The Open University in Wales response to HEFCW Consultation
Developing the HEFCW Part-time Higher Education Action Plan 2012-13 to 2015-16

About The Open University in Wales

1. The Open University was established in 1969, with its first students enrolling in 1971. It is a world-leader in providing innovative and flexible distance learning opportunities at higher education (HE) level. It is open to people, places, methods and ideas. It promotes educational opportunity and social justice by providing high-quality university education to all who wish to realise their ambitions and fulfil their potential.

2. Nearly nine thousand students from virtually every community in Wales are currently studying with The Open University, enrolled on over eleven thousand modules. We are the nation’s leading provider of part-time higher education. More than three out of four Open University students are in employment while they study and with an open admissions policy, no qualifications are necessary to study at degree level - over a third of our undergraduate students in Wales join us without standard university entry level qualifications.

3. In 2012, for the eighth successive year, The Open University was top in Wales for ‘overall student satisfaction’ in the National Student Survey, and as a world leader in education technology, our vast ‘open content’ portfolio includes free study units on OpenLearn (including many Wales-related materials), substantial content on YouTube and on iTunesU, the latter having recorded nearly 60 million downloads.

Introduction

4. The Open University welcomes this opportunity to contribute to the development of HEFCW’s Part-time Higher Education Action Plan 2012-13 to 2015-16. In our response we have considered the questions suggested in the circular and the draft part-time action plan itself (as set out in annexe A to the circular). In this introductory section we also make what we consider to be important overarching points and we ask that these are taken into account by HEFCW as well as our responses to the specific questions posed in the consultation document.

5. As Wales’ largest provider of part-time higher education this document is of particular relevance and importance to us and to our current and potential students. We are committed to playing a wide-ranging role in meeting the needs of learners, employers, communities and citizens across Wales. Based on our mission and ethos of openness, we work to support social justice and a buoyant economy, opening up higher education to all those who might benefit from it. We value our strong working relationship with HEFCW which supports us in meeting our mission.

6. As was recognised in HEFCW’s ‘Future Structure of Universities in Wales’ report, The Open University is “uniquely positioned” within the structure of higher education in Wales. The report also recognised both our “major contribution” to widening access in Wales and the “important contribution” we can continue to make to curriculum development and employer engagement. It is within this context that we welcome the commitment from both the Welsh Government and HEFCW to the essential role that part-time provision and providers play in

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1 HEFCW ‘Future Structure of Universities in Wales’, June 2011
widening access, enhancing skills and economic development, and in bringing the wider societal and cultural benefits of higher education to individuals and communities (we do however have concerns that the latter core purpose of HE is insufficiently fore-grounded in the draft Action Plan). This is reflected in the approach evident through For our Future; the consultation and subsequent work on part-time funding and student finance; the Education Minister’s remit letter to HEFCW (21 March 2013); the HEFCW corporate strategy and now this consultation document.

7. We believe that action plan does not represent a sufficiently coherent and strategic approach to the longer term future of part-time higher education. We recognise the important challenges set out in HEFCW’s 2013/14 remit letter in relation to part-time (paragraph 8 of the action plan consultation document) and are keen to work - with others where this adds value - towards meeting these challenges. As the action plan currently stands we do not see a strong enough linkage across demographic, social and economic change in Wales, learner and employer demand now and into the future, and the specific challenges in the remit letter and the actions identified to meet them. We would welcome further revision of the action plan to align it further with the expectations around “innovative approaches” set out in the remit letter, for example. More broadly, there is an absence of context in terms of the purposes of part-time provision that themselves ought to flow from broader societal change and need. It may be that these will be addressed within the Welsh Government’s new policy statement on HE – in which case there may be a need to adjust the action plan in the near future. We note also the reference in the covering consultation document (Circular W13/12E) to ‘the UK environmental factors impacting on part-time provision and the current downward trend in both part-time provision and demands from students and employers’. We would wish to see an explanation of HEFCW’s understanding of what these factors are. The OU in Wales has experienced no decline in demand from students or employers in Wales, for example. We would point out also that student demand may be a result of policy changes that depress demand and/or provide disincentives for institutions, rather than always being a consequence of broader economic changes. Nor can policy changes elsewhere in the UK necessarily be ‘read across’ to Wales in a way that can account for decline in part-time provision, given the differing fees and funding regimes that apply.

