

Support for foundation years

Annex: List of respondents

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WGFY001

Name - Maggie Griffiths

Organisation - Grwp Llandrillo Menai

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Agree

Supporting comments

GLLM agrees with the analysis as we are unable to identify any student benefit that cannot be matched or exceeded by FE provision in terms of the widening access and equality of opportunity agendas.

For example, learners doing an Access to HE course do not pay fees in Wales and do not therefore accrue debt at this level.

Question 2 – Which of the four proposals do you think should be implemented? Why?

d) Cease support for the foundation year.

The arguments for ceasing this support are well documented in the paper.

Where there may potentially be demands for priority subjects (e.g. STEM) and associated means of conversion, there could be a steer to FE that widening participation at Level 3 (and below) are priorities (e.g. in the Minister's letter). FE is quick to respond to such drivers, and can focus on increasing provision in priority subjects.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

Yes

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

Impact could be negated as long as there is clear communication to all potential beneficiaries and stakeholders of the FE alternatives. All entrants would be potentially funded for FE Access to HE programmes (as a much cheaper and more effective alternative for the Welsh Government).

Currently HEI foundation year learners may in some institutes be benefitting from HEI accommodation etc: However they would be able to study Access to HE at a local college without a need for associated accommodation.

Access courses make arrangements for learners to sit essential qualifications while doing the Access course e.g. GCSE Maths/English for nursing/teaching. FE colleges have the critical mass to do this, so again would ensure that Access to HE learners are fully qualified and equipped for their subsequent undergraduate progression.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Some HEIs are currently taking learners in to foundation years: These learners are being taken from the FE (cheaper) sector. FE Access to HE courses are a proven and quality product that work and provide value for money for all.

WGFY002

Name - Simon Murray

Organisation - Cardiff West Communities First

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Agree

Supporting comments

Having been a student for a combination of twelve years of my life I appreciate how valuable free, accessible and credible education is. Within the work I undertake in Cardiff West I encourage people of all ages to return to education as it is one of the most singularly important factors lifting people out of poverty.

Education and training are fundamental in increasing people life chances otherwise they are limited to low paid, insecure jobs with little or no prospect of that changing over the course of their lives.

Question 2 – Which of the four proposals do you think should be implemented? Why?

Option B

I would go as far as to provide no fees and maintenance support for the foundation support.

Having this for some subjects and not others means reducing choice and it is more likely that it would be subjects like art, design and the creative industries would suffer as they are considered less commercially viable and would be dropped first.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

Yes, I work with many people who may not have done well in school but later in life decide they want to develop their own skills by committing to further education and know how important these foundation level courses are.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

If support were ceased for these courses it would result in a situation where going to university would be the reserve of the white middle classes or overseas students who can afford to study in the UK.

I think the statistic for Cardiff West is 98% of the population will not go to university or college which means that these opportunities are so important to the community. I think all types of people take these courses but we would encourage people who need that first step, those who need to understand they can achieve and that all people are capable of academic attainment.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Could we go back to full grants, affordable accommodation and cheap student union bars like in the good old days please?

WGFY003

Name – Dean Jones

Organisation - Ace/Community First Ely

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

Supporting comments

I feel that in cases where student do not have the confidence in their educational ability or standard the foundation year will be very useful to them in determining if they are sufficiently equipped to undertake the following years study.

It will also weed out the people who are not sufficiently motivated and cause less problems throughout the ensuing course and raise the pass levels.

Question 2 – Which of the four proposals do you think should be implemented? Why?

A. Do nothing

This Proposal allows access to all the people who require it.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

Yes

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

I believe that the access would be considerably limited.

The groups I feel that will be most disadvantaged would be the lower / no income families who would not be in a financial position to attend or support their children to attend the courses.

This would particularly be the case in areas of deprivation.

WGFY004

Name - Stefan Kelly

Organisation - Cardiff Met Students Union

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

Supporting comments

When taking the 'poor value for money' stance it appears that the cost for this level of attainment is the only focus. When entering a foundation course students are not only paying to gain the qualifications to progress onto an undergraduate course, but the full student experience that comes with it;

- Providing students' with academic confidence
- Building relationships with academic staff
- Become accustomed to the environment they will continue to study – larger lectures, study habits, style of written work

Furthermore, as foundation courses are taught in a University environment students are accessing HE resources; facilities, library resources, access to research and support staff, Students' Unions. The use of these extensive resources is good value for money.

Question 2 – Which of the four proposals do you think should be implemented? Why?

A - Funding to continue for foundation students.

The transition to University is a big one. For those studying an access to HE course in FE, not only do they have to go through the transition of returning to study, but also a further transition onto University when the FE course is complete. Foundation courses allow students to enter straight into an environment that will allow them to not only raise their attainment to enter HE, but to settle themselves into an environment in which they will continue over the next 4 years. They can build relationships with academic staff, experience what it is like to study in HE (larger lectures, gaining study habits, develop the style of written work eg. referencing). It can also help students develop the academic confidence they need to progress in further education.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

We agree that the points covered in paragraph 30 would capture the type of provision discussed; attainment of student, level of provision and additional period of study.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

I hope the foundation course does not get cut because it would restrict people access to higher education – James Corckery, foundation student at Cardiff Met

The foundation course is a valuable stepping stone for many students. Cutting funding reduces the flexibility of pathways students can take to access HE. This will be an impact on a number of groups including students from disadvantaged backgrounds and those with disability.

For students with disability, a foundation course allows them to explore University life and build the confidence to know they can cope in both in the physical University environment and with the academic skills needed to be successful on an undergraduate course. We spoke to a student with Dyslexia and Asperger's Syndrome who underwent the foundation course at Cardiff Met who stated;
It has helped me realise that i can cope with the stress of university life and given me more confidence to complete a three year degree. If the university did not have a foundation course i would not be here.

For those from disadvantaged backgrounds and those with families (tending to be entering as mature students), the funding offered for foundation courses opens up the doors into HE. As there is no financial provision available for those studying full time in FE the majority of students wanting to raise their attainment are likely to have to undertake study part time and work full time to support themselves. Having to undertake part time study then extends the length of time it will take for them to reach the level of attainment needed for study HE. This will have a definite impact on the decision of those returning to education for many students

To expand on another group of students from disadvantaged backgrounds, those who have not been successful in a 'school' environment can benefit from the environment in which foundation courses are taught. The FE route will be unsuitable for them as they feel they cannot thrive in that particular environment. Entering a foundation course will allow them to access their potential in a structure that better suits their needs;

After moving countries and therefore schools I didn't do as well as I hoped to do in my A-levels. Thanks to the foundation programme I was still able to do what I wanted which was attend university and then go onto the course that I wanted by using the foundation year as a gateway – Elliot Webster, studying International Business Management year 1, accessed via a foundation course

To close, our School of Management Representative who entered University via a foundation course wrote;

The idea of potentially removing funding for the foundation courses at University will predominantly affect those from more disadvantaged backgrounds as it tends to be those people who do not have either the exam results required for direct entry or the confidence to revisit education. Many of the people in my cohort on the foundation course were either people who had not really fitted in at school or the way education is taught or had been unemployed since leaving school so lacked the necessary formal qualifications to gain entry through the traditional route, or were just like me mature people looking to change and improve their future life choices.

