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Consultation Document

Support for postgraduate study and part-time engineering, technology or computer science degrees

Date of issue: 3 March 2016

Action required: Responses by 26 May 2016

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Support for postgraduate study and part-time engineering, technology or computer science degrees

- Overview** This consultation seeks views on the proposed changes to support for postgraduate study and certain part-time STEM degrees.
- How to respond** Responses to this consultation should be e-mailed/posted to the address below by **26 May 2016** at the latest.
- Further information and related documents** **Large print, Braille and alternative language versions of this document are available on request.**
The consultation documents can be accessed from the Welsh Government's website at www.gov.wales/consultations
- Contact details** For further information:
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- Data protection** How the views and information you give us will be used

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see

information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

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What are the main issues?

1. This consultation is about the provision of financial support to students taking:

- postgraduate courses; and
- undergraduate part-time courses.

2. The Welsh Ministers intend to make support available to students ordinarily resident in Wales¹ who are taking postgraduate courses, and are seeking views on an interim policy. *The Independent Review of Higher Education Funding and Student Finance Arrangements*², chaired by Professor Sir Ian Diamond ('the Diamond review'), is due to report in 2016 and will include consideration of support for postgraduate study. The Welsh Ministers will not pre-empt the outcome of the Diamond review but intend to develop an interim policy.

3. Students with an undergraduate degree are not normally eligible for support to undertake further undergraduate study, so that support for those who do not have a first degree can be prioritised. However, the Welsh Ministers are considering introducing an exemption for those who wish to study part-time for a degree in a Science, Technology, Engineering or Mathematics (STEM) subject. This would assist in developing an improved skills base in industries reliant on STEM skills.

4. The Welsh Ministers make changes to student support on an annual basis and these are not the only changes to student support being considered for the 2017/18 academic year. Further consultation may be undertaken.

5. Support for postgraduate study is dealt with in section A and for part-time STEM degrees in Section B.

6. This document discusses these issues and seeks your views. The deadline for response is 26 May 2016.

¹ This document refers to 'students ordinarily resident in Wales' which is the term used in the regulations governing student support (The Education (Student Support) (Wales) Regulations 2015). Some statistics use the term 'Wales domiciled students', as this is the term used in the source.

² <http://gov.wales/topics/educationandskills/highereducation/review-of-he-funding-and-student-finance-arrangements/?lang=en>

A. Support for postgraduate study

Where are we now?

7. There are 16,200 Wales domiciled students studying for postgraduate qualifications at UK HEIs (table 1). The majority, 83%, are taking taught courses. Female students substantially outnumber males, despite there being fewer females undertaking postgraduate research degrees.

Table 1

Postgraduate enrolments of Wales domiciled students at UK HEIs, 2013/14.

Postgraduate Research			
	Male	Female	Total
Full-time	945	800	1,745
Part-time and other	530	525	1,055
Total	1,475	1,320	2,800

Postgraduate Taught			
	Male	Female	Total
Full-time	1,680	2,630	4,310
Part-time and other	3,350	5,730	9,085
Total	5,035	8,360	13,400

Total	6,510	9,680	16,200
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Source: 'HE enrolments of Wales domiciled students at UK HEIs by level, mode, gender and age'. Stats Wales. Figures rounded to nearest 5.

8. The numbers of Wales domiciled students undertaking postgraduate degrees has varied little over the last five years (figure 1). The Department for Business, Innovation and Skills reports that postgraduate enrolments by English (and EU) students fell by 17% in the three years after 2010/11³, a situation which does not appear to have been replicated among Wales domiciled students.

³ *Consultation on support for postgraduate study*, p.9. Department for Business, Innovation and Skills, 2015.

Figure 1

Postgraduate enrolments of Wales domiciled students at UK HEIs, 2009/10–2013/14.

