Consultation Response - HEFCW’s draft Higher Education Strategy to 2026

About The Open University in Wales

1. The Open University (OU) 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. Over 7,000 students across Wales are currently studying with The Open University, enrolled on around 10,000 modules. There are OU students in every National Assembly for Wales constituency and we are the nation's leading provider of undergraduate part-time higher education. Almost 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. As a world leader in educational technology, our vast ‘open content’ portfolio includes free study units on the free online learning platform OpenLearn (including many Wales-related materials and our Welsh Language platform OpenLearn Cymru) and substantial content on YouTube and on iTunes U where we have recorded over 70 million downloads.

Response to consultation questions

4. The Open University in Wales is pleased to respond to HEFCW’s draft higher education strategy to 2026. We note that it is a draft strategy to be presented to the Government for further work and possible amendment. Following the publication of the final recommendations of the Diamond Review, significant changes to the HE system in England, and the recommendations of the Hazelkorn review, this is a very significant time for higher education in Wales. The wider political context, including the UK’s withdrawal from the European Union, will also have a major impact on the future of HEIs and for students in Wales and beyond.

5. The OU in Wales recognises the need to ensure that institutions are supported to deliver their priorities and those of the Welsh Government, at the same time as retaining institutional autonomy and operating as part of the UK and global HE system. A ten-year higher education strategy will necessarily be high level, forward-looking, and will seek to anticipate future needs and trends but it must also offer a framework for institutions and students to succeed. We recognise that the strategy focusses on the ‘what’ rather than the ‘how’ and we look forward to further engagement with HEFCW and others to consider our role in the delivery of the strategy once it has been agreed. Below we offer responses to the consultation questions and some general observations which we hope will be helpful in the development of the final strategy document and its implementation.

Have any key areas of potential demand been missed (please provide evidence to back up your suggestion)?
6. The development of a ten year strategy by means of the Well-being of Future Generations Act (FGA) as a framework has many advantages. But it is also unnecessarily constraining. The FGA is applicable to HEFCW but not to individual universities. This is for good reason as the principle of institutional autonomy is an important one. As the Diamond report contends, higher education should be seen as a 'public good', but the way that it is delivered is via autonomous bodies with charitable purposes that are not part of the public sector narrowly defined. This is an asset of the Welsh HE system, rather than any kind of impediment, and the maintenance of this vital aspect of Welsh higher education should be foregrounded in the strategy.

7. The FGA has many merits, including the various indicators cited by HEFCW at the end of the draft strategy document. However, education as a key component in securing the well-being of future generations – and especially higher education – is insufficiently foregrounded within the Act. For example, indicator 35 refers to the percentage of people who attend or participate in arts and cultural activities. However, there is no indicator for the percentage of people who participate in lifelong learning opportunities or re-training for work during their working life - although we note that this form of provision is referenced in the draft strategy (pages 20 & 21). At a more basic level the Act does not specify a desired level for the proportion of graduates within the Wales of the future.

8. Similarly, with the overarching focus of the FGA being on the environment, the role of HE in economic development through the development of higher level skills, and knowledge transfer activity, is underplayed. This needs to be placed front and centre of any strategy for HE.

9. Research activity, including ‘blue sky’ research is insufficiently explored. Its coverage on pages 7 & 8 is overly short and limited to its possible role within the economy and links with industry. There are other forms of impact, some of which will apply beyond the borders of Wales.

10. The draft strategy reads as if HE in Wales is insulated from UK-wide and global developments. In particular, the close integration of HE in Wales with the sector in England needs to be addressed. Related to this, any strategy of this kind should refer to threats and risks – not least from competition, whether that is from other HEIs in the UK (and globally) or threats from the growth in private providers.

11. The obverse of this is that collaboration with HEIs across the UK and internationally presents opportunity, and this needs to be referenced more strongly in the draft strategy.

12. There are also growing trends in HE that are either not referred to or not fleshed out in the daft strategy. An example is the role of the internet and social media as both disruptor and enabler. They pose challenges to pre-existing modes of delivery and – in a wider context – to how knowledge is both produced and disseminated in modern societies and globally. It was surprising to see no mention in the draft strategy of the growth of the Open Educational Resources and the possible future role of Massive Open Online Courses (MOOCs).