WGFY005

Name - Anonymous

Organisation – Anonymous

General comments

Wishes for response to be kept anonymous.

WGFY006

Name: Anonymous

Organisation – Anonymous

General comments

Wishes for response to be kept anonymous.

WGFY007

Name - Philip Davies

Organisation - St. Cyres School, Penarth

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

Supporting comments

I disagree with this analysis. The Foundation Year at in Higher Education offers several benefits for students as well as value for money.

Current FYP offers an alternative pathway for students who, often through no fault of their own (eg absence due to illness, bereavement, re-location etc), do not succeed in reaching the required standard for Year One undergraduate study. Repeating A levels is rarely the best way forward, and pupils who have left this school and gone on to Foundation years have responded very well to the new university environment, whereas to repeat Year 13 would have left them to stagnate as their friends move on. Those in difficult family circumstances respond particularly well to moving away from the difficult environment which contributed to their underachievement in the first place.

The FY also provides an effective pathway for those who have left school some time ago.

Students also benefit from developing higher order academic skills in a university environment, an environment which promotes independence, confidence and a positive approach to life-long learning. Students at 18/19 are ready to move on to a new and challenging environment from a place where some of them have been for seven or eight years.

The consultation document fails to evaluate the whole cost, for example the loss of foundation study provision possibly leading to inability to continue to offer high-cost courses in vital areas such as STEM subjects. Some people are unable or inhibited from accessing HE should foundation study be removed from universities. If the approach stated in the consultation document is taken through, I would advise my pupils to study a course at an English university.

Question 2 – Which of the four proposals do you think should be implemented? Why?

Option 1 – Status Quo.

There is sufficient evidence to suggest that the current approach provides many benefits to students, and prepares them well for HE study.

In addition the application process ensures a guaranteed place on the Y1 course upon successful completion of the FY, and ensures a seamless progression. By applying through UCAS the student is completing the same tasks as their counterparts in the same year. The application process is in itself a higher-order academic exercise, whereas college applications do not have the same rigour.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

No.

The consultation document seems to fail to recognise the diverse provision within FY schemes. This being the case, there is a danger that changes will be badly targeted which may well result in unforeseen and undesirable outcomes.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

There would be a distinctly negative impact on Widening Access.

There will be a marked negative impact on students without a family background of higher education. It is a known fact that the drop-out rate on courses with a foundation year is significantly lower than in traditional Y1 courses.

The 'grown up' atmosphere of a university is a big draw. My pupils would not wish to move from this school to go to a college to do a foundation course.

WGFY008

Name – Liz Hayes

Organisation - Cardiff Metropolitan University (Personal Capacity)

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

Supporting comments

I am the Programme Director of the Foundation Year in Social Sciences, although I am responding in a personal capacity. I understand Cardiff Met is also responding formally as an institution.

The Foundation in Social Sciences at Cardiff Metropolitan University is a preparation year for students who want to continue to one of our Social Sciences programmes – Psychology, Health and Social Care, Housing, Social Work, Youth and Community Work. Around 70-80% of our students do continue, and they are as successful on their degree programmes as those recruited directly. Unlike an FE Access to HE course, or a School Sixth Form course the Foundation Year is a university course – students attend large lectures, given by research-active academic staff, they are expected to develop the study habits of a university student and follow academic conventions in their written work. Our stated aims are for them to learn to be university students – to be confident, independent, lifetime learners and to gain the foundation knowledge and understanding appropriate for their chosen pathway degree. And we want these things, regardless of their starting points – school, college, Outreach (our Widening Access initiatives), full time parenting, employment or unemployment. We would also like the students to feel that they have a full experience of university – that they are included in all the life of the university. Of course we provide a great deal of support to enable this to happen, but the context is totally different from that of a school or college with its much smaller classes, and more ‘contained’ atmosphere.

This course has an intake of around 80 students. Around two thirds are from Wales, with the others coming from England, elsewhere in the EU and countries as far apart as Russia, India and Australia. Our students are a diverse group, tending to be older, more likely to be disabled, more likely to be from a minority ethnic group, and more likely to be from a Communities First or other low participation neighbourhood.

- The majority of our students are school/college leavers who for various reasons did not obtain the qualifications needed for their chosen HE course. For example this year I have a student who did badly in her A levels because of illness, and another because (in her own words) she just didn't put the work in. Both felt that repeating their A levels at school or a local college would be repeating a bad experience and would have the same poor outcome – they were ready to leave home and start 'growing up'. Both are now succeeding.

- A second group is students who left school/college a few years ago, so have work experience and some qualifications, but have decided on a change of direction so cannot proceed directly to their chosen degree. My student example here is a young man who left school, with A levels in a subject he felt that he had lost interest in. He got a job supporting people with learning difficulties, and found his passion. After a few years he realised that he could not progress without a degree, but his A levels were not relevant to the degree he needed. Now he is on his way to a career in his chosen field.
- The final (and growing) group are students who have engaged with one or more of our Widening Access or Outreach programmes. I could give you many, many examples from this group, from first generation refugees to the woman (with no qualifications at all) who last year was working behind the till in our canteen, and is now confidently proceeding towards a degree which I expect her to pass with flying colours.

The key question is whether Welsh Government resources are best used to help these students through a Foundation Year or through other kinds of (presumably cheaper) provision.

My calculation is that support for Foundation Year students represents just under 1% of total student financial support in Wales – less if other Foundation Years have the same proportion of non-Welsh domiciled students as my course. Looking at the three types of students described above – does this represent value for money?

- The younger students I describe are the most likely to come from outside Wales. There are more Foundation Year programmes here than elsewhere, so we are bringing in students from England and overseas, and bringing income into the university and the country. In 2014, Experian, using ONS data, estimated that each student is worth, on average £11,000 to a local economy. Cardiff is an attractive student city, and I would argue that we benefit from all the students we attract. Our non-Welsh domiciled students are bringing about £300,000 to the city. They would not come to study in FE. Yes, those students are taking on an extra year of debt, but they are also enabled to take a step into independent adulthood, a step they feel ready to take.