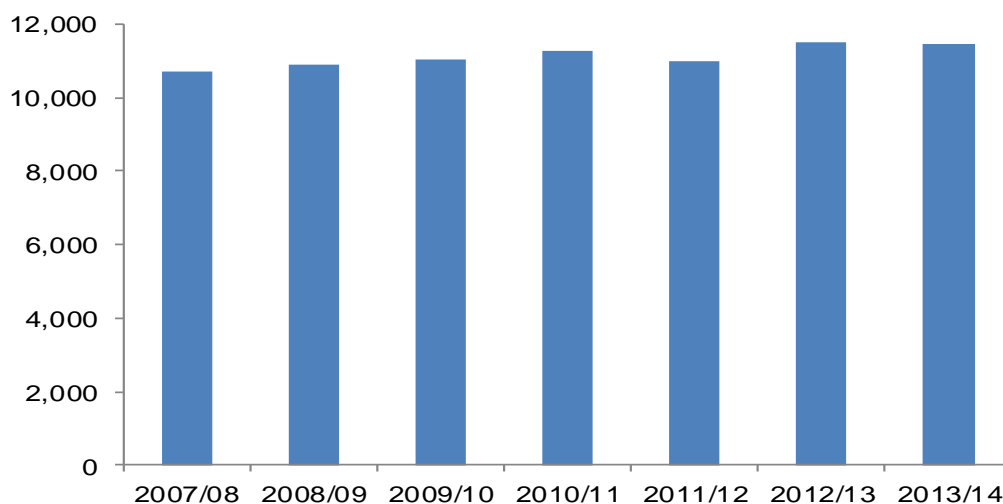


Source: 'HE enrolments of Wales domiciled students at UK HEIs by level, mode, gender and age'. Stats Wales.

9. The number of Wales domiciled postgraduate students at Welsh HEIs has been fairly stable between 2007/08 and 2013/14 (figure 2). There were 11,465 Wales domiciled postgraduate students at Welsh HEIs in 2013/14.

Figure 2

Postgraduate enrolments of Wales domiciled students at Welsh HEIs, 2007/08–2013/14.



Source: 'Higher education enrolments at Welsh HEIs by domicile, year and mode'. Stats Wales.

10. Wales domiciled postgraduate students are the single largest group at Welsh HEIs (table 2). Students from Asian countries are the second largest group, with those from England third.

Table 2

Postgraduate enrolments at Welsh HEIs by country of origin, 2013/14.

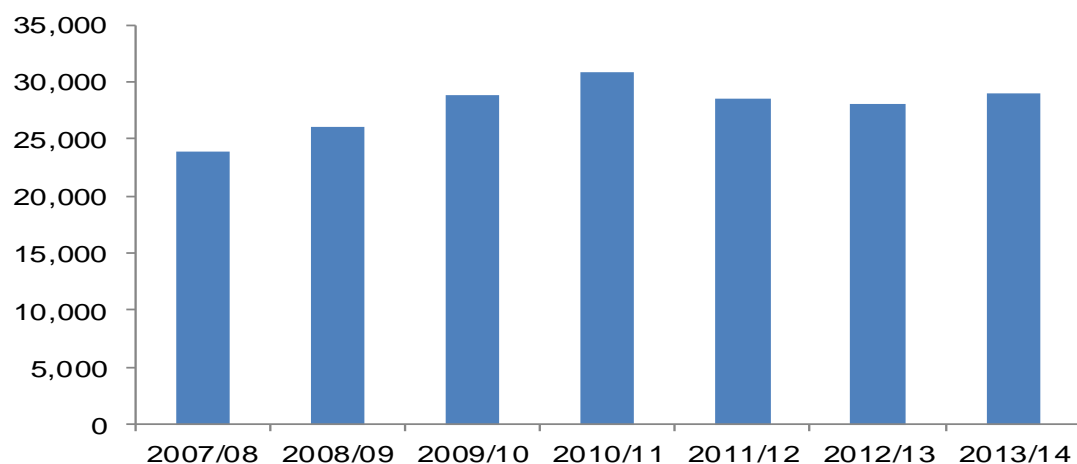
		%
Wales	11,465	39.5
England	4,925	17.0
Scotland	200	0.7
Northern Ireland	100	0.3
Other UK	25	0.1
United Kingdom	16,715	57.6
Other EU	1,655	5.7
Other Europe	340	1.2
Africa	1,850	6.4
Asia	6,630	22.9
Australasia	85	0.3
Middle East	1,105	3.8
North America	530	1.8
South America	90	0.3
Non-EU unknown	-	-
Total	28,995	100

Source: 'Higher education enrolments at Welsh HEIs by domicile, year and mode'. Stats Wales. Figures rounded to nearest 5.

