
HEFCE ELQ consultation response

Institution/organisation : University and College Union

1a

Have we responded appropriately to the Government's instruction that certain categories of student should be exempt in the light of Student Fees (Qualifying Courses and Persons) (England) Regulations and Education (Student Support) Regulations?

1b

Comments

The University and College Union (UCU) is very concerned about the principle and effects of the proposed ELQ funding cuts. Ministers have said that the £100 million will be redistributed to support government priorities, including the challenges posed by Sandy Leitch on increasing graduate level skills and the continuing need to widen access to HE. However, the current proposals will have exactly the opposite effect to the government's and HEFCE's stated aims. Modern labour markets require up-skilling and re-skilling and ELQ students are the very ones re-training, updating professional skills and accessing the life-long learning which the Prime Minister and Lord Leitch espoused. The Government's suggestion that ELQ students will get all funding from their employers to undertake their studies is not borne out by current statistics or evidence. Significant numbers of adults, therefore, will discontinue their lifelong learning because they can't afford it. Moreover, their withdrawal from the HE sector will make large tracts of university continuing education unviable, often in the very institutions criticised for not doing enough to widen participation.

We are continuing to raise our concerns with ministers and civil servants and alongside the NUS and a host of vice-chancellors, we are calling for the DIUS to withdraw the proposed policy. In our view, the introduction of various exemptions, such as for ELQ students on teacher training and NHS-related courses, fails to resolve the fundamental flaws in the current proposals.

2a

Do you agree with our proposal to continue providing public funding for students studying for a foundation degree as an equivalent or lower qualification (ELQ)?

Agree

2b

Comments

The UCU agrees with the principle of continuing public support for ELQ students on foundation degrees. However, the exemption rule must include an open module system allowing flexible study patterns (extended over years) and with a flexible provision with respect to the nature of employer engagement.

At the same time, we would like to reiterate our reservations about 'cherry picking' various degree courses and subjects for continued public support, whilst at the same time encouraging a full fee regime for ELQ students on non-HEFCE funded courses. It is our view that when HEFCE funding is scrapped universities will have no option but to treat ELQ students like international students.

The introduction of exemptions is also likely to result in an increase in institutional 'games playing', such as the repackaging of existing undergraduate provision as 'foundation degrees'.

3a

Do you agree with our proposal to allow students studying for an ELQ to count towards the delivery of separately monitored co-funded additional student numbers (ASNs)?

3b

Comments

The UCU believes that there is a need for all courses delivered through partnerships with publicly-funded, voluntary or other organisations co-funding lifelong learning to be exempt from the ELQ funding withdrawal.

4a

Do you agree with the proposal to introduce an allocation for strategically important and vulnerable subjects (SIVS), calculated on the basis of ELQ numbers studying SIVS?

4b

Comments

While we welcome additional public support for strategically important and vulnerable students (SIVs), it is difficult to see the logic behind these decisions. For example, why are ELQ students involved in land management and courses related to EU accession countries publicly supported while ELQ students on courses related to business, law, psychology and housing receive no public funding for their studies?

Another area of concern for UCU is the effect on courses required for skills in the cultural and heritage Sector. We believe that these courses - as indeed in other skills sectors - should be fully exempt from the ELQ funding cuts.

5b

Do you agree that we should provide a supplement to the part-time targeted allocation?

Strongly agree

5b

Comments

We strongly welcome the introduction of a supplement to the part-time targeted allocation

but we do not feel that this will be sufficient to address the problems faced by part-time institutions such as Birkbeck and the OU. Modelling by HEFCE and UCU shows that part-time students and the institutions which teach them will be badly affected by the proposed cuts. For example, the Open University is set to lose over £31.6 million in teaching funding by 2014-15 and Birkbeck is set to lose £7.8 million over the same period. But it is not just an issue affecting these two special institutions. Universities like London Metropolitan, Sunderland and Wolverhampton - who do major work to support widening participation and employment engagement - will also experience significant reductions in public funding.

6a

Do you agree with our proposal to aim to provide 'safety net' funding to maintain each institution's grant at a comparable 2007-08 level in cash terms?

6b

Comments

The 'safety net' proposals will provide some assistance to institutions that are badly affected by the ELQ proposal. However, the 'safety net' may only be in place for three years and because there will be no inflationary increases it will still result in a loss of income for part-time orientated institutions.

7a

Do you consider that the ELQ policy outlined in this document is likely to have a differential impact on students, depending on their gender, race, whether they have a disability, or any other extraneous factors?.....If so, how might this be mitigated?

Strongly agree

7b

Comments

The ELQ policy is likely to have a disproportionately negative effect on the participation of women returners and also on older men looking to retrain. We are also concerned that institutions with large numbers of Black and Minority Ethnic students, such as London Metropolitan University and the University of East London, suffer particularly badly in the ELQ funding cuts.

Though we welcome HEFCE's concern about these issues, an equality impact assessment needs to be conducted before a policy is announced. The failure of the DIUS to do this is another reason why the ELQ policy should be abandoned.

In the event of the DIUS failing to withdraw the policy, we believe that HEFCE should exempt all individuals returning to study after more than a five year break. The purpose of this would be to enable students to re-skill after a break from higher education and would help to address some of our equality concerns.

8

Do you have any further comments?

We have a number of additional criticisms of the proposed ELQ funding policy. These are as follows:

- We regret the fact that DIUS announced this major policy shift without prior consultation

or parliamentary debate. And while we recognise that HEFCE is responsible for simply implementing the policy, we are dismayed that you came up with this policy option. Your current proposal will not simply affect so-called 'serial degree chasers' but will cause immense damage to part-time education and short courses in HE. Cuts in this area will have a detrimental impact on widening participation as well as falling particularly hard on disabled learners, learning for regeneration, learning for social cohesion, etc.

- Under the current proposals, institutions will have their teaching grant reduced on the basis of incomplete student data and for students recruited in 2005. This amounts to a retrospective fine for institutions.

- The new policy will require a complex additional bureaucracy to police the new system (for example, in verifying previous degree qualifications). How is this policy compatible with the desire to reduce the burden of regulation in higher education?

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