

## BIS Consultation: Applying Student Number Controls to Alternative Providers

million+ submission

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### Question 1: Respondent details

million+ is a university think-tank which provides evidence and analysis on policy and funding regimes that impact on universities, students and the services that universities and other higher education institutions provide for business, the NHS, education and the not-for-profit sectors.

### Question 2: Do you have a preference for Method 1 (control based on eligible students) or Method 2 (control based on students accessing funding)? If so, why is this?

Any numbers allocated to alternative providers with designated courses should be additional to those currently accessed by HEIs and FECs. In the absence of clarity about how the new control will operate in relation to the existing SNC, our preference is for Method 2.

In the interest of consistency we welcome the confirmation that HEFCE will lead on the administration of the new course designation system.

The principle that the control should be flexible enough to recognise that some courses run outside the traditional academic yearly cycle is sound. We therefore urge the government and HEFCE to ensure that the principle of flexibility is also applied equally to HEIs and FECs.

### Question 3: What is your view on submission of data to HESA? Do you think designated courses at alternative providers should participate in the Key Information Set and therefore complete the National Student Survey and Destination of Leavers in Higher Education survey (if student numbers are large enough to permit this)?

We strongly support the view that *all* providers (both designated and alternative) who are in receipt of public funding should submit a return to HESA.

HESA is designated as a producer of Official Statistics under the Official Statistics Order 2008, and provides a comprehensive body of reliable statistical information and analysis about UK higher education to Government as well as to the sector. It is essential that HESA statistics cover all aspects of HE provision.

In addition, the principle that all providers in receipt of public funds should make information available to applicants (and others) through the KIS and other forms of public information is sound.

### Question 4: Are there any other methods for controlling student numbers on designated courses at alternative providers that you would recommend instead of Method 1 or Method 2?

No comments.

**Question 5: Do you agree that there should be an exemption from student number controls for alternative providers with small numbers of students accessing student support? If so, do you have suggestions as to how the Department should define ‘very small’?**

In principle we agree that it would be disproportionate and excessive to apply the SNC to very small alternative providers. Nonetheless since the costs of tuition fee loans and student financial support can be significant for even relatively small providers, exemption from the SNC should only apply to those providers with fewer than 25 students.

It is likely that some small alternative providers below this threshold will be planning to grow numbers. There will need to be a process whereby this can be planned and controlled appropriately, and associated risks identified.

**Question 6: Equality considerations: Do you think that the proposals for applying student number controls will have any equality implications (e.g. positive, negative, or neutral) for people with protected characteristics (as set out in the Equality Act 2010), or people from low income groups? What impacts might there be and do you have any evidence of possible impacts?**

An equality impact assessment should be undertaken to guard against any negative impacts.

**Question 7: Do you have any other comments on the proposals within this consultation document?**

Consistent with the £6,000 maximum tuition fee loan, alternative providers are not currently subject to the requirements of the independent Director for Fair Access. There is a case for making the link between these two issues explicit so that if the maximum tuition fee loan is increased, then alternative providers become subject to OFFA requirements on the same basis as HEIs and FECs.