11. Total postgraduate enrolments at Welsh HEIs have fallen from a recent peak in 2010/11 but are higher than they were in 2007/08 (figure 3).

Figure 3

Postgraduate enrolments at Welsh HEIs, 2007/08–2013/14.

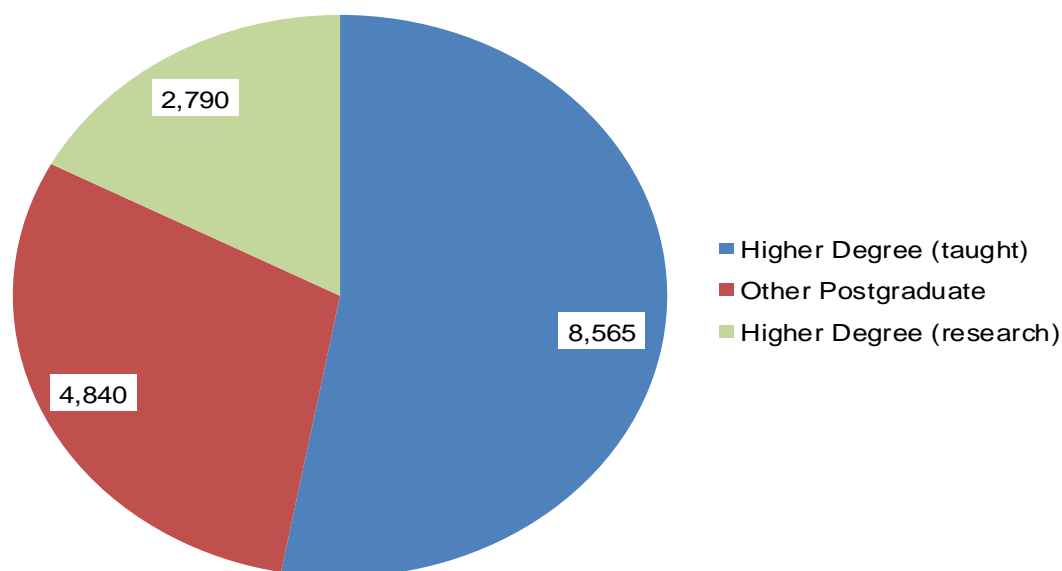


Source: 'Higher education enrolments at Welsh HEIs by domicile, year and mode'. Stats Wales.

12. Taught Masters degrees account for around 53% of enrolments by Wales domiciled postgraduate students, and research degrees a further 17% (figure 4).

Figure 4

Postgraduate enrolments of Wales domiciled students by level, 2013/14



Source: Higher Education Statistics Agency

13. Sixty-six percent of all postgraduate enrolments at Welsh HEIs in 2013/14 were for taught masters, and a further 16% enrolled for research degrees. There were 6,030 Wales domiciled students studying taught Masters, 1,820 studying for research degrees and 3,255 studying for other postgraduate qualifications at Welsh HEIs at that time⁴.

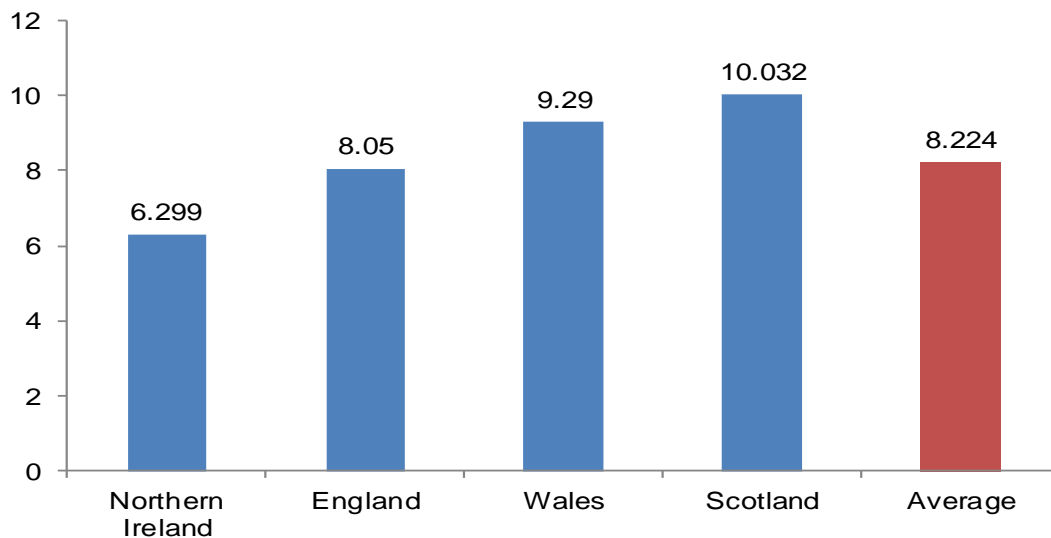
14. The Department for Employment and Learning of the Northern Ireland Government calculated postgraduate enrolments per 1,000 of the population⁵. The results show that Wales domiciled students are more likely to undertake postgraduate study than the UK average (figure 5).