- The students with a few years post-school work experience find a Foundation Year is more appropriate for their circumstances than an FE course for two main reasons. Their maturity and qualifications may make FE feel like a step backwards, and significantly, although FE is free to students, it doesn't come with any student financial support. Most of these students would have no method of keeping themselves while they study, without a student loan. Of course, if they are lucky, there might be part time, evening classes at a college they can get to, so they can carry on working – but we are offering a way to get the qualification they need in a much shorter time.
- The financial support argument also applies to the final group. Many of these students are claiming benefits, or are in very low paid work. They can afford to study because they can get student financial support. Many (if not all) FE

Access to HE courses are considered 'full time' meaning that unemployed students aren't able to claim benefits whilst studying. Our Widening Access courses held in community venues, in low participation areas, are exemplars of how to be inclusive, draw in resources from partners like Housing Associations, and to raise aspirations. There was actually a waiting list for our accredited Psychology course which started this month in Ely. This seems to me to be the very definition of 'value for money'. Students who pass this course are eligible for the Foundation Year.

- Yes, the Welsh Government is subsidising these students to the tune of about £6,000 for their Foundation Year, but the returns in the shape of a family off benefits/low pay for the rest of their working lives would seem money well spent. I would be surprised if £6,000 spent any other way would produce the same gains.

Finally, all our students are well prepared to begin their degree, in a way that experience tells me students from similar backgrounds who study at FE are not. For all students, the transition from school/college to university is a difficult one.

Students with the confidence of good A level results and the expectation of going to university find it hard. Our students, especially those from Widening Access find it even harder. The Foundation Year is designed to orient students to university life and study from day one. When they start their degree, they know their way round, have a bunch of friends, and they have an idea of what to expect.

Question 2 – Which of the four proposals do you think should be implemented? Why?

Do nothing and continue to provide fee and maintenance support at the full UG rate.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

In my opinion, Foundation Years offer an excellent route to raising attainment for the kinds of students that I describe above. I would not suggest that Foundation Years are the only route, but that without them, a substantial group of potential students will not have the option of university study.

See this short video: <https://youtu.be/vZxI5jwzP04> which gives three students' stories.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

I think that discontinuing support for Foundation Years would be a disaster for Widening Access.

Our student body is extremely diverse – drawing from across Wales, the UK, the EU and the rest of the world. The current cohort has students originating from the USA, India, Poland, Kurdish Turkey, Zimbabwe, the DRC as well as the UK. Some of those students are domiciled in Wales, others are 'International' students. We have a high proportion of mature students, including many parents and single parents, carers, and a higher proportion than the university as a whole of students with disabilities, and mental health difficulties. If they share any characteristics, they would be poor previous experiences of education, and a determination to take the opportunity to improve their future prospects.

For many students the idea that they could study at university was never something they had felt was open to them. Cardiff Met's Outreach programme is specifically tied to our Foundation course, and it offers a route in for students from Communities First and other low participation neighbourhoods. We work in partnership with Communities First, Local Authorities, Housing Associations, Community Hubs and other organisations that will allow us to deliver our courses where people are – and the take up is overwhelming.

This is a particularly challenging group of learners to work with – evidence shows that these are the people most likely to drop out. So we have built the expertise and support systems to enable the majority to succeed.

Whether young people who messed up their A levels, or mature students with no qualifications at all, these are people who are ready to come to university, and the foundation gives them that chance.

WGFY009

Name – Ian Pretty

Organisation – 157 Group

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Agree

Supporting comments

AGREE.

The current arrangements for funding foundation year provision are costly, unaffordable and subsequently unsustainable. Alternative provision exists at FE colleges in Wales. This is delivered by teaching staff who are more than appropriately qualified, and who value and are experts in delivering programmes at this level (level 2/3). Additionally, the cost of delivering this alternative foundation year provision provide significantly better value for money for the public purse (indeed these programmes are mostly already in place, and are now facing competition from costlier, but heavily subsidised HEI alternatives). Furthermore, and importantly, the college options are local to learners, and won't burden them with totally unnecessary debt.

The current arrangements delivered largely by HEIs are also insufficiently engaged with employers nor linked with apprenticeships. This is a fundamental weakness, and undermines the economic value to Wales.

Changing from the current arrangements will have an impact on the income to institutions delivering foundation years "funded" through the HE system, but will have no negative effect on learners. It will just vastly reduce or remove their student loan debt, and provide an opportunity for the Welsh Government to make better use of scarce public money.

Question 2 – Which of the four proposals do you think should be implemented? Why?

We support Option 'd'.

This is the only option that addresses the clear ineffectiveness, unfairness and unsustainability in the current system

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

Yes.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

Some older students may prefer to learn within a similar peer group. This can be addressed through Access to HE programmes in FE colleges.

WGFY010

Name – Anonymous

Organisation – Anonymous

General comments

Wishes for response to be kept anonymous.

WGFY011

Name – Professor Colin Riordan

Organisation – Cardiff University

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

Supporting comments

We strongly disagree with this analysis and provide evidence and arguments below that demonstrate we – and our students – believe that our foundation year provision represents good value for money and provides benefits to the students taking these courses that they would not have if studying in a non-University setting.

Cardiff University has nearly 100 students on either foundation year/preliminary year courses leading to Biochemistry, Biology, Biomedical Sciences, Biotechnology, Chemistry, Dentistry, Ecology, Engineering, Genetics, Medicine, Molecular Biology, Optometry, Physics, and Zoology.

As well as the potential detrimental effects to students with protected characteristic and from under-represented groups (outlined in question 4 below) there are a number of benefits from studying in a University setting which mean we do not agree with the Welsh Government's position.

Supporting STEM undergraduates

- Foundation/preliminary years enable students to change disciplines, ensuring a pipeline of undergraduates in STEM subject areas of strategic importance to Wales. [Evidenced by student feedback and the fact that we accept students with non-science A levels].
- The pipeline of STEM students via the foundation year/preliminary year are very important for recruiting students onto year 1 of the undergraduate course, which help ensure the viability of those undergraduate courses. Without this pipeline, there is increased risk to the sustainability of STEM provision at a world class university in Wales.

Academic preparation delivered and supported by well-qualified staff

- Students are taught on campus, by the same staff who teach in other years of the various degree courses (and are therefore fully aware of the academic preparation that the students need and can tailor learning to the specific needs of the later undergraduate course so that use of time is maximised and they are as well prepared as possible).