8. As well as the new policy statement, part-time provision - and, inevitably, a number of the activities and ambitions set out in both the HEFCW corporate strategy and the part-time action plan - will be affected by changes to the funding and support regime for part-time students, initial details of which have only just been set out by Welsh Government. Without further details about the eligibility criteria for the new loans for part-time students or time to consider the implications of this new system we believe that it is necessary to allow for flexibility in devising the action plan and in responding to it. Much of the plan, including the ability to meet the overall measurable outcome, may be affected by the new loans regime and as such it will make sense to re-visit the action plan once the full details and implications of the new fees and funding arrangements become clear. This will best be achieved in partnership with institutions and learners.

9. We also have concerns about the overall measurable outcome itself. We understand that this has now been agreed by Welsh Government and forms part of the final HEFCW Corporate Strategy for 2013-14 – 2014-15 but we do not feel that it makes sense to set a target based upon comparable figures from the UK. It is unclear as to whether the intention is to compare Wales’ part-time student numbers with those in the component parts of the UK or with a UK average. Either way, we do not see the rationale for setting a relative target in this way in an area that - unlike full-time provision – does not comprise a ‘cross-border’ student market and in which the fees and funding regimes are very different between Wales and England. This appears to set an unfortunate precedent by which the target will move as a result of fees and funding decisions taken by a different government or governments.

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2 Student Finance Wales Information Notice (03/2013), issued on 3 June 2013
There is also the potential for confusion as the target states that the “percentage change in the number of part-time students……to be equal to or greater than the comparable figure for the UK.” The most recent figures from England show a c.40% drop in the number of part-time students since 2010\(^3\). This raises a number of concerns: Firstly it does not seem ambitious enough to simply try to avoid the large decline in part time numbers in England, given the fact that part-time is a priority for Welsh Government and HEFCW and the support regime for students is different to that across the UK. Secondly the wording in itself is confusing and could be interpreted to indicate that if England sees a 40% decrease in part-time students Wales is aiming for a similar or greater decrease (to make the percentage change equal to or greater than). We recommend revisiting this outcome, perhaps in light of a new fees and funding regime, to make it clearer and more ambitious.

10. There is a commitment within the plan to assess the part-time offer at HEIs where provision is buoyant and work with those who can do more to increase provision. As Wales’ largest provider of part-time higher education the Open University is keen to contribute to this commitment and we believe that we can do more to increase provision on behalf of the sector as a whole. We would welcome a discussion with HEFCW at the earliest opportunity about how we can take this forward and how any barriers to potential increases in our student numbers could be overcome.

11. However, a significant omission from the action plan is the forthcoming removal of Widening Access and Innovation & Engagement Strategy funding. Given that the core institutional Learning & Teaching grant will remain and that the Minister’s remit letter explicitly states that he expects there to be no significant increase in fees for part-time as a consequence, the removal of the strategy funding for part-time provision appears to be a ‘hidden’ reduction in funding that will make it harder for HEIs to maintain or increase part-time numbers. Whilst we understand that the high fee regime for full-time provision justifies the loss of strategy funding for that part of the sector, there is no equivalent increase in income for part-time and the pro rata per capita investment from the public purse is now far from equivalent given the large fee grant system in place for full-time. We are mindful that for 2013-2014 HEFCW has listened to our concerns on this in agreeing to ensure broad equivalence in HEFCW support compared to 2012-2013, but a steep decline in funding beyond 2013-2014 due to the loss of strategy funding will have a detrimental affect on the OU as the largest provider and one that has shown year on year growth in undergraduate recruitment in recent years. We note that the Minister’s remit letter (paragraph 26) states that HEFCW should seek to continue to provide funding for the part-time sector at ‘broadly current levels in real terms’. We would be glad of the opportunity to discuss with the funding council how this can be achieved beyond 2013-2014 in the context of the removal of strategy funding.

12. In section 1.i of the action plan, the term ‘subsidise’ is used to describe HEFCW support for part-time HE in 2013-2014. We would urge that this is altered to ‘support’ or ‘invest in’. The term ‘subsidise’ can be read as underwriting provision that is weak, in contrast to full-time provision. However, full-time provision is heavily supported by the public purse in the form of low interest fee loans and, in particular, the large fee grant (for which there is no equivalent for part-time). We believe that it is not appropriate to single out part-time provision so as to imply that it alone is in need of public subsidy.