⁴ Source: Higher Education Statistics Agency

⁵ *Consultation on part-time and postgraduate student finance*. Department for Employment and Learning, 2014.

Figure 5

Postgraduate enrolments per 1,000 of the population, 2013.



Source: *Consultation on part-time and postgraduate student finance*, p.48. Department for Employment and Learning, 2014.

Support for postgraduate study

15. The Welsh Ministers make financial support available to undergraduate students in the form of grants and loans to enable them to i) meet the cost of fees charged by providers of higher education and ii) help meet living expenses. The Welsh Ministers make only limited support available to students undertaking a postgraduate course of study currently:

- Disabled Students Allowance provides eligible students with support for their particular needs; and
- students on postgraduate teacher training courses may be eligible for support.

The case for change

16. Making support available for undergraduate study has been the main policy priority for each of the UK administrations. Support is made available to ensure that those who are qualified by ability and attainment may access higher education, and that individual economic circumstance is not a barrier.

17. There has, however, been increasing recognition of the importance of higher level skills to the economy and, therefore, of postgraduate study. In addition, there is some evidence that the absence of support for postgraduate study may be limiting social mobility.

Economic and social considerations

18. Economic and labour market forecasts and analysis show that the proportion of those in work with postgraduate qualifications is expected to continue to rise. It is unclear how much of this may be due to supply effects (as individuals pursue postgraduate qualifications) or demand effects (as the skills required within occupations shift to ever higher levels) but the overall trend is clear. The UK Commission for Employment and Skills forecasts there will be some 4.7m individuals with postgraduate qualifications employed in the UK by 2022, compared to 3.0m in 2012 – a growth of 56%⁶. Around 14% of the employed workforce in Wales is expected to hold a postgraduate qualification by 2020⁷, similar to England (15%) and higher than either Scotland or Northern Ireland (12% and 11% respectively). Postgraduates enjoy an earnings premium over those with undergraduate degrees (9.4% for Masters and 16.2% for Doctorates⁸).

19. There is some evidence that postgraduate education is linked to income. As Machin and Murphy note⁹:

‘A good undergraduate degree is the gateway to a Masters or PhD course, which these figures show will generate significant extra lifetime earnings compared with single degree-holders. Currently these rewards are mainly benefitting those already from prosperous backgrounds.’

20. They further note that ‘a lack of financial support at the time of postgraduate entry may be starting to deter those from poorer backgrounds from further study’¹⁰. Subsequent research by Lindley and Machin¹¹ suggests that social mobility is hampered by the link between existing wealth and the acquisition of postgraduate qualifications. Breaking this link may assist in improving social mobility.

21. The Department for Business, Innovation and Skills undertook research¹² to assess, among other things, the barriers faced by students to undertake postgraduate study. Lack of sufficient funding was cited by 34% of all respondents, rising to 41% among those aged 25 years or younger.

⁶ *Working Futures 2012-2022 Evidence Report 83*. UK Commission for Employment and Skills, 2014.

⁷ *Working Futures Report for Wales*. UK Commission for Employment and Skills, 2012.

⁸ *BIS research paper 45. The returns to higher education qualifications*. Department for Business, Innovation and Skills, 2011.

⁹ *The social composition and future earnings of postgraduates*, p.13. The Sutton Trust, 2010.

