



NWUA Response to HEFCE Consultation on the Withdrawal of Funding for Equivalent or Lower Qualifications (ELQs)

December 2007

The North West Universities Association (NWUA) is the representative body for the 15 HE Institutions in the North West¹ and is responding to the HEFCE consultation on the withdrawal of funding for equivalent and lower qualifications (ELQs) as the request of NWUA members who wished to submit a collaborative response through NWUA in addition to the individual responses made by NW HE institutions. The collaborative response supports the strong views of NW HEIs relating to this consultation and consensus of views across all HEIs in the region.

This response has been developed through consultation with the NWUA Board and NWUA Widening Participation and Skills Advisory Group and has been approved for submission by the Vice Chancellors and Principals of the 15 NW HEIs.

NWUA supports the suggested exemptions but there are concerns that some groups have been overlooked and that further exemptions should be considered in order to meet the aspirations of the Leitch Review and Implementation Plan. The concerns of NWUA member HEIs are outlined below.

NWUA members acknowledge the fact that these policy changes impact on some institutions to a much greater extent than others. Institutions particularly affected in the North West as the small specialist HEIs such as RNCM and LIPA; and The Open University. NWUA members feel that dialogue with the HE sector, around the withdrawal of funding for ELQs, should have been undertaken at an earlier stage in the development of the Government policy and objectives in order to achieve a less confrontational approach and to allow the full consideration of the impacts of any suggested policy changes. NW HEIs have serious concerns regarding the manner in which these changes have been imposed and feel that delaying the implementation of this policy would allow for greater consideration of the true impact of the policy on institutions of all sizes and missions. This suggested delay in implementation would be particularly critical within the performing arts sector and therefore for the RNCM and LIPA where face-to-face auditions are always conducted with every applicant.

¹ University of Cumbria, Lancaster University, University of Central Lancashire, Edge Hill University, Liverpool Hope University, Liverpool John Moores University, University of Liverpool, University of Chester, University of Bolton, University of Salford, University of Manchester, Manchester Metropolitan University, The Open University in the North West, Royal Northern College of Music (Associate Member) and Liverpool Institute of Performing Arts (Associate Member)

These institutions will have completed their full round of auditions, and have offered places, etc. long before the outcome of the consultation is known. The unseemly haste with which it is proposed to introduce the new policy will cause huge problems for students who have applied for courses in all good faith on the basis of information (including fees, etc) published well before the withdrawal of funding for ELQs was even considered.

Although NWUA members understand the DIUS rationale for withdrawing funding for ELQs there are serious concerns that the withdrawal of funding in this area will have wide ranging consequences which have not been fully considered. One potential activity which will be seriously affected is the re-skilling of employees from certain sectors, potentially involving people undertaking an ELQ. This is particularly important in sectors such as health sciences, children's workforce and teacher education. This re-skilling has equal importance for the economy of the region and the economy of England as the up-skilling of those who have not previously experienced higher education. If Government policy is to expect employers now to pay for this re-skilling then further consideration needs to be given to the policy around Student Fees Regulations. These regulations could be amended to allow students wishing to re-skills to fund themselves, this would avoid having policies which not only demonstrate the Government's policy not to subsidise people studying for an ELQ but also actively prevent individuals from developing themselves due to imposed regulations.

The student fees regulations also impact on students who do not make full and honest disclosures regarding prior qualifications. Government funding is withdrawn on discovering the full information but HEIs do not currently have the ability to then charge full fees to cover the costs incurred, therefore resulting in the HEI suffering a loss for that student. This area will need serious reconsideration given the changing policy around ELQs. NWUA members also have concerns regarding the burden of scrutiny that would fall upon HEIs to validate students' previous qualifications and determine their equivalence, Universities would then be held as the guarantors of these entry qualifications and this would result in a significant increase in administrative burden for institutions.

Generally the NW HEIs believe that the withdrawal of funding for ELQs goes against the current policy focus of increasing levels of engagement between employers and the HE sector to increase work-based / work-place HE provision and improve the knowledge economy of England and the 9 English regions. When HEIs engage with employers to meet their skills needs there is often significant needs for re-skilling of employees and continued development of the workforce and this often involves training people who already have a HE qualification, whether related to their current sector of employment or not. Many learners will study for an ELQ in order to gain the experience they require for career change or career development. An example would be in the aerospace industry where there is a move to using composites in the manufacture of aeroplanes and aircraft as opposed to traditional metal components. This has resulted in the need to re-skill large numbers of employees to design and manufacture relevant components in composites which requires different knowledge and skills to designing and manufacturing using the traditional metals. The cost of re-skilling within the STEM sectors is particularly high and employers are often not inclined to pay for employees. However, re-skilling is critical to the STEM related

sectors due to the high rate of change in these areas resulting from new innovations and technology and the need to respond to these changes in order to remain competitive.

Every sector has identified management and leadership issues, without sufficient leaders businesses will not prosper and the knowledge economy will suffer, people are generally recruited to management positions due to being successful in their technical role and will often be qualified to a very high level in a technically related discipline. However, to provide these people with the relevant management and leadership skills to lead and grow the business, training is required at a level which will usually be equivalent to or lower than their existing technical qualifications.

Given the predicted demographic patterns over the next few years, and the knowledge that 80% of the workforce for 2020 has already left compulsory education, the need for re-skilling and retraining should be of increasing importance in the UK if we are to achieve the Leitch ambitions. Initial training, although still critical, will be relatively less important due to the demographics than the focus on those already in the workforce.

NW HEIs support the supplement to the part-time targeted allocation as it is agreed the withdrawal of funding for ELQs could have serious impacts for part-time students particularly those within the older age population for whom education is known to be good for health as well as good for the economy. HEIs would not wish to see any further adverse conditions for part-time students creating more of a gap between those who are eligible for loans and other support and those who are not.

The policies described in this consultation could also have an adverse effect on those who are currently out of work and therefore do not have employers to assist with the cost of provision. This is also particularly relevant to the performing arts sector for which we have two specialist institutions in the North West. The notion of co-funding in the performing arts is unrealistic with the majority of employers already relying substantially on public subsidies.

Overall, NWUA and its members feel that this policy requires further consideration particularly in relation to the Government ambitions relating to the Leitch Review of Skills and the Implementation Plan. Members would also welcome further opportunities to discuss these issues with colleagues from HEFCE or DIUS as the policy develops further. All NW HEIs strongly support the widening participation agenda and increase of funding to support these activities but this must not come at a cost to other important groups of learners such as those studying for ELQs.

If you wish to discuss this response further please contact Keith Burnley, Executive Director, NWUA on 0161 2348880 or kburnley@nwua.ac.uk