13. We would welcome clarity around the date of the action plan itself and the time period to which it relates. The front cover states that it is an action plan for 2012-13 – 2015-16 but inside the document states “this circular sets out for consultation HEFCW’s draft Part-time Higher Education Action Plan 2013-14 – 2015-16.” There are also some dates and actions in the document which relate to historical activity and actions / information from 2012-13. Clarity over the exact dates and starting point for this action plan would be welcomed.

Response to Consultation Questions

To what extent will the Action Plan contribute to Welsh Government part-time study-related expectations?

14. As stated above, in the absence of more detail about the new fees and funding regime and an assessment of its implications it is difficult to assess how both the Open University in Wales as an institution and HEFCW will be able to meet Welsh Government part-time study related expectations. To market the part-time offer most effectively for students further detail of eligibility criteria for loans and designated courses will be required. Furthermore, as stated above, the implications of the removal of strategy funding and the requirement for there to be no significant increase in fees needs to explored, understood and explained by HEFCW. The action plan does not do this.

15. We would be concerned about certain proposed limited eligibility criteria for part-time learners in accessing loans. For example, by not including those who are studying for a qualification that is equivalent to, or lower than the one they already have (ELQ students) within the eligibility criteria, a clear disincentive has been created for a key part of the part-time market, i.e. those with higher level qualifications that need to upgrade their skills levels, return to the labour market or change career as part of developing a high-skills economy. The introduction of this policy in England, along with higher fees, is a reason for the decline in part-time student numbers.

16. We recommend that some flexibility could be brought into the new part-time student support and funding system to support HEFCW’s objectives in this area. For example, the intensity of study for workplace learners may not meet the eligibility threshold, or they may not be students undertaking a first undergraduate degree. We would be keen to see this provision, perhaps focused on priority subjects, recognised in a new fees and funding regime (potentially through premia funding), as it is not within the remit of ‘student fee’ led funding, as proposed by the Welsh Government.

17. We also particularly welcome consideration of how best to incentivise part-time study for employer-led courses and of alternative models of delivery (for example the OU Social Work Degree is operated in partnership with employers across Wales, who contribute to management, development, and delivery of the programme). Many of our students are sponsored by their employer or through the Wales Union Learning Fund (WULF) and forthcoming changes to the fee regime could therefore impact on a large proportion of our students and their employers. It will be important to ensure that the eligibility criteria for the new loans allow for flexibility and we would welcome further discussion on this.

18. Whilst there has been a sectoral decline overall in part-time undergraduate recruitment it is the case that the Open University in Wales continues to increase student numbers year on year, supporting the Welsh Government strategic objective to grow part-time students. However, this poses challenges for the University, with c30% of our students attracting no teaching grant funding. We would be keen, and able, to contribute further towards increasing the numbers of part-time students in line with Welsh Government priorities, meeting the sector target for part-time students, but it is difficult for us to continue to absorb potential increases in our numbers. We would therefore welcome a dialogue as to how HEFCW could assist us in supporting the strategic priority further, including where other HEIs cannot meet demand or may be de-committing from part-time provision.

19. There is an expectation within the remit letter and the action plan to consider “alternative models for the provision of part-time study e.g. the FE sector providing more HE courses in collaboration with employers and the HE sector.” In this regard we would welcome a shift in focus to assist the FE and HE sectors to work together to progress students from FE to HE,
rather than concentrate solely on collaborative delivery. Part-time higher education offers a range of opportunities for students to continue their studies after progressing through FE and we would like to see more of a focus on institutions working together to achieve this.

20. In order to meet Welsh Government expectations in relation to part-time in the longer term there is a need for clarity over where part-time sits in relation to full-time and a consideration of long-term future of fees and funding regimes for both.

**To what extent will the identified actions support the sector to improve part-time higher education opportunities and meet the Action Plan’s measurable outcome?**

21. As stated above (see paragraph 9) we have concerns about the measurable target and believe that it needs to be revisited.