¹⁰ The Sutton Trust, 2010.

¹¹ *The postgraduate premium: revisiting trends in social mobility and educational inequalities in Britain and America*. The Sutton Trust, 2013.

¹² *Higher education. Annex 5: evidence related to age eligibility criteria*. Department for Business, Innovation and Skills, 2015.

The Diamond review

22. The Minister for Education and Skills announced on 18 November 2013 that Professor Sir Ian Diamond, Vice Chancellor of Aberdeen University, had agreed to chair a review of higher education funding and student finance arrangements in Wales. Recognising the increasing importance of postgraduate study, Professor Diamond has been asked, among other things, to review the promotion of postgraduate learning opportunities in Wales and for students ordinarily resident in Wales.

23. Professor Diamond is due to report later in 2016. The Welsh Ministers will not pre-empt the outcomes of the Diamond review. An interim report has been published by Professor Diamond¹³, summarising the evidence presented to the review and describing a number of emerging 'themes'. On the subject of postgraduate provision (p.102–105), the report notes three themes:

- Concern that investment in postgraduate provision has fallen behind the rest of the UK and threatens to damage the sector and impact economic performance.
- Concern about the loss of funding for full-time postgraduate students from 2014/15.
- A belief that Wales is at a comparative disadvantage in that it faces significant challenge in attracting postgraduate students in the future if it does not improve access to student finance due to the competition it will face from funding schemes in other parts of the UK.

The Well-being of Future Generations Act 2015

24. The purpose of the Well-being of Future Generations (Wales) Act 2015 is to improve the social, economic, environmental and cultural well-being of Wales. It becomes law in April 2016 and places duties on the Welsh Government (and other public bodies). Support for postgraduate study will contribute to two of its seven well-being goals, 'a prosperous Wales' and 'a more equal Wales'.

25. The goal of a prosperous Wales describes 'an innovative, productive' society 'which develops a skilled and well-educated population'. Investment in postgraduate education would directly contribute to this goal.

¹³ *Review of higher education funding and student finance arrangements in Wales. Interim report.* <http://gov.wales/docs/dcells/publications/151215-review-of-higher-education-funding-and-student-finance-arrangements-in-wales-interim-report-en.pdf>.

26. The goal of a more equal Wales envisages ‘a society that enables people to fulfil their potential no matter what their background or circumstances’. Providing support for postgraduate study would assist in achieving this goal, enabling those who would otherwise be unable due to their financial circumstances to pursue postgraduate study.

27. Further, a yet more highly educated and skilled population may also generate additional social benefits (‘externalities’) which would underpin the achievement of the other well-being goals¹⁴.

Summary: the case for change

28. The evidence on the increasing economic importance of postgraduate qualifications, the link between wealth, existing postgraduate study and social mobility, and the early comment from the Diamond review of the relative situation of support in Wales versus England provide a convincing rationale for the provision of financial support. Such provision can support the achievement of the well-being goals of the Well-being of Future Generations Act 2015.

Our proposal

An interim policy

29. As the Diamond review is ongoing, the Welsh Ministers intend to develop an interim policy, which will be reviewed in due course. The policy would support students beginning their postgraduate study in the 2017/18 academic year.

Objectives

30. An interim policy for postgraduate support should:

- help break the link between income and postgraduate education;
- increase the number of people studying for postgraduate qualifications;
and

¹⁴ The private economic returns (via increased earnings) to postgraduate study are reasonably well-understood (see, for example, *The returns to higher education qualifications. BIS research paper number 45*, Department for Business, Innovation and Skills, 2011). The social returns to higher education have been the subject of academic research for some time. The literature on the social returns to postgraduate study specifically appears to be less well developed.

- be straightforward to implement and operate.

The policy

31. The proposed policy is very similar to that to be operated in England. The features of the policy are listed in table 3. The key features are discussed below.

32. The policy intention is to enable students who would usually be eligible for undergraduate support to be eligible for postgraduate support, to ensure consistency in policy and continuity for the student. Individuals that may be eligible include those that are settled in the UK and ordinarily resident in Wales; an EU national or family member of an EU national; or if they have the residency status of refugee, humanitarian protection; EEA migrant worker; child of a Swiss national; or child of a Turkish worker. The residency criteria may mirror those for undergraduate support¹⁵. Support would be provided in the form of a £10,000 loan. This would be used by the student to support their studies.

