

Support for postgraduate study and part-time engineering, technology or computer science degrees

Consultation response form

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Responses should be returned by **26 May 2016** to

Higher Education Division
Skills, Higher Education and Lifelong Learning Directorate
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and sent to: e-
mail: HEDConsultationsMailbox@wales.gsi.gov.uk

About The Open University in Wales

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.

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. More than two-thirds of Open University in Wales 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.

In 2015, for the eleventh successive year, The Open University was at the top of the National Student Survey in Wales for ‘overall student satisfaction’. 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.

A. Support for postgraduate study

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

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

The Open University in Wales supports the case for change set out in the consultation document and agrees that there is a convincing rationale for the provision of postgraduate financial support. We believe that in order to effectively meet policy aims of increasing social mobility and enhancing economic development any postgraduate loan scheme should be made fully available to part-time students. 68% of OU in Wales students are in work while they study with us, many students wish to undertake postgraduate courses in order to re-train or upskill and distance learning is often the most suitable way for them to do this.

We strongly support the intention to provide a Welsh postgraduate loans system which broadly mirrors the loan regime on offer in England. However, the proposed Welsh system as currently set out in the consultation does not offer parity with England in respect of part-time students and we would like to see this rectified. We offer more detail on these concerns in our response to question two.

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

Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

Our comments on the package as outlined and changes we would like to see are as follows:

Study Intensity:

As outlined in the consultation document the support package does operate on the same criteria as the package on offer in England and does not offer parity of esteem to part-time students.

We welcome the specific inclusion of distance learning courses in the proposals but the proposed 50% of full-time study intensity threshold discriminates against those who have no choice but to study at a pace of less than 50% but nevertheless face financial barriers. This includes those in full-time employment and some disabled students.

We believe that a study intensity of 25% would be an appropriate threshold and would increase access to postgraduate study for a greater number of individuals.

It is also essential to note that the UK Government's postgraduate loan scheme for students in England was amended in the March 2016 budget to ensure greater access for those wishing to study part-time. While the UK Government's scheme retains a 50% study intensity threshold the eligibility criteria have now been extended to include three-year part-time courses with no full-time equivalent¹. If the Welsh Government is not minded to reduce the study threshold to 25% then it is essential that a similar amendment is made to the Welsh policy in order to ensure that many Open University students will be eligible for the postgraduate loans system.

Loan payments:

A particular challenge for institutions and students will be that fee liability for modules/courses is incurred at the start of courses, but given the phased payment schedule, students may not receive enough in the first payment to cover their module fee costs. This might actually prevent some students from being able to study or might mean students having to take out bridging finance. It would be much more helpful to students and institutions if payments to students could be front loaded rather than paid in three equal instalments.

Study breaks:

We also believe that it would be beneficial to enable the loans system to accommodate students who may need to take study breaks, our understanding is that this is also currently being considered within the loan regulations in England.

¹ UK Government, Budget 2016

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508193/HMT_Budget_2016_Web_Accessible.pdf (p.34)

Particular points to note about The Open University:

The OU has a particularly high proportion of UK-domiciled postgraduate students, because typically our students are in work in the UK (and contributing to the UK economy while they study). Any eligibility criteria that exclude or disadvantage the OU would seem contrary to the aim of boosting Postgraduate study by Wales-domiciled students and addressing the higher level skills gap in Wales.

Designation:

Our interpretation of paragraph 33 of the consultation document is that, for the purposes of these regulations, the OU will be a designated provider in England, given that our regulatory body is HEFCE. We therefore believe that OU courses would be eligible for postgraduate loan support in Wales, as they are in England, and welcome this proposal. However, due to the unique way the OU operates across the UK we would welcome clarification on this matter at the earliest opportunity.

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

If the amendments that we have suggested in response to question two are not made to the policy then we believe that part-time students will be disadvantaged by this policy. Women, older people, carers and those in work often choose to study part-time as it offers them a flexible route into higher education, without this option many people would not be able to access HE. These groups may be disproportionately impacted if the suggested amendments to the policy aren't made.

B. Previous study and support for part-time study

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

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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The Open University in Wales believes that it is highly beneficial to extend statutory support to students with equivalent level qualifications (ELQ) on engineering, technology or computer science courses as has been done in England. We believe that this will go some way to meeting Wales' skills needs, meeting employer and student demand for reskilling and in developing the Welsh workforce. The Open University's experience of the ELQ relaxation in England suggests that this has had a positive impact on the numbers of students choosing to study part-time and a

particularly positive impact on uptake by women – traditionally under-represented in science, technology, engineering and maths subjects and occupations².

While women constituted 57.2% of all first year undergraduate university students in the UK in 2013/14, they made up only 13.8% of engineering and technology students and 15.3% of computer science students. OU data confirm that around 40% of the enquiries that we have received about ELQ exemption to study in these subjects in England since the 2015 relaxations are from women – a significantly higher proportion than seen for new female students in most STEM subjects.

However, we do not believe that the ELQ proposals set out in the consultation document go far enough and they do not offer parity with the ELQ exemptions being offered in England. We believe that it would be beneficial for any Welsh system to offer the same ELQ exemptions as England and to seek to keep pace with any further changes or even seek to be more generous based on an analysis of the particular skills needs of the Welsh economy. We have expanded on this in our response to question six.

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

In the longer term and as finances allow we believe that it would be beneficial to consider the removal of all ELQ restrictions for all subjects in order to ensure that as many people as possible are able to access part-time higher education.

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

The consultation suggests that the new ELQ exemption in Wales will commence in academic year 2017/18. Exemptions will be made for eligible students who start part-time Honours degrees in engineering, technology or computer science. The rationale for the choice of these subjects is that they are viewed as subjects of importance to the economy. The Welsh Government consultation proposes to make “a similar exception” to that on offer in England. However, in the March 2016 Budget the UK Government announced that from academic year 2017/18 ELQ exemptions would be extended to cover all Science, Technology, Engineering and Maths (STEM) courses³. The OU in Wales believes that the Welsh Government should implement the same exemptions in 2017/18 as those that will be available in England and should therefore immediately extend the scheme to include all STEM subjects. This

² Latest figures show that women make up 14.4% of all people working in STEM occupations. Source: [WISE](#) analysis of Labour Force Survey data from August 2015.

³ UK Government, Budget 2016
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508193/HMT_Budget_2016_Web_Accessible.pdf (p.34)

would ensure that Wales offers parity with England and could make the schemes easier for students to understand. A current Department for Business, Innovation and Skills consultation is also underway on 'Reforming Healthcare Education Funding'⁴ this proposes extending ELQ exemptions to nursing, midwifery and allied health qualifications following the removal of the NHS bursaries in these areas. The implications of this policy for Wales will also need to be considered as part of the development of the ELQ exemptions policy.

In terms of any further extensions we believe that ELQ student access to tuition fee loans for part-time study should also be expanded to include:

- Additional qualification routes (including conversion qualifications and graduate certificates / diplomas) as well as full undergraduate STEM degrees.

- 'Half-STEM' degrees. Where at least half of the content of a degree is in a STEM subject e.g. *BSc Computing and Business*, ELQ students would be eligible for a fee loan for that half and would self-fund the remainder.

Question 7 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

N/A.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

⁴ Available at <https://www.gov.uk/government/consultations/changing-how-healthcare-education-is-funded>