

College responses

1a

Do you agree with our proposed approach to offering ongoing flexibility and some increase to the student number control allocation for those institutions demonstrating strong demand?

Agree

1b

Comments?

We support the continuation of flexibility within the student number control (SNC) mechanism. In particular, protection against volatility in either direction is crucial. Institutions should be able to continue to recruit under (as well as above) their SNC allocation.

Some institutions may wish to maintain their student population at existing levels. Thus, and to protect against volatility, we agree that recruitment under the SNC allocation but within the flexibility range, should not result in a change to the SNC allocation for the following year.

Whilst the approach outlined would enable some institutions with high demand and high quality to increase their student population, it should not be assumed, nor indeed expected, that all will wish to do so. In the interests of quality, appropriate student:staff ratios and the educational experience, institutions should be free to determine the size of their population bearing in mind that many face constraints on the size of their estates, for example.

2a

For institutions whose SNC allocation has been reduced should we offer a) only a degree of flexibility equivalent to that provided to those that have not had their allocations reduced, or b) as we have proposed the potential of further flexibility for one year that provides a greater opportunity to recover?

(a) Only a degree of flexibility equivalent to that provided to those that have not had their allocations reduced

2b

Comments?

We believe that the mechanism already allows for recovery without the need for further flexibility. Exceptional circumstances should be handled through an appeal mechanism rather than through automatic additional flexibility.

3a

Do you agree that the proposed characteristics of an approach to flexibility will meet the needs of those institutions that wish to grow, while appropriately protecting others from volatile changes in student number control allocations?

Neither agree or disagree

3b

Comments?

Flexibility should protect against small and uncontrollable fluctuations in recruitment resulting in a change to SNC allocations. Such fluctuations in recruitment could be in either direction, therefore we suggest that the first characteristic be amended to "...a level of flexibility to allow institutions to recruit above or under their student number control allocations."

A further characteristic should be that institutions which wish to retain a broadly stable Undergraduate population size should not have their SNC reduced.

4a

Will the proposed approach offer students more choice while also protecting the student support budget?

Unsure

4b

Comments?

The student support budget would be protected only by a relatively stable Undergraduate population, such that increases at particular HEIs are matched by a fall in demand elsewhere within the sector.

Were this not to be the case, student numbers would need to be cut from institutions who have recruited within the flexibility range, which would reduce student choice, and which we would not support.

5

Can you envisage any unintended or undesirable consequences of the proposed approach?

If growth is not matched by a fall in recruitment elsewhere, then the student support budget could be protected only by the application of scaling factors to institutions which have recruited within the flexibility range. This could result in a gradual and continued erosion of the SNC of institutions who wish to maintain their student population, and force them to contract.

It is important for HEFCE to continue monitoring the effect of the SNC mechanism on academic provision to guard against unintended consequences, particularly for STEM subjects, which are of strategic importance.

6

Do you have any comments on the proposed methods for publicly funded institutions who wish to enter into a relationship with HEFCE so that their students are able to receive student support from 2015-16 and beyond?

We do not agree that places should be distributed to new providers via a pro-rata reduction of the student number control across all institutions. This would not be equitable for existing high quality providers which have recruited within their flexibility range and would reduce the amount of choice for students who wish to study at established institutions.

7a

Do you agree that the key requirements we have set out are reasonable?

Neither agree or disagree

7b

Are there other key requirements that you think we should take into consideration?

We believe a further key requirement which needs to be considered is that, in order to facilitate student choice, high-quality recruitment should be encouraged. Thus, there should be no incentive to reduce academic entry standards in recruitment.

8a

In Table 1 we have set out a number of options for exempting combinations of qualifications from the student number control which we do not believe are viable. Do you agree that we should discount these options?

Agree

8b

Do you think there are other options that we should consider?

We agree that the alternative options presented are not viable. We do not believe there are any other options that need consideration.

8c

Comments?

No further comments.

9

We have set out proposed criteria in this section for exempting a limited number of the most common combinations of qualification types from student number controls. Do have any comments on the proposed criteria? Do you have any comments on the approach in general?

We are concerned that any expansion in the number of exempt combinations may place increased pressure on the student support budget. The potential growth in the population of students taking different combinations of qualifications needs to be considered before extending the exemption list.

Extending the exemption list as proposed will also add significant complexity, but the benefits of doing so are not clear.

10

Do you have any further suggestions for additional or different criteria for excluding combinations of qualifications?

We believe that any further extension to the exemption list will add complexity, place pressure on the student support budget, and will not benefit student choice.

11

Do you have any comments on our proposed approach for implementing a change to the exemptions list? Are there other aspects which we should consider?

The proposed approach for implementing any change to the exemptions list seems reasonable.

12

Do you consider that there are any equality considerations we have not taken into account? Does the proposed approach require an institution either to disadvantage a particular group of students, or prevent steps being taken to assist a particular group? If so, which group(s), and how may the approach be modified to reduce these effects?

We do not believe that the proposals will disadvantage any particular group of students, but we do not believe it will significantly benefit any particular group either.