33. Postgraduate courses will have to be designated by the Welsh Ministers if students are to be eligible for support. The policy underpinning the designation of undergraduate courses for student support differs in England and Wales, and the designation of postgraduate courses will also be different. Higher education providers based in Wales will have to be charities and have degree awarding powers in order that students on their postgraduate courses may be eligible for support. Postgraduate courses offered by ‘authority funded’¹⁶ providers in England will be designated and similar provision will be made for courses in Northern Ireland and Scotland. The intention is to ensure that students have a wide choice of postgraduate provision and that providers are adequately regulated and act for the public good, principles which underpin the designation of all courses of higher education by the Welsh Ministers.

34. Students would be required to begin repayment of the loan once their income reaches £21,000 per annum (this threshold to be frozen until 2021). Loans would be paid concurrently with any outstanding undergraduate debt at a rate of six percent of salary. The interest rate would be the retail price index plus three percent.

35. One key administrative aspect which differs from that operated for the undergraduate support system is the proposal to pay students in three

¹⁵ The Education (Student Support) (Wales) Regulations 2015 (SI 2015/54), as amended, prescribe who may be eligible for support for undergraduate study. See, in particular, Part 2 of Schedule 1.

¹⁶ See the Education (Student Support) (Amendment) Regulations 2014 (SI 2014/2765).

instalments, to enable them to better manage their finances. This is unlikely to have the desired impact unless the provider accepts fee payments in similar instalments.

Table 3

Proposed support for postgraduate study

THE STUDENT

Available to students settled in the UK and ordinarily resident in Wales; EU national or family member of an EU national; with residency status of refugee or humanitarian protection; EEA migrant worker; child of a Swiss national; or child of a Turkish worker.

Up to 60 years of age.

Must not have an equivalent level postgraduate qualification.

THE COURSE

Postgraduate courses offered by providers based in the UK which meet certain designation criteria.

Taught Masters degrees, including 'professional' courses.

Distance learning taught Masters degrees.

Research degrees.

Full time and part time at 50% intensity or greater.

THE LOAN

£10,000 loan to support full time study. The same contribution to research students to be paid in their first year of study.

Paid directly to the student.

Repayment is contingent on income; repayments will begin at £21,000 (with this threshold frozen until 2021).

Paid in three tranches to full time postgraduate students on one year courses.

Split into two (£5,000 per annum) and paid in three tranches each year to full time postgraduate students on two year courses and part time students studying at 50% intensity.

Paid to the student upon confirmation of attendance by the HEI.

Interest charged at RPI +3%.

Repayment at 6% of salary above threshold from April 2019.

Repayments to be made concurrently with any undergraduate debt repayments.

Any outstanding postgraduate debt to be written off thirty years from the date at which interest begins accruing.

Benefits

36. The Welsh Ministers believe that this interim policy:

- removes a key barrier – finance – to postgraduate study;
- will increase the demand for postgraduate education, improving skills at the highest level and promoting social mobility;
- should be straightforward to implement; and
- provides certainty on policy until the Diamond review reports and its longer-term recommendations are considered.

Costs

37. This policy is not without cost:

- there may be an increased cost to the Welsh Government via additional 'RAB' charges¹⁷;
- there will be implementation and recurring administrative costs; and
- students will incur debt, which is likely to be additional to that incurred during undergraduate study.

Fees for postgraduate study

38. Postgraduate fees are not regulated. Undergraduate fees are (for certain persons on certain courses¹⁸). Regulating fees ensures that higher education remains affordable.

39. It is possible that fees for postgraduate study could rise as a result of student support being made available. The Welsh Ministers do not expect to see widespread fee increases but recognise that some courses are

¹⁷ RAB (Resource Accounting and Budgeting) charges predict the 'subsidy that the Government implicitly pays to students through favourable terms connected to student loans' (*Student Loans. Third report of session 2014-15*, p.9. House of Commons Business, Innovation and Skills Committee, July 2014). This includes those loans that are never repaid as well as the fact that the rate of interest charged is lower than the Government's cost of capital.

