

Student number controls - Consultation on arrangements for 2014-15 onwards: Russell Group submission

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?

The proposals provide a reasonable way for achieving some redistribution of places between universities on the basis of recruitment the previous year. However, the following points are also important to ensure the system operates effectively and fairly:

- The protected core provides an important element of flexibility for institutions with a small core population and this should be retained alongside the proposals in this consultation. This flexibility supports highly-selective universities that offer some places to high-achieving students with non-exempt qualifications (particularly EU qualifications).
- The current arrangements already make recruitment increasingly challenging to manage and have significant associated resource requirements, as recruitment requires ever more complex analysis to model and manage the recruitment cycle. In particular, the notification of student number allocations currently occurs at a late stage in the application cycle. This makes managing the process even more challenging for universities, and could make it difficult to respond to opportunities for marginal growth.
- Flexibility for small providers should not be increased beyond the level set out in the consultation document. Any further flexibility for small providers would further reduce SNC for larger institutions, and the policy basis for such a redistribution has not been established.
- HEFCE use data obtained from the Individualised Learner Record and National Pupil Database which are not also easily available to universities. This means universities are unable to check calculations of their SNC which draw on these alternative data sources. Universities commit time and effort to making accurate statutory returns and this use of alternative data sources by HEFCE is unhelpful, as it undermines the statutory returns.
- We suggest that students on medical and dental foundation years which make them eligible for transfer to a full medical/dental degree course should be excluded from the SNC. Although such students do not fall under an NHS quota until they transfer to the full course, removing them from the SNC would mean they are treated the same as students falling under the NHS quota.

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?

Not answered

2b. Comments?

We see advantages and disadvantages with both options. In principle, flexibility is reasonable as the total number of students recruited by a university in one year is influenced by a whole range of factors.

Predictions have to be made about likely applicant behaviour, and when patterns change from year to year this all makes managing an overall target extremely challenging. This leads in the direction of support for option (b). However, it is also important to maintain controls on the student support budget, and with this in mind it could instead be argued that option (a) offers sufficient flexibility. Perhaps option (a) could be implemented but with exceptional circumstances 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?

It is difficult to judge in advance of implementation. Not all institutions will wish to grow, and therefore it would be better to amend the question, focusing on whether the method provides a level of flexibility to allow institutions to recruit above or under their student number control allocations. It is entirely possible some institutions may wish to grow by more than the upper end of the flexibility range, and in these cases their needs will only be partly met in that year.

4a. Will the proposed approach offer students more choice while also protecting the student support budget?

Yes

4b. Comments?

None

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

It will be important to continue monitoring the health of academic disciplines during implementation of these proposals. This includes subjects that are currently identified as strategically important and vulnerable, as well as other subjects that may encounter difficulties in future years. The consultation sets out one possible set of proposals for managing student numbers, in response to specific guidance from the current Coalition Government. We believe it would also be valuable to develop proposals for alternative mechanisms that could operate in future.

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 support top-slicing of allocations to existing universities in order to redistribute places to publicly-funded providers that do not currently have HE provision. The flexibility mechanism aims to allow universities in high demand to expand, and pro-rata top-slicing to provide student places to new providers would contradict that approach. There is no clear argument in favour of taking student numbers from universities with strong recruitment patterns simply to create places for new providers.

7a. Do you agree that the key requirements we have set out are reasonable?

Agree

7b. Are there other key requirements that you think we should take into consideration?

We would place particular emphasis on the key requirement that proposals should minimise the risk of unplanned student support costs, or costs that exceed the student support budget.

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?

No.

8c. Comments?

None.

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?

An alternative to introducing further exemptions is to ensure that universities have a protected core that is sufficient to admit students with such qualifications. Removing combinations of qualifications may increase the risk of additional student support costs being incurred. It will be important to ensure that the system does not become unnecessarily complicated to operate.

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

No.

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?

No.

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?

No.

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