22. Subject to our detailed points set out in this response, we support the actions identified within the plan and are keen to work with HEFCW and other institutions to ensure their implementation. We recognise that these actions contribute to a range of other priorities and targets, but as a result they do not seem to articulate a co-ordinated approach to the support for, and development of, part-time study opportunities. There is a need to ensure that these are not seen as a set of separate actions but as a coherent approach to part-time higher education, this is perhaps lacking in the draft action plan as it is currently written. Some of the actions set out are examples of the routine business of the Funding Council rather than constituting a strategic and co-ordinated approach for the sector.

**Are there additional innovative approaches that HEFCW should consider and, if so, how might we implement and monitor them?**

23. Previously policy decisions have been made primarily in respect of full-time higher education and then applied to part-time as a secondary consideration. In light of the Welsh Government’s clear commitment to part-time, we would welcome the opportunity to review all future options for full and part time HE together in dialogue with the sector.

24. The Open University is at the forefront of developing and promoting Open Educational Resources and would welcome the opportunity to discuss further how these can be developed and supported in Wales to ensure innovative approaches to the delivery of higher education.

25. We would welcome further discussion about the unique role that the Open University could play in adopting innovative approaches in order to address the issues identified in paragraph 8 of the consultation document.

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

26. Decisions about the eligibility criteria for loans for part-time study will have an impact on, and possibly unintended consequences for, individuals who are currently under-represented in higher education, this will need to be taken into consideration as further details of the criteria are decided. (See also paragraphs 15 and 16).

27. The run-down and planned removal of Widening Access and Innovation & Engagement Strategy funding is not covered in the action plan. The implications of the removal of this funding need to be explored understood and explained.

**Are there any equality and diversity, sustainability, or Welsh medium issues that should be considered further in developing the draft Action Plan?**
28. In terms of sustainability we would like to see a wider discussion about a long term vision for the future of part-time higher education to ensure that any future policies create a stable basis for the delivery and growth of this part of the sector.


29. The action plan itself is a little confusing as it is not clear how some of the actions relate to the priorities that sit above them. For example, actions 3 – 6 seem to sit more naturally under the ‘Policy Development and Implementation’ priority. We would recommend reviewing this to create a more coherent document where the priorities, actions and targets are more closely and logically aligned. Below we set out our comments in relation to the specific points contained within the draft action plan.

30. Number 1: Implement the actions set out in the Welsh Government’s Written Statement on HE part-time undergraduate support (March 2013) and remit letter from 2013-14.

This is fundamental to the future of part-time higher education. HEFCW should commit to revisiting, and possibly revising, the action plan once further details about the likely impact of the new funding and support regime are clear. HEFCW also needs to ensure consultation with the part-time sector and students on the implementation of the new proposals for part-time support. Note also our point made earlier regarding the use of the term ‘subsidise’ (see paragraph 12). HEFCW also needs to explore and explain how the remit letter’s commitment to no significant increase in part-time fees is to be reconciled with the removal of strategy funding.

31. Number 2: Implement Welsh Government’s policy expectations in relation to how technological developments may provide a platform to increase participation in part-time HE.

The Director of the OU in Wales is a member of the Online Digital Working Group and we look forward to continuing to play a major part in the development of Open Educational Resources (OER) in Wales. Our substantial investment in OER provides innovative and accessible pathways for non-traditional learners into more formal study, as well as opening up HE in a more general sense. We are a world leader in OER and this is a clear example of how learners in Wales benefit from the UK and global reach and scale of The OU. The recent establishment of ‘Futurelearn’, with Cardiff University as a partner, will also benefit learners in Wales. In this area, it should be recognised that the OU is a world leader and developments in this area will not be helped by any approach that seeks to ‘level down’.

32. Number 3: Consult on and begin implementation of the HEFCW Part-time Study Action Plan, taking account of the Welsh Government response to HEFCW report.

We welcome the commitment, under the ‘outputs’ section of this action, to revise the action plan following this consultation exercise. We believe that it will be important and timely to do this in light of the recent announcement on part-time loans from 2014-15 and the new Welsh Government higher education policy statement.