13. These and other developments pose important questions to existing sets of qualifications. At sub-degree level the blurring of boundaries between HE and FE is increasing with the development of high level apprenticeships. But in a wider sense, demand from employers and professional bodies, and changes to ways in
which knowledge is disseminated and consumed may pose changes to the notion of ‘graduateness’.

14. These are longer term trends that ought to be covered in a ten year strategy, along with reference to some of the literature and evidence on longer term trends for HE. The references contained in the draft strategy, in that they chiefly cite Welsh Government or Wales-related documents, have the effect of pushing the strategy to a position that might be seen as insular for a sector and set of activities that are international in scope.

15. The Open University in Wales is pleased to see that the draft strategy maintains and enhances the notion of the all-age delivery of higher education. We welcome the fact that flexible learning is mentioned at various points throughout the strategy and is not considered as a separate strand of activity. This mainstreaming of flexible and diverse modes of provision is a very positive step towards a sustainable, fit-for-purpose HE system for the next ten years. We would welcome a more specific and greater emphasis on re-skilling adults through this flexible provision, making the important link between the needs of Wales’ economy and what HE can and should deliver. As outlined in the draft strategy, Wales’ economic needs cannot be met without prioritising the development of new skills but this must also involve the upskilling and reskilling of the existing workforce. Flexible approaches such as part-time HE, short courses, work-based learning and the ability to transfer credit between providers are essential to this agenda.

16. We also believe that there should be greater recognition in the strategy that opening up higher education via flexible options is about creating a ‘prosperous Wales’ as well as an ‘equal Wales.’ Areas, such as gender, that have previously been primarily considered as equalities issues need to be considered as part of our economic strategy.

17. The strategy looks ahead ten years and considers population changes, skills needs, employment demands and technological advances in respect of what HE will need to deliver. The Open University in Wales would like to see more of a focus in the strategy on how HE might deliver over the next decade. The strategy should analyse and prepare institutions for how HE may need to be delivered in more innovative and flexible ways as technology continues to offer new opportunities and new competition. The students of 2026 will demand more in terms of how their courses are delivered and how accessible and available information is to them. There is significant potential here, especially in a small and nimble nation like Wales, to try new things and develop our pedagogical approach using digital technology. The OU is a global leader in this area and would be keen to help to support this work but we do believe that it needs greater recognition in the strategy.

18. We were surprised to see no reference to, or discussion of, the recent challenge laid down by the Cabinet Secretary in the area of civic and cultural engagement. This challenge, utilising the USA notion of HEIs as ‘stewards of place’ to illuminate the wider issues, chimes well with many of the FGA indicators and with the notion of ‘cohesive communities’. It is likely that when the ‘how’ of the strategy is developed in this area, measures and indicators will need to be developed.

19. Page 22 contains the statement ‘there is a need to support the teaching of Welsh culture and history’. We concur with this view. This is an area in which the FGA could have been used to strengthen the rationale. As the Learned Society of Wales
has suggested in its analysis of the need for ‘Wales studies’, ‘underlying the delivery of the 8 national “well-being goals” [of the Act] are people’s knowledge and awareness of what it means to live in a modern Wales; to have an affinity to Wales; and to be able to participate in Welsh society.’ In this area, the draft strategy should explicitly adopt the LSW’s wider definition of the field, taking it beyond a traditional narrow cultural view. The LSW defines Wales studies thus: ‘The inclusive term “Wales Studies” embraces the wide range of new and existing multidisciplinary subjects that captures the knowledge and understanding of Wales covering history, sciences, politics, sociology, literature, archaeology, health, education, Welsh language, Welsh Studies, technology, arts, music and natural environments.’

20. The circular accompanying the draft strategy states that the strategy is “inclusive of further education but not explicit in its coverage.” While we understand the desire not to pre-empt any changes that may follow on from the Hazelkorn review, this approach does not seem very future-proof. Given the focus on flexible learning, collaboration, and pathways in and out of HE, it would seem sensible to be more explicit about the links between HE and FE and for the strategy to encompass the entire post-compulsory learning sector.

21. Internationalisation features in the draft strategy and has an important role to play as HEIs consider their future especially in the post-referendum policy context. With that in mind the strategy should say more about demand from international students and the implications of Brexit. The draft strategy could also make greater reference to international comparators and other HE systems and approaches.