¹⁸ The Higher Education (Qualifying Courses, Qualifying Persons and Supplementary Provision) (Wales) Regulations 2015 (SI 2015/1484).

significantly more expensive to deliver than others¹⁹. Excessive fee increases may negate the benefits of this policy, by acting to reduce demand. The Welsh Ministers will monitor any unintended consequences of this policy.

Impact

40. The principal impact of this proposal will be to expand the numbers of people studying for and achieving a postgraduate Masters qualification. This will increase the skill level of the workforce and assist in meeting the demand for higher skills.

41. Support for postgraduate study will contribute to two of the seven well-being goals – ‘a prosperous Wales’ and ‘a more equal Wales’ – of the Well-being of Future Generations (Wales) Act 2015.

42. Table 1 showed that there are significantly more females studying for postgraduate qualifications than males. It is unclear why this is the case. The proposed policy is not designed to address this issue. It seems unlikely that the policy could exacerbate this difference, but uptake will be monitored.

Implementation

43. Following consultation and any changes we make to this proposal, we intend to implement new arrangements for the 2017/18 academic year. Subordinate legislation will be required and we anticipate laying draft regulations before the National Assembly for Wales early in 2017 with a view to enabling applications for support to be made to the Student Loans Company in a similar timescale to that which operates for undergraduate support.

Our questions

- 1 Do you agree that support should be provided for postgraduate study?
- 2 Do you agree with the support package as outlined? Is there any aspect you would change? Why?
- 3 Do you think any particular groups would be disadvantaged by this policy?

¹⁹ A review of the cost of postgraduate taught provision. KPMG, 2014.

B. Previous study and support for part-time study

Where are we now?

44. Generally, students who hold a UK Honours degree or equivalent are not eligible for financial support for further undergraduate study. This is known as the 'equivalent level qualifications' rule. The long standing rationale for this is that those students have already had access to financial support when undertaking their first degree, either by means of grants and loans, or by means of public funding within the higher education institutions themselves. There are some particular courses which have been made an exception to this rule. These exceptions currently include certain postgraduate courses, such as the Postgraduate Certificate of Education (PGCE), and some more specific undergraduate courses for which an Honours degree is a requirement of entry (for example, graduate entry medical and dental courses). Limited support is available for these courses in certain circumstances.

The case for change

45. In academic year 2015/16 a new exception was introduced to the general rule in England. An eligible student, ordinarily resident in England, who holds an Honours degree from a UK educational institution, and who starts a part-time Honours degree course in engineering, technology or computer science²⁰, can now apply for part-time fee support for the new course.

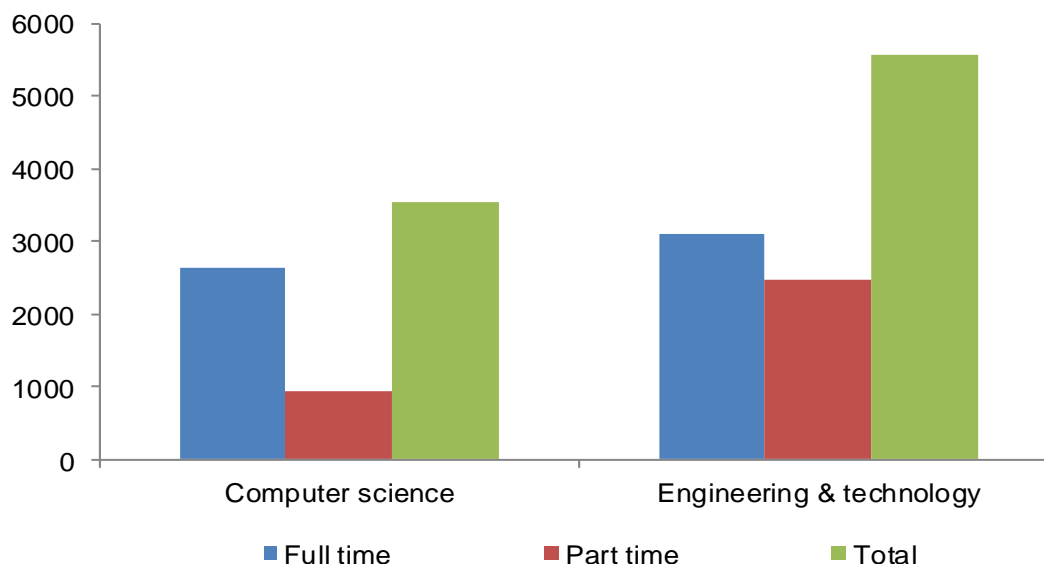
46. Engineering, technology and computer science are viewed as subjects of importance to the economy. Increasing the number of graduates by stimulating the take-up of part-time degree courses may support employers and employment in these industries. Relaxing the previous restriction in respect of part-time study may, in particular, assist those who are employed in these industries but do not have relevant degree level qualifications.