33. Number 4: Continue to analyse sector progress against our Corporate Strategy 2010-11 – 2012-13 part-time measure.

It is not clear why this target says “continue” to analyse if the date used only goes up to 2012/13. (See also paragraph 13 regarding ambiguity regarding the dates used in this document). Clarity regarding what this analysis will be used for would be welcome. We believe that this information needs to be used to inform action number 5.
34. Number 5: Implement the HEFCW Corporate Strategy part-time measure for 2013/14 to 2015-16 and assess sector progress.

As stated above we do not believe that the outcome measure for part-time within the corporate strategy is appropriate and we would recommend that it should be revised (see paragraph 9).

35. Number 6: Progress the HEFCW Skills and Employability Agreement and monitor sector progress

This appears to be the normal business of the Funding Council.

36. Number 7: Consider, and contribute as appropriate to the UCAS national part-time applications portal developments.

The OU may be able to offer expert advice based on its already existing relationship with UCAS.

37. Number 8: Fund the Cadarn learning portal.

The OU in Wales is a partner in this development. As well as our own input we will be looking to HEFCW to ensure that it treats full and part-time on an equivalent basis.

38. Number 9: Provide guidance and technical support to institutions to ensure delivery of new bilingual Key Information Sets.

We welcome HEFCW’s guidance and support on this.

39. Number 10: Develop arrangements to ensure prospective and current students as well as graduates have access to high quality information and guidance services.

This action does not offer any specific detail or information on how it will be achieved beyond the relationship with Careers Wales. We would like to know what the role of institutions will be within this and what dialogue has, or will, be taking place with them.

40. Number 11: Implement HEFCW’s funding intentions for part-time study in Wales.

The issue of the removal of strategy funding will need to be addressed (see paragraph 11).

41. Number 12: Clarify and promote the part-time fees and support regime for Wales and its differences from other parts of the UK.

This is absolutely essential to the action plan and the future of part-time higher education. We would like to see a more explicit output here such as the commitment to a national campaign promoting part-time higher education opportunities and the funding available across Wales. Lessons need to be learned from the experience in England where the lack of understanding around the loans system has been cited as one of the reasons for the decrease in part-time student numbers. As the only University operating in all four jurisdictions of the UK the OU is uniquely positioned to understand the opportunities and the challenges of the diverging funding regimes. The OU’s experience of working with the Student Loan Company will be of benefit to HEFCW and the sector more widely.

42. Number 13: Assess the effects of the part-time premium.

4 Ibid.
We would be keen to know what information has been gathered so far on the effects of the part-time premium and how it has been used to influence policy development. Further information about how the premium has/is/will be assessed would be welcome as would detail of what will be done with this information.

If the aim is to incentivise postgraduate and bite size provision (as set out in paragraph 8 of the consultation document) then it is important to bear in mind that these types of provision may not attract the part-time premium.

43. **Number 14: Implement the HEFCW Foundation Degree policy; and our Widening Access Strategic Approach and Plan.**

We wish to see a separation out of the Widening Access and Foundation Degree actions into two distinct actions with outputs and targets. In the area of widening access we wish to see an explicit reference to an ‘all-age approach’ and believe also that this action should take account of the work that WISERD are currently undertaking in the area of Widening Access.

44. **Number 15: Support the development of collaborative higher level apprenticeships.**

We look forward to further discussion about this action and hope to be given the opportunity to feed into this activity at an early stage.

45. **Number 16: Review progression to part-time postgraduate studies, including access to the professions by widening access students.**

Whilst the identified HEFCW action in this area is welcome we would like to see more done to directly incentivise part-time postgraduate study and would welcome further discussion on this.

46. **Number 17: Implement the HE related recommendations of the Welsh Government’s HE in FE review.**

See paragraph 19. It is important to consider working together on progression from FE to HE not just collaboration in terms of delivery of HE within FE.

47. **Number 18: Encourage the development of online resources which support part-time study**

See paragraph 31. In order to maximise the benefit of OER it is also important that, resources are put into dissemination, information and training for the sector, students and potential students. As a world leader in OER we would welcome the inclusion of the Open University in the list of partners for this action. The OU brings huge value in this area to learners in Wales that derive from its innovation, scale and reach. We would wish HEFCW to recognise our world-leading status in OER and that different HEIs will move at different speeds in this area.