22. The draft strategy makes a number of references to ensuring that graduates and employers understand higher level skills and how they can be used in the workplace (p.9). We feel that there should be a more robust analysis within the strategy of the skills that graduates will require in ten years’ time in order to better assess demand. Institutions need to commit to understanding and providing appropriate hard and soft skills for graduates, especially within a funding context that increasingly shifts the cost of study towards the individual.

23. Higher Education policy is devolved and the Welsh Government’s vision for HE in Wales differs in certain important respects from that of the UK Government. HEIs in Wales are keen to respond positively to the Welsh Government’s policy approach but it is also important to recognise that they operate within a UK-wide HE system and in the case of undergraduate student recruitment the system in Wales is heavily integrated with that of England. There is cross-border flow of students and staff and institutions are not immune from the impact of decisions taken in Whitehall. The draft strategy should seek to foreground this more and recognise the position of Welsh HEIs within the wider UK HE system.

Are there any gaps in how the higher education system needs to respond to the demand identified?

24. Distance learning has the potential to make an even greater contribution to support flexibility and widen access to higher education. A stronger commitment to supporting and enhancing distance learning and digital HE provision (including MOOCs and short courses) should be referenced in the strategy – not least as these developments constitute a competitive threat to HE and its institutions in Wales. This is particularly relevant as the strategy looks ahead to 2026; it will be essential for HEIs, with support from HEFCW, to consider future trends in HE.
delivery. Development of distance learning and digital learning platforms and courses will enable more people from a range of backgrounds and circumstances to access HE, it could also contribute to a reduced carbon footprint across the sector.

25. We believe that there should be more reference to different modes of provision in the strategy in order to ensure that institutions can respond to the demands, both social and economic, for flexible higher education. The OU in Wales welcomes the draft strategy’s commitment to adult-learning and flexible approaches (such as on pages 8/9 and 17/18) but we would like to see more emphasis on these including explicit references to modular study and ease of transfer between institutions. The different needs of students who choose to study part-time or through more flexible modes of study also need to be foregrounded in the strategy. These students will require different types of support from their institutions and the wider HE system. The new strategy should reflect this but refocusing the HE system to one that puts the individual student at the centre and mode of study as secondary will require a significant step-change in how we deliver and support higher education.

26. Specifically in relation to the development of Initial Teacher Training (ITT) in Wales (p.15), part-time higher education has a major role to play in developing and supporting the teaching workforce. Likewise in the other priority workforce areas identified in the strategy such as health and social care, the use of flexible provision to upskill existing staff and enable as many people as possible to access careers in these areas will be essential.

27. In order to promote the ability to upskill and reskill the workforce, wider HE policy and funding structures such as the current Equivalent or Lower Qualification (ELQ) ruling will need to be reconsidered. The implementation of the recommendations of the Diamond Review should go some way to addressing these issues but a continued commitment to the development of a funding and support system that enables life-long learning will need to be a key element of the new strategy.

28. The strategy mentions the diversity of the student body, and the future potential student population, which is to be welcomed. However, there is little mention of the diversity of HE Institutions themselves or recognition that they may each have different strengths and areas of expertise. Wales’ HE institutions have a strong track record of collaboration and partnership (within and outside the sector) but the strategy could say more about the opportunities for institutions to further specialise, with public investment placed where it secures greatest value, to meet specific objectives (as is already the case in allocation of QR funding).

29. Within the section entitled ‘A More Equal Wales’ while recognising the high-level, strategic nature of this document there could be clearer links to the Welsh Government’s anti-poverty agenda and the successor to the Communities First programme. These links are essential in widening access and ensuring synergy across Welsh Government priority areas. The Open University in Wales currently undertakes a range of community-based activities in Communities First areas in order to widen access to HE, we are keen to build on this type of work and would like to see it given prominence in the new strategy.

30. Within the section entitled ‘A Wales of Cohesive Communities’ there is a strong, and welcome, focus on the civic role of institutions and the role of universities in their communities. The focus of this section, perhaps understandably, is the geographical link between an institution and its surrounding area and community but there should also be a consideration of what institutions can and should offer in terms of civic engagement beyond their immediate surroundings. As a pan-Wales
institution the OU in Wales would be keen to see a focus on the potential of digital innovation to connect and build communities and a consideration of the non-traditional ways in which people can be brought together.