47. The data (figure 6) shows relatively strong take-up of part-time degree courses in engineering and technology, but a somewhat weaker position with regards to computer science.

²⁰ JACS codes beginning H, I and J. See <http://www.hesa.ac.uk/content/view/1787/281/>.

Figure 6

Part-time undergraduate study by Wales domiciled students, 2013/14



Source: 'HE enrolments of Welsh domiciled students at UK HEIs by subject, level and mode of study'. Stats Wales.

The Well-being of Future Generations Act 2015

48. The Well-being of Future Generations (Wales) Act 2015 is designed to improve the social, economic, environmental and cultural well-being of Wales. It becomes law in April 2016 and places certain obligations on the Welsh Government (and other public bodies). Providing support for part-time study in these subjects by those with equivalent level qualifications may contribute to the well-being goal of 'a prosperous Wales'.

49. The goal of a prosperous Wales envisages, among other things, 'a skilled and well-educated population in an economy which generates wealth and provides employment opportunities'. Providing support for part-time study in these technical subjects may assist in ensuring graduates have skills which are in high demand, promoting wealth generation and employment.

Our proposal

50. The Welsh Ministers intend to make a similar exception, commencing in the 2017/18 academic year.

51. Students will have access to fee loans. In addition, students ordinarily resident in Wales may, depending on the level of intensity of their course, be

eligible for a range of targeted grants, as other part-time students are. These include:

- a means tested course grant of up to £1,155;
- a Childcare Grant to cover up to 85% of the childcare costs;
- a means tested Parents Learning Allowance;
- Adults Dependants Grant; and
- Disabled Students Allowances.

52. The first four of these are particular to Wales and are designed to encourage the take-up of part-time higher education by students ordinarily resident in Wales. The current proposal to disregard equivalent level qualifications demonstrates a further commitment by the Welsh Ministers to part-time study.

53. The loans would be repayable under the same terms and conditions as other part-time students, i.e. repayment would commence during the April four years after the start of the course, or the April after the student finishes or leaves the course, whichever comes first. The student's repayments would only begin if their income is over £404 a week, £1,750 a month or £21,000 a year²¹.

54. A full explanation of the current part-time support package can be found in a range of information, advice and guidance which is updated annually by Student Finance Wales²². The Welsh Ministers recognise the Diamond review may make recommendations on the support for science, technology, engineering and mathematics courses (which would include these courses). These will be fully considered at that time, and this policy subsequently reviewed.

Impact

55. The need for more people to be qualified in these subjects in order to strengthen the Welsh economy has been recognised and documented. This policy is not expected to cause a dramatic shift in study habits. However, for those students who may be considering re-entering higher education on a part-time basis, this change may remove at least some of the financial barriers they currently face. In addition it may reasonably be expected to contribute to

²¹ http://www.studentfinancewales.co.uk/media/9179/sfw_repayment_gg_1516_en_d.pdf

²² <http://www.studentfinancewales.co.uk/part-time-students/201516-new-students.aspx>

an increase in retention rates amongst students who may otherwise have found their study to be financially unsustainable.

Implementation

56. Following consultation and any changes we make to this proposal, we intend to implement new arrangements for the 2017/18 academic year. Subordinate legislation is likely to be required and we would anticipate laying draft regulations before the National Assembly for Wales early in 2017.

Our questions

- 4** Do you agree that it is beneficial to extend eligibility to statutory support to students with equivalent level qualifications on these engineering, technology or computer science courses?
- 5** Do you think any particular groups would be disadvantaged by this policy?
- 6** Are there any other courses you believe should be considered for future inclusion in this scheme?