48. **Number 19: Identify opportunities for partnerships and collaborations to maximise part-time and flexible provision regionally.**

As the only institution working across all of the regions we are keen to contribute to this agenda and would welcome support from HEFCW in identifying partnerships and opportunities for collaboration. Given the distinct nature of the OU’s provision and delivery, it is important that partnerships add value and lead to meaningful outcomes for learners.

49. **Number 20: Extend and support FE to HE progression opportunities.**
We welcome this, see paragraphs 19 and 46.

50. Number 21: Oversee the delivery of the Universities Heads of the Valleys Institute (UHOVI) programme and transition to the second phase developments.

The OU would wish to make a greater contribution in this area. We believe that our distinct mode of delivery would add to the UHOVI offer, rather than compete with existing providers, and thus be to the benefit to learners, employers and residents of the heads of the valleys region.


We are pleased to see that the event that we recently hosted in partnership with HEA and NUS Wales has been recognised in the action plan. We were also pleased to see HEFCW officials present at the event (although in the interest of transparency we state here that we did not receive any additional funding from HEFCW for the event - perhaps implied by the term ‘support’). We look forward to engaging in discussions with HEFCW about ways in which this work can be supported in future in order to take forward the issues that came out of the event.

52. Number 23: Analyse National Student Survey (NSS) part-time student experience trends.

We welcome HEFCW’s commitment to the National Student Survey as a measure for student experience. As the only University in Wales with a three year rolling average score above 90% for overall satisfaction, our world-leading distance higher education offer has the student experience at its heart.

53. Number 24: Assess the part-time offer at HEIs where provision is buoyant working with those HEIs who can do more to increase provision.

As Wales’ largest provider of part-time higher education the Open University is keen to explore with the funding council how it can build upon this growth in order to create more opportunities for learners. Where other HEIs wish to de-prioritise or de-commit from part-time, we would be keen to explore how we can meet need and demand.

54. Number 25: Support the increase in availability and accessibility of Welsh medium online and other flexible learning.

We welcome this target and we are committed to supporting the Coleg Cymraeg Cenedlaethol to develop Welsh medium flexible provision by deploying the unique attributes and strengths of the OU. This will focus principally on the development of Welsh medium OER.

55. Number 26: Ensure widening access provision and regional Reaching Wider Partnerships contribute to promoting part-time undergraduate and post-graduate part-time progression.

We understand and support the commitment to the regional dimension of widening access. As the only HEI that is a member of all three HEFCW regional strategies we already bring the benefits of our scale and our employer-focused offer in particular, to collaborations within a regional and pan-Wales framework. We believe that it may not be sufficient to just monitor this activity and suggest that in order to achieve outcomes it could be made a condition of the Reaching Wider partnerships grant that partnerships undertake activities linking to the promotion of part-time HE.

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56. Number 27: Continue to monitor UK and Welsh trends in part-time provision.

We see this as part of the normal and proper business of the funding council.

57. Number 28: Commission further research and/or evaluations of part-time provision to ensure delivery of Welsh Government expectations.

We welcome this action. In collaboration with NUS Wales, the OU in Wales is currently planning a piece of research on the part-time sector in Wales and would welcome a discussion with HEFCW about how this research could be supported to inform the delivery of Welsh Government and funding council expectations.

58. Number 29: Monitor progress on delivering the identified actions above.

Again, we see this as part of the normal and proper business of the funding council.

59. Number 30: Review the Action plan in light of Welsh Government policy developments with implications for part-time HE, including fees and support.

We believe that this action is essential and will be necessary following the recent announcement on part-time loans and the new HE policy statement. It should be listed under the same priority heading as action 3.

Further additional comments

60. Whilst supportive of many of the elements of the draft action plan, and keen to work with partners towards their implementation, we believe that the action plan may need to be revisited once further information is available on the implications of the new funding regime for part-time students and that there needs to be an explicit consideration of the implications of the removal of the strategy funding. Taken together these are such fundamental elements of the future support for and delivery of part-time higher education in Wales that we do not believe that a meaningful or ambitious action plan can be developed or implemented without their consideration. We would also wish to see consideration of the role that part-time HE plays in the wider civic and cultural roles of higher education and in community development. Whilst these can be difficult to measure, they are widely acknowledged key purposes of HE.

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Contact: Michelle Matheron  Tel: 029 2026 2708  Email: Michelle.Matheron@open.ac.uk