Are the statements of intention appropriate?

31. The strategic intentions seem broadly appropriate but the format of the draft strategy is such that, despite seeking to offer a high level approach, taken together the lists of strategic intentions are fairly extensive. Aligning the strategy and intentions to the Well-being of Future Generations Act is an important step in joining up Welsh Government priority areas and ensuring that HE providers understand the implications and opportunities of the Act. However, this approach seems to have resulted in duplication in some areas and a conflation of some high level intentions with others that seem more operational. While retaining the alignment to and spirit of the Act it may be more efficient to present the final strategy in a way which presents a smaller, high-level set of strategic intentions in a coherent way.

32. There seems to be little emphasis in the statements of intention for innovation or change, they are all worthwhile aims but some are so generic that they run the risk of being meaningless if they aren’t given greater depth. Fewer, more innovative and forward-looking statements would be more appropriate for a ten year strategy.

Are there any statements of intention that should be added or removed?

33. There should be more reference to flexibility in relation to study options, course provision, types of courses, pathways in and out of HE and the ability to transfer between providers.

34. There should be more on current and future areas of business and economic development to ensure that the strategy is future-proofed.

35. Explicit reference should be made in the statements of intention or elsewhere in the strategy to other Welsh Government priority strategies such as those relating to skills, economic development, welsh language and anti-poverty.

36. As mentioned above there is duplication between statements which should enable consolidation in some areas. The final list could be more strategic and focus more on looking ahead to the future. In some cases it seems that statements may have been included in order to meet an objective of the Well-being of Future Generations Act and while these are important areas for HEIs to consider they may not be appropriate in a high level list of statements of intention. For example, “Encouragement to employees to have healthy lifestyles…”(p.14)

Are there any equality and diversity, Welsh language, or sustainability issues relating to the strategy which you have identified?

37. In order to ensure that higher education is open and accessible to all there needs to be a focus on appropriate information, advice and guidance on choice of courses and pathways – this equally applies within non-HE settings. It is also important to ensure that students are ready for HE and that those who need extra support before entering HE have the option of suitable access modules, preparatory courses, advice and support.
38. The potential of online learning to support new and innovative ways to deliver courses, including through the medium of Welsh, could have a profound impact in opening up higher education.

39. The strong focus on adult and life-learning learning throughout the strategy is welcome as is the recognition that this extends beyond women and those from disadvantaged groups and can also include young men and males who are employed but would like to upskill or reskill.

Have you any further comments on the draft strategy?

40. As a ten year strategy that comes at a time of significant political change and uncertainty, within the domestic policy and funding environment and beyond, the wider purposes of HE and a broader, more strategic vision should be front and centre of this document if it is to last ten years and offer the strong framework that is required.

41. There should be more reference to the interconnected nature of Wales’ HE system with that of the rest of the UK and of the potential impact of Brexit on our institutions and students.

42. We believe that the strategy should be more outward looking and consider Wales’ place as a global HE provider and an international competitor.

43. The strategy says very little about the future role of HEFCW and the corresponding regulatory framework, we appreciate some of this is unknown at present but it would make sense to include it as part of a sustainable, ten year strategy.

44. The timescale for the development of the strategy is tight and while we recognise that this has been in part dictated by the Welsh Government’s request to produce a strategy it is important to ensure that whatever is produced can last and provide a framework that matches the policy environment. It may be more appropriate to wait to publish this strategy once more is known about the implementation of the recommendations of the Diamond and Hazelkorn reviews. This would also allow for wider consultation as a ten-year strategy that draws heavily on other policy areas requires broad input, robust consultation and strong engagement from across the sector and beyond.

45. Finally, as mentioned in the body of our response we believe there is an opportunity to implement a shift in HE policy and delivery that puts the individual student (whatever their background and circumstances) at the heart of the policy. This may require Wales’ HEIs and other post-compulsory education providers playing to their individual strengths while also working collaboratively towards a common set of goals.

The Open University in Wales would be pleased to provide any further information as required by HEFCW as the strategy is developed and we look forward to contributing to its further development and then to its implementation.

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