- During their preliminary year the students therefore begin to build up key academic relationships, and to form a sense of belonging to their home School, which helps with transition to undergraduate study, retention and attainment*.
- Additionally, students gain valuable practical experience while they study: for example our Engineering foundation year students are introduced to engineering applications of the basic science that they are studying; and our Optometry students are able to get relevant part-time work in holidays. This will help them transition from university into employment.
- Students also benefit from being taught by staff who are research-active and bring this latest knowledge into their teaching.
- Preliminary year students have full access to library facilities and support, which will help with their success and retention.

*Our students' progression rates from preliminary year study to undergraduate study provide evidence that students are well-prepared for academic study. Of the students who undertook the preliminary year in 2014/15, 65% had progressed onto the 1st year of the UG degree at Cardiff in 2015/16 (17% were not at Cardiff University (though they may have progressed to study at other Universities) and 18% were still in the preliminary year in 2015/16, meaning they have been given more time to complete the course).

Pastoral support

The following are available to students on a foundation/preliminary year, which will help their transition into HE and retention of the students:

- Students are allocated a Personal Tutor.
- Students benefit from peer mentoring (mentoring by students in later years of study).
- Students have access to support services such as counselling.
- These are particularly valuable for students who are first in their family to attend HE, who benefit from this HE-specific guidance and support.

Innovative teaching

- Our School of Optometry and Vision Sciences reports that the small group teaching afforded by the preliminary year is an opportunity to deliver teaching using innovative methods that can then be incorporated into the teaching on the undergraduate degree with a relatively quick turnaround. Without the preliminary year acting as a 'proving ground' in this way, innovation in teaching becomes harder to deliver in upper (degree) levels at the same rate. As a result, the School and College would be put at a significant disadvantage when compared against other Universities which offer innovative and student-

led teaching. This could, in turn, result in fewer opportunities for Welsh students to study Optometry in Wales (Cardiff University is the only Optometry School in Wales).

Wider student 'experience'

- Students on a preliminary/foundation year have full access to University 'non-academic' facilities and services (sporting, student societies, social facilities, University crèche etc.) and therefore are receiving a 'university experience' that they would not gain at an FE College.

Student feedback

- We have evidence from annual exit questionnaires and periodic review focus groups that students perceive the benefits of being taught at university during their preliminary year; and that these benefits are an important factor in their choice to apply to Cardiff University.
- We know that students are aware that there are other, cheaper, routes into HE, and they are actively choosing the Preliminary Year in Science because they believe this route is better than the alternatives for meeting their aspirations and therefore that the cost is justified. Students particularly value the fact that – in most of our courses - they can progress straight into Year 1 upon successful completion of the preliminary year, without the need to go through another application process.

Furthermore, Welsh Government has not provided any evidence that students would prefer to study their foundation/preliminary year in a non-university provider.

Question 2 – Which of the four proposals do you think should be implemented? Why?

We believe the WG should undertake policy option A (continue to provide fee and maintenance support at the full undergraduate rate).

As well as the evidence and arguments provided in answer to questions 1 and 4 about the value of the preliminary/foundation year at Cardiff University, here we provide further evidence and justification for the cost of delivery of preliminary years and therefore for allowing students access to student support for foundation/preliminary years as they would for an undergraduate course.

- Fees for our preliminary year programmes are £9,000; the same as a year of an UG degree. These are STEM programmes and students benefit from relatively high contact hours (e.g. in Pharmacy on average contact hours 20 hours per week) and a significant practical component, broadly similar to the UG programmes at Cardiff University.
- Students also benefit from the broader services offered by the university (described in question 1) and their administrative economies of scale in

offering the foundation year at a university where these services are already offered to undergraduates.

- The cost of delivery is therefore similar to delivery of our UG programmes and there would be no justification to charge a lower fee than our undergraduate programme yearly fee.
- It is unclear that a non-university provider would be able to provide the same programmes at a similar or lower cost and still offer the same quality and academic preparation to students that allows them to prepare for study within HE.*
- Some of our courses are specialist disciplines that cannot be taught in a non-university setting, as the facilities required to teach some of the practical aspects course would not be available in a non-university provider.
- Our model of delivery for the Preliminary Year in Science presents economies of scale and keeps additional costs and overheads to a minimum as our academic Schools work together to either deliver some common content where possible.

*We think it would be very challenging for a non-university provider to meet the costs of operating courses in Science or Engineering, and to provide teaching that is tailored to the specific needs of the undergraduate course. There is a risk that on completion at a non-University provider that their experience would not be sufficient to join the undergraduate course at Cardiff University. For example, in Optometry, students must have access to teaching staff that can deliver scientific material in the context of Optometry and it is doubtful that this could be delivered through a non-university provider. While the School could – in theory – work with a non-university provider to deliver some parts of the course, the relatively low demand for a specific optometry foundation course by Welsh students could mean that a foundation course would probably not be financially viable at a non-university provider. If an Optometry specific foundation course is deemed unviable, then this would remove this option for Welsh students, who might then have to apply to go to English universities for optometry courses with foundation years. Furthermore, there are administrative costs for Universities working with non-University providers, which may mean this is not viable.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

We would require more information than is provided in the consultation document which is not very specific to make a judgment.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

Although the number of students on preliminary/foundation years are relatively small, our records suggests that Cardiff's preliminary/foundation year students may be more likely to be mature students, have a disability, be from a non-white ethnic background, and part-time (as compared to our undergraduate first year students).

- There is therefore a risk that there are reduced opportunities to meet the HE aspirations of these students' with protected characteristics/from under-represented groups if foundation year provision is no longer available in universities. Furthermore, these groups of students particularly benefit from the targeted support provided by universities, and as has been described in answer to question 1, which ensures their successful transition into HE.
- Our preliminary year is a route by which we can attract women into scientific courses, which is one of our strategic objectives under our Strategic Equality Plan. Therefore not providing this route could hinder our ability to meet our Strategic Objective for people with this protected characteristic. For example, the most recent Pharmacy intake was 83% female vs 63-65% for standard MPharm programme. Another example is our Dentistry course which attracts female applicants that have not completed science-based qualifications so use this as an alternative route.

