development Policy and its particular commitment to Malawi.

8. SHAPE AND STRUCTURE
The Open University in Scotland welcomes the acknowledgement in the consultation paper of the strong track record that Scottish HEIs have in working collaboratively to ensure the best possible learner experience. We recognise the need to examine the current institutional landscape as well as the structure and function of the bodies who support the sector to ensure such high levels of quality are maintained.

8.1 Map of provision
The Open University in Scotland supports a map of provision which will ensure that the highest quality of HE is offered to students and highlights the choices available for both modules and modes of study. A map of provision that looks at what higher education courses are currently offered by both colleges and HEIs would also enable a more strategic sense of what is available to support greater articulation.
A key advantage of The Open University - the economies of scale which allow it to draw on a wide range of provision - combined with its ability to deliver higher education in any community, offers the potential for other institutions to draw on its modules to complement and boost what is available locally.

Access to higher education locally is important as it can facilitate retention of skills and maintain the demography of more remote and isolated communities.

8.2 Improving information, advice and guidance
The Open University in Scotland is an active participant in QAA Scotland’s enhancement themes. We believe that the diversity of the HE sector is a great strength of the Scottish sector and should be maintained and developed. While there is always scope to provide more information, The Open University in Scotland believes that public information on institutions should be student centred. The information currently available through the National Student Survey by students (who are best placed to assess the quality of their teaching) should be supported by high quality information, guidance and advice systems located in institutions.

As the consultation paper highlights, information, guidance and advice are essential to support students successfully progress and complete their studies, especially students from non-traditional backgrounds. Advice and guidance is also important for people who have withdrawn before completing their studies, who may be interested in returning to education.

The Open University: Supporting students to complete

In recognition of the particular expertise that The Open University has in this area, the Higher Education Funding Council for England (HEFCE) has funded the OU to lead a project in partnership with UCAS to support students who have withdrawn from university before completing their studies and who are interested in returning to education or exploring other positive options.

Following a successful pilot, Back on Course is now working with former students from HEIs across England to offer impartial advice and guidance to support students complete their HE studies or move on to other possibilities.

The Open University believes that serious consideration should be given to whether a similar service in Scotland as outlined above would benefit students who have withdrawn, and the sector as a whole.

8.3 The tripartite relationship
The Open University in Scotland supports the current tripartite relationship between universities, the Scottish Government and the Scottish Funding Council.

As highlighted in Section 3, we believe that there is scope and demand for the Scottish Funding Council to use its funding more creatively to move to a credit based funding model which would incentivise the flexibility called for in the consultation paper. In addition, we believe that greater consideration should be given to streamlining the different funding streams administered by different agencies, particularly those streams aimed at incentivising part-time provision.
The Open University supports maintaining a single funding council for further and higher education as this structure supports the lifelong learning agenda and enables effective use of the Scottish Credit and Qualifications Framework.

**Further information**

The Open University in Scotland is happy to expand or clarify any of the points in its response.

For further information, please contact, Una Bartley, Policy and Public Affairs Manager: u.bartley@open.ac.uk or 0131 549 7195.