



Department for Business, Innovation & Skills

Applying Student Number Controls to Alternative Providers with Designated Courses. Response form

There is no obligation to use this form when responding, but doing so will make your responses easier to analyse. There is no obligation to answer all questions. We look further to receiving your feedback.

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is **23 January 2013**

Please return completed forms to:
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This reply is sent on behalf of St. George's, University of London (HESA ID 0145)

Date : 21 Jan 2013

Submit by : [redacted] Senior Planning Officer

E-mail : [redacted]

Question 1

Name of organisation [redacted] response is a personal response and is not submitted on behalf [redacted] organisation?

What type of organisation is it? (e.g. Alternative Provider, HEI, FEC, Regulatory Body etc.)

This response is on behalf of St. George's, University of London which is a publicly-funded HEI.

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?

Since the majority of funding to institutions will move to the graduate contribution, it is only fair that all institutions who have courses eligible for funding via the Student Loan Company, are treated equally. We therefore support method 1, which is the method to which publicly-funded institutions are currently subject. We also support the request that the alternative providers be asked to report to HEFCE on recruitment against their SNC limit, in the same way that publicly-funded institutions are accountable via HESES. We also support that HEFCE be responsible for undertaking credibility checks on the data submitted to them by alternative providers, in the same way that publicly-funded institutions are subject to credibility checks.

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)?

Since the majority of funding to institutions will move to the graduate contribution, it is only fair that all institutions who have courses eligible for funding via the Student Loan Company, are treated equally. We therefore support the requirement that alternative providers be asked

- to report to HESA on student numbers as a check on the numbers recruited against their SNC limit (as undertaken by HEFCE currently for publicly-funded institutions),
- to report to HESA so that their data is available to statutory customers, in the same way that publicly-funded institutions data is,

- c. to report to HESA on graduate destinations data,
- d. to report to HESA on data for KIS,
- e. to participate in the NSS.

A publicly-funded institution is required to report information on all their students to HESA, not just those subject to HEFCE teaching grant or who are eligible to access loans or grants from the SLC, therefore we propose that alternative providers be asked to report on all their students to HESA, not just those who count towards the SNC.

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, but as noted in response to question 2, we support method 1 over method 2, as method 1 is the same as that currently applied to publicly-funded institutions.

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'?

Balancing the burden of the requirement to report information to statutory bodies versus the amount of support paid to the students of alternative providers, we suggest that an exemption from the SNC should be given to providers with 40 or fewer full-time students accessing student support. This is because (from the data in table A.2 of the BIS consultation document), alternative providers with 50 students or more studying full-time, accessed student support of £ 90.8 m in 2011-12; this was 91% of the total support paid to full-time students at alternative providers.

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?¹ What impacts might there be and do you have any evidence of possible impacts?

¹ Section 149(1) of the Equality Act 2010 imposes a duty on Ministers to have due regard to three specified equality matters when exercising their functions. These are: a) eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by the Act; b) advancing equality of opportunity between people who share a relevant protected characteristic and people who do not share it; and c) fostering good relations between people who share a relevant protected characteristic and people who do not share it. The Equality Duty covers the following protected characteristics: age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. The duty to have due regard to the need to eliminate discrimination also covers marriage and civil partnerships.

In the outcome to HEFCE consultation on 'SNCs and teaching funding in 2013-14 and beyond' (publication 2012/19) HEFCE agree that they are best placed to take the lead in assessing the impact on determining how far the Government's policies on the *current* SNC policy will affect recruitment of students with protected characteristics. In order to assess any impact, HEFCE will require data from alternative providers about **all** their recruitment, not just that which counts towards the SNC. Therefore, we would propose HEFCE assess the impact and do this by asking alternative providers to undertake a HESA student return for **all** their students.

Question 7

Do you have any other comments on the proposals within this consultation document?

We agree that BIS should give HEFCE the power to impose financial penalties on alternative providers who recruit in excess of their SNC limit.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below:

Please acknowledge this reply

Yes

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

Yes

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