Foundation/preliminary years remove barriers for under-represented groups

- Preliminary year studies are a useful route for under-represented groups. One example is asylum seekers with settled leave to remain. This group of students are 'home' students, therefore not eligible for our International Foundation programme, but many have left school systems that exit at age 17 with qualifications that aren't sufficient to prepare them for HE or need to upskill to prepare them for UG study. Asking such students to undertake two years of A 'levels or equivalent in FE could be seen as a large barrier when many will have covered similar content in their home countries but only need 'topping up'.
- The preliminary year is attractive to mature students. For example In Pharmacy, we are seeing increasing numbers of enquiries from mature applicants with career-relevant pharmacy experience in supporting technician roles, who are seeking to convert to registered Pharmacist status by pursuing the MPharm. In Optometry we also recruit students who have already gained experience of working in a Optometry setting but may not have the necessary academic qualifications to go straight onto year 1 of the Optometry degree. Therefore without the preliminary year, would be unable to train as an optometrist. Optometry also accepts students from other under-represented backgrounds, for example from the military or industry, on a case-by-case basis.

- Asking mature students with significant experience in the workplace to repeat A levels or undertake Access courses etc. can be demotivating and, for mature entrants who are in work or caring for dependents, they may be limited by the availability of suitable evening classes, and/or alternative support for caring commitments. Furthermore, the ability to access the same financial support that as for other HE students helps these students to overcome financial barriers to converting their qualifications for HE entry.

Students who may have received inadequate advice about subject choice

- With current reductions to schools' career advisory support, there is another widening participating aspect, in that often it is students who have been poorly advised about A 'level subject choices or the utility of less practical-heavy qualifications (e.g. BTECs) for STEM degrees that benefit from an opportunity to upskill on the core science knowledge and practical skills needed for their degree subject of choice. They may already have a high level of attainment in their level 3 qualifications (A 'level equivalent), demonstrating their capability for degree-level study, but lack the specific subject knowledge. Foundation/preliminary year provision can therefore help these students meet their aspirations in STEM subjects.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

The preliminary year route, where a student progresses automatically from 'year 0' into year 1 of an undergraduate course means that students may be more likely to stay in Wales and contribute to the Welsh workforce in areas of national importance (STEM, health etc). There is a risk that if these students had to apply separately for an undergraduate course they would leave Wales to do so.

One of the reasons students choose to enter via a foundation/preliminary year is because they have the wrong subject mix on entry and need to gain the necessary scientific knowledge before proceeding onto an undergraduate course. This can enable us to recruit well-qualified students with excellent 'soft' skills. For example the Foundation Year in Optometry provides an opportunity for students who do not have a science background to study Optometry. This allows us to further promote Cardiff's reputation for excellence in Optometry teaching by tapping a resource of students with the potential to have excellent communication and patient management skills, but do not necessarily have the scientific experience necessary to join the three year degree. The academic standard of the course is high, as it is aimed at applicants who typically have achieved high grades in A-levels (ABB at A2), with a combination of one science or science-allied subject and two arts or other subjects.

WGFY012

Name – Anonymous

Organisation – Anonymous

General comments

Wishes for response to be kept anonymous.

WGFY013

Name – Prof Martin Stringer

Organisation – Swansea University

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

Supporting comments

Swansea University would disagree with this statement as we have found our foundation years to be very successful in helping students enter HE and in particular support strategic imperatives to widen access and increase the numbers of students taking STEM subjects.

The foundation year provision at Swansea University is almost wholly STEM based (Science & Engineering) and provides a useful and valued (by both the students and the institution) opportunity for students to pursue careers that play a significant role in improving the economic performance of the region and Country.

Typically, Swansea has been delivering around 14 to 15 courses with a foundation year and between 2011-12 and 2015-16 total student numbers have grown from 139 to 391 (181%) demonstrating the demand for this type of provision within and outside of Wales.

In terms of Welsh domiciled students there has been a 42% growth (85 – 121) over the same period and on average 50% of these students are from a widening access/participation postcode.

In 2014-15, 91% of foundation year students were retained and successfully moved to year 1.

The foundation year teaches students knowledge and skills required for higher education study and enables students with lower entry tariffs or the wrong combination of entry qualifications to be well prepared for the first year of a degree. Studying A levels or BTEC qualifications leads to different knowledge and skills which support passing those qualifications and do not necessarily prepare students directly for university level study which often requires different skills and knowledge. The benefits of HE foundation years (to students, HE and the economy) far outweigh any concerns and we would argue this provision could not be sufficiently replicated especially in terms of quality and experience at FE level. Benefits include:

- Provides students with the choice to enter and progress to HE without having to go back to an environment in which they may have already failed in the first place.

- Prepares the student far better for a university degree than FE by teaching knowledge and skills at a HE level which will be of relevance and value for the rest of the 3 year degree.
- The key differences are that students are embedded within a high quality research-led environment, being taught by research-active academic staff, in a well-equipped University environment, with an effective tutorial system and pastoral care, alongside students in other years. This environment provides a significant incentive and motivation for students to achieve their potential. Our College of Engineering pointed out 'the fact that students who complete our integrated Foundation Year programmes do far better than students who join with vocational qualifications demonstrates this'.
- Provides students the opportunity to study in their chosen fields despite choosing the wrong A-levels or not achieving the required grades and thereby achieving in one year something that may take a further two years to complete at FE.
- Having to study a further two years at FE may be off-putting to the student and in addition parents may be unable (or unprepared) to continue to financially support them whereas a foundation degree will allow students to become financially independent and enter straight into HE reducing the risk of losing them from HE entirely. This is likely to be of particular importance for students from low income households or looked after children.
- Students joining the Foundation Year programme will not be differentiated from students joining in other years and this will be a significant factor in student choice. Remaining in school for a further year, or joining an FE College will be seen as a less successful route by students, parents, peers and schools. This will act as a disincentive for students who are keen to go into STEM careers who do not have the required entry qualifications.
- A foundation year acts as the vehicle at the start of the student journey through to employment, particularly in STEM areas. At Swansea University this puts a student on a fully accredited course with quality pathways right through to STEM career opportunities.
- There seems to be an assumption that FE Colleges and sixth forms are able to provide the quality of education required to access HE. The recent Wiserd report on Access to Higher Education showed that half the schools in Wales are underperforming compared to the national average for attainment at GCSE.
- Without a foundation year, some students will not pursue higher education and will not reach their potential future careers. A recent survey of foundation year students in the College of Science indicated that if there was no foundation offering at Swansea University:
 - 22% would not have continued with Higher Education,
 - 33% would have gone elsewhere to pursue a 4 year degree and

- only 20% would have attempted A-levels again.
 - Overall, 91% of students agree it was right choice to do foundation year
- In addition, our College of Engineering believe that without their foundation years (or the support for students) a significant number of students would no longer follow a route into an Engineering degree. This would have a major effect on our widening access provision and we would lose a significant number of very successful engineers for the future.

“The UK’s ability to flourish will depend on the capacity of both businesses and employees to continually renew and upgrade STEM skill levels, so support for a more diverse range of routes in to STEM professions is needed” CBI, Engineering Our Future, 2014:4

- Foundation years allow universities to address the widening access and inclusivity agenda - 54% of Welsh domiciled students entering a foundation year in 2015-16 are from disadvantaged areas.
- 91% of our foundation year students in 2014-15 successfully transitioned to Year 1 study.

Hollie Rosier, Foundation Year student, graduated in BEng Aerospace Engineering and now a PhD student:

“I chose Swansea University to do my Foundation Year in Engineering due to its great location and the engineering department in particular is known to have a very high reputation. The foundation year provided me with the ability to pursue an undergraduate engineering course giving me the necessary groundwork to build a future in engineering. It also provided me with an insight into the opportunities within the industry and without it, I wouldn't be here studying for a PhD in Aerospace Materials, which is supported by Rolls-Royce plc and the government (EPSRC).”

Question 2 – Which of the four proposals do you think should be implemented? Why?

- A) Do Nothing – continue to provide fee and maintenance support at the full undergraduate rate
- B) Provide a reduced level of fee and/or maintenance support for the foundation year.
- C) Provide full or reduced support for particular subjects and not for others
- D) Cease support for the foundation year.

The preferred option for Swansea University and we believe for students and the Welsh economy should be:

A) Do Nothing and continue to provide fee and maintenance support at the full undergraduate rate.

The reason for this is the foundation year is clearly supporting our growth in Welsh students taking up STEM degrees and plays a significant role in attracting students from widening access/participation backgrounds. Both these factors are completely aligned to Welsh Government and HEFCW priorities.

Reducing or limiting the current support will present a real danger of:

- Reducing growth in STEM areas and throughput to PhD's
- Reduces Welsh students' choice to undertake the study they desire (not just STEM)
- Reduce the options available for widening access/participation students to enter HE
- Will reduce the number of students entering HE, forcing those that may not have achieved traditional qualifications or attained back into an environment they have been unsuccessful in or even away from FE/HE altogether
- Removal/reducing support will disadvantage the opportunity of Welsh students to undertake a foundation year compared to their English counterparts who can continue to access fee/maintenance support.
- Ultimately limits Welsh institutions from being able to compete with other UK institutions offering foundation years – further adding to the gap between English and Welsh HEIs.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

Paragraph 30. The issue is clear – the cost to the individual and Welsh Government, when compared to the available alternatives, of a period of study used to raise the attainment of an individual to that required to begin a degree programme.

A definition is likely to consider the interaction between:

- the attainment of the student;
- the level of the provision; and
- the additional period of study.

The definition provided ignores the socio-economic background and personal circumstances of the student; these circumstances could make it impossible to continue with (or repeat) FE level study and therefore prevent them from accessing HE at that point in time, i.e. students unable to go back to study in FE due to lack of financial support available may well choose to leave education altogether.

The crux of the issue which is not addressed is that foundation years are not the equivalent of A levels or BTEC. It is a flaw in the qualifications classification system being used.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

Characteristics of Students entering a foundation year in 2015-16 (361 students):

Domicile: Wales 31%, Other UK 54%, Overseas 15%

Gender: Male 81%, Female 19%

Age: Average of 19

Disability: 14%

In terms of widening access/participation, the foundation years are clearly supporting students to access HE. For example in 2015-16 (enrolments):

Over half (54%) of 'Welsh Domiciled' students entering a foundation year come from a disadvantaged area . Over 5 years the average is 50%.

In total 23% of 'Other Home' students entering a foundation year come from a disadvantaged area (as above) or an average of 30% over the last five years.

In order to obtain an 'indicative' comparison with levels of widening access students entering foundation years and those entering Level 1 the following figures were observed based around the HEFCW corporate Strategy widening access and widening participation indicators:

Widening Access of Welsh domiciled students entering level 1 or level 0 (15-16 enrolment figures):

Level 1 – 21.9%

Level 0 – 24%

Widening Participation of all Home students entering level 1 or level 0 (15-16 enrolment figures):

Level 1 – 30.9%

Level 0 - 33.2%

Impact

Ceasing support for the foundation year will have a significant and we feel detrimental impact on students from a widening access background. Our student data clearly shows the foundation year attracts over 50% of Welsh domiciled students from disadvantaged backgrounds. Any reduction or removal of student support could therefore have a significant impact on creating a further barrier to these students entering HE. There is evidence to suggest that students from widening access backgrounds tend to want to stay locally, any changes to the provision for students in Wales risks losing these students from higher education altogether.

In terms of Welsh Government priority areas (determined by HEFCW Corporate Strategy measures) a slightly higher proportion of students in terms of the access and participation metrics enter at level 0 than they do at level 1.

In 2015-16, 14% of foundation year students have a disability compared to 9% at Level 1 (similar figures are also observed for the last three years); suggesting foundation years are important in increasing the proportion of disabled students entering HE. Changes to the policy could therefore limit the options disabled students may have for entering HE.

The alternative to send these students back to FE offers more challenge (as already highlighted in question 1) than removing foundation years support and we feel is not a credible option.

The Foundation Year programmes provide scope for widening access students to experience a different learning environment with fewer barriers and we have many examples where such students have gone on to achieve good degree results and a successful career. These graduates will typically go into Engineering and Science jobs and are the most likely to remain in Wales, to the benefit of the whole economy.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

We would like to make a few specific and general points:

We feel that the note from WISERD quoted in point 16 is not correct. Widening access is not recruitment; the two types of activity are distinct.

We would also argue that there is no evidence given to support the assertions in points 17 and 18 about FE provision (which in some sense has already failed foundation year students) and the idea that additional competition may “destabilise existing Reaching Wider collaboration and partnership arrangements”. There is no evidence that the latter is true and it hasn’t had this effect to date. This is echoed in point 23 with the reference to “unwelcome competition in achieving widening access goals”. We do not know who this would be unwelcome to?

As a more general point in relation to this consultation, foundation year students choose to take on additional student debt. The fact that a fee grant subsidy is payable is a decision made by the Welsh Government (WG) and not by the student. If this decision is being made on the grounds of cost to the WG rather than student choice, then foundation year students should be consulted before any decision is taken.

Again we would like to reiterate the point about competitiveness in the UK sector. The Welsh HEI sector is already underfunded when compared to England, particularly in the area of additional funding for expensive or high-cost subjects – mainly in the STEM areas, where the majority of our foundation year course are focussed.

WGFY014

Name – Prof Maria Hinfelaar

Organisation – Wrexham / Glyndwr

Question 1 – We have outlined a series of concerns regarding foundation year provision principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

Supporting comments

Wrexham Glyndŵr University would first point out that the wording of this question is highly biased and implies that a conclusion has been reached already about the value and benefit of Foundation Years. Thus we have answered this question as if it were to have read; “Please outline to what extent foundation years offered in HE offer value for money and benefits to the students, when compared with alternative routes.” Wrexham Glyndŵr University is of the view that the Foundation Year offers enormous benefits to the students and to society, specifically the cause of widening participation with our evidence demonstrating that Year Zero provision is adding to the overall numbers within higher education.

The University does not agree with the analysis and arguments put forward in the Consultation document concerning value for money and apparent lack of obvious benefit to the student.

In terms of benefit to the student the Consultation Paper itself appears to be limited in its understanding as to the purpose of Foundation Years, hence perhaps leading to an underestimation of the value. Paragraph 5 (page 3) of the Consultation states that; “The first year – year zero – appears to be used to raise the level of attainment of a student...” Year Zero provides significantly more added value than this narrow definition suggests. In particular:

- An opportunity for students to be introduced to a higher education environment and what that both requires of them and provides for them:
- The approaches to learning and ways of learning in terms of level of knowledge and skills, methods of and standards for study and introduction to self-learning;
- Familiarity with higher levels of teaching by staff who are highly qualified and specialist professionals, (currently Wrexham Glyndŵr University has over 60% of its teaching staff who are Fellows of the HEA);
- Research informed teaching;
- Access to specialist facilities such as laboratory space or teaching equipment such as the flight simulator here at Wrexham Glyndŵr University, (where TRAC analysis suggests that the fees in STEM subjects and others are insufficient to cover costs);

- Significant non- academic support that is available for these students who may have higher needs in areas such as disabilities, mental health issues or other welfare related aspects that impact upon students' ability to study. Our professional services infrastructure (student welfare, needs assessments, mentoring, inclusive curriculum) provides particular support for those on Foundation Years.
- A route, otherwise unavailable, into higher education and the employment and salary advantages that it is known this provides, as well as the ability to contribute to the knowledge economy which is a key aim within the Welsh Governments Economic Renewal strategy.
- An accessible and supportive route into higher education for those who may have been disengaged earlier in life with formal education but who have the potential, though not the immediate formal qualifications for entry.
- It is, by design, not a generic access course; rather it is designed as an integrated route and students enrol not with the purpose of securing the Foundation Year (and a Level 3 qualification) but enrol onto a named degree strand (with flexibility to change routes). This clearly distinguishes it from other access provision that other institutions may provide.
- An opportunity for students to reflect upon their choice of subject for learning, with a chance for students to transfer disciplines, supporting the case for Foundation Years not only enabling wider access but also facilitating conversion of subjects (contrary to what is claimed within paragraph 12 of the Consultation)
- There is a particular value in attracting students into STEM areas, with over 41% of Foundation Year students at Wrexham Glyndŵr University in STEM subjects, and for learning in these areas there is especial value in ensuring that students are adequately prepared for the more specialist areas of learning that are frequently required in STEM subjects. It is evident that such exposure to specialist areas of study would not be available through generic access courses offered in FE, as our own students have pointed out to us.

“Foundation year offers samples of each area of study so by the end if you find you like something else better you can change, also by exploring the other areas of study you gain new skills which could help when you go to your course it also eases you into the study with basic knowledge.”

“Reason why I choose the foundation year where I currently am was the great diversity of different subjects there was that I found interesting.”

Wrexham Glyndŵr University Foundation Year Students

In relation to value for money the straight comparison with alternative provision at level 3 is not appropriate. Foundation Years are deliberately provided within a higher education environment in which students benefit from the ways described above, and that are not available through other routes. This includes access to highly skilled

staff, specialist learning and teaching resources and wide ranging non-academic support, which together provide a learning environment and route that is not available outside of higher education.

Foundation Years are not a qualification of themselves, but are the first step in an integrated programme of education leading to a degree and the costs involved reflect the expertise and facilities to which they have access. Whilst most of our students stay with us, we are aware that some of our students, having successfully completed Year 0, transfer to other programmes or other universities, which also promotes wider routes through learning that meet individual student need. Without Year 0 as a stepping stone they would not have achieved this. TRAC analysis already indicates that such provision carries costs that go beyond the fee level, but which bring benefits to the student that are highly valued and that contribute to the student's long term success.

“Superior facilities, tuition, and an environment better suited to students aged 21+.”

“I have attended FE courses at college before, but the environment became draining as it felt like it was geared towards younger students aged 16 - 18.”

Wrexham Glyndŵr University Foundation Year Students

In the value for money debate, the implication would be that what students experience on a University Foundation year is comparable to provision accessible through alternative routes such as FE. Students on the Foundation Year tell us different. For them, the experience has significantly added value and is provision that is more than just accessing higher education, this includes many mature students, who might not have thrived in a typical FE environment. Rather it is about putting them in a position where they can “get the most from higher education” and “giving them the foundations for success” (quoted in paragraph 10 of the Consultation and from Wrexham Glyndŵr University's own website).

There is also a danger in equating “good” with “cheap”. Whilst we support entirely the need to ensure efficient and effective use of public resource and to achieve best value for money, the calculation of “value” has to be considered more comprehensively to take account of the benefits for students outlined. Assessing the value needs to consider the value to Wales of the resultant upskilling within the economy and long term economic gains, not just superficial of comparisons of fee levels for what are different offerings.

Foundation Years offer a valued and unique route into higher education that is the right route for a particular group of students, for whom having this as an additional choice of possible learning routes is vital if they are to take their education to a higher level.

Foundation Years provide choice and the fact that there is positive and increasing take up of this offer indicates that it is meeting student demand within the region, when the alternative routes are well advertised. In other words, Year 0 is complementary to, not competing with existing FE access programmes.

As we will make clear in Section 3, Wrexham Glyndŵr University sees it as a vital part of future learning provision in Wales that both higher and further education not only continue to work collaboratively, but also are supported in the work they are doing with learners to ensure that the widest range of routes into education are open to all. The current diversity of provision is a healthy reflection of how institutions are working to provide varied routes into and through levels of learning that are appropriate for individual circumstances, in a way that allows more students to access and benefit from higher, as well as further learning.

Higher and further education each offer something different; students are choosing what meets their needs; to remove routes once they have been opened up will have a deleterious effect on meeting learning needs in Wales.

The overall benefit and value of the Foundation Year route was explored with a survey of students who have accessed Wrexham Glyndŵr University over recent years. Responses indicated the high value and benefits students ascribed to Foundation years:

- Around 70% of Foundation Year students at Wrexham Glyndŵr University described their experience of being in a University for their Foundation Year as 'valuable'.
- Around 60% of Foundation Year students at Wrexham Glyndŵr stated they would not have entered Higher Education if Foundation Years had not been available
- Over 60% of Foundation Year students at Wrexham Glyndŵr described their Foundation years as a valuable route into and through learning

The survey also provided considerable anecdotal evidence of the positive difference and impact that Foundation Years have made to students, "... I wouldn't have felt comfortable in college and being in Uni made me think I would be more likely to continue education to do a degree, as that's what I'm working towards."

Such quotes from the survey are referenced throughout our response, to illustrate where the value lies.

Question 2 – Which of the four proposals do you think should be implemented? Why?

Wrexham Glyndŵr University supports Option a: "Do nothing – continue to provide fee and maintenance support at the full undergraduate rate."

The alternative options proposed would all have the effect of reducing (completely or significantly) the number of students on Foundation Years which would reduce student choice and remove a route into HE that is both valued highly by students themselves and is not provided elsewhere. Removing this route would lead to a significant net drop of entrants into HE which would not be compensated elsewhere. Foundation Years are distinct from alternative level 3 provision, providing significant benefits to those students that choose this route as being the most appropriate.

There is no evidence that students are confused by what is on offer. Indeed as outlined in answers to question 4 below, with the increased blending of provision to students on the HE/FE boundary comes an increasingly sophisticated ability of

students as consumers to make a choice. Students will pick the learning route best suited to them. Removal of that element of choice would be a retrograde step. The value in maintaining support for Foundation Years is clearly articulated by the Student Guild at Wrexham Glyndŵr University;

“The Guild supports fully the response taken by the University in arguing for the continuation of support for Foundation Year funding in Higher Education. Foundation Years have been a vital route into University study for students who not only would not have been entering higher education but for whom alternative provision was not suitable. What is provided at Wrexham Glyndŵr University really provides students with the sort of teaching, facilities and learning environment and support not available elsewhere. Whilst not suitable for all, for some it is the best or only route and for the Government to remove such choice would be a backward step”

The President of the Student Guild also added:

“One thing with the Foundation years isthose who have not been in a learning environment for some time are a bit apprehensive about coming back into it and from speaking to students they felt that being slightly older, they would not fit in or find it difficult to go back to a ‘just out of school college’ and that with the proportion of Glyndwr students being mature they would be able to settle in better. Students tell me that had it not been for the foundation year that we offered they would not have come back into education because they did not want to go to a FE College as they felt they would not have fitted in.”

Please also refer to answers given to questions 1 and 4 regarding the wider benefits for students and contribution to widening access that come from the provision of Foundation Years, as well as enabling Universities to compete across the UK and attract students into Wales.

Of the other options presented and which we do not support:

- b. Provide a reduced level of fee and/or maintenance support for the foundation year.

This would potentially mean that provision could be offered at well below cost of not offered at all by Universities, thus reducing student choice and access to the benefits of Foundation Year study. Foundation Year study is an integrated part of the degree offer, accessing the same staff and the same facilities for support of the students. There is no case for reducing the available funding for that part of the degree.

- c. Provide full or reduced support for particular subjects and not for others.

We provide the option of Foundation Year Learning across all academic Schools at Wrexham Glyndŵr University, allowing students across all subject disciplines the opportunity to access this route, and all routes offer employment and growth potential within the Welsh economy. The provision is an integrated part of the undergraduate programme offer. It is widely recognised that the standard £9,000 fee does not cover the full cost of undergraduate study across all subject areas.

Universities themselves make choices about the allocation of resources between areas using the full tuition fee income available to them. Imposing differential levels of support across subject areas and levels of study creates confusion and may result in disincentives to students to study those subjects remaining at a higher fee level – the STEM areas – where there is clear priority to grow numbers.

- d. Cease support for the foundation year.

The option would lead universities to remove all provision and deny students a valuable, and valued, route into higher education.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

The wider interpretation within the Consultation defining Foundation Years is confused, (see point 2 in answers to Question 5 below).

With specific reference to paragraph 30 Wrexham Glyndŵr University would disagree that the definition present captures the type of provision discussed:

- It is not clear if the reference to “attainment of the student” is at the point of entry or ultimate achievement
- “level of provision” alone fails to recognise the nature and ways of delivering that provision, and the added value that accessing level 3 provision within an higher education environment provides (as outlined in answers to earlier questions) In addition the definition fails to recognise:
- That the removal of support would remove a route in higher learning and ultimately into graduate level employment and contributors to the knowledge economy, it is removing choice for students;
- The contribution to widening access that Foundation Years make, particularly for those who have to-date achieved lower levels (level 2 and below) of learning for example, and for those who are returning to education and for whom the FE College environment has no appeal;
- The additional value that students receive through their experience within higher education
- The integration of Foundation Year provision with established degree provision

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

The experience of Wrexham Glyndŵr University after 3 years of providing the Foundation Year route is that should support for Foundation Year provision be changed in ways suggested in options b, c and d the impact on widening access would be negative.

Foundation Year provision is an acknowledged part of HE provision and is recognised by our FE partners. As we look to develop our partnership working with

FE, including providing comprehensive choice of varied learning routes that meet the disparate needs of the student population, there will be ways in which we can work even more closely on ensuring that Foundation Years continue to provide a unique and appropriate route. The current availability of such is not inhibiting further collaboration as may be inferred from the Consultation (paragraph 27). Such further collaboration, particularly on less specialist modules where HE and FE could explore models of joint delivery is something that Wrexham Glyndŵr University and its FE partners are keen to explore further.

“I have two children and could not afford to give up work to attend college.”

Wrexham Glyndŵr University Foundation Year Student

Furthermore the WISER Report quoted extensively in the Consultation also lists as one of its key findings (page 3):

“Widening access to higher education involves promoting entry to a wide variety of types of programme. Accordingly, entrants have a diversity of educational experiences.”

It is our view that removing support for Foundation Years would reduce the variety and subsequently the diversity of educational experiences. Another key finding of the same report is that “Higher education students from socially disadvantaged backgrounds are equally likely to attain a ‘good degree’ as those from more advantaged backgrounds.”

Given that Foundation Years promote access from socially disadvantaged background, removal of support for Foundation years would be likely to reduce the numbers of students achieving higher levels of educational attainment in Wales.

The selective references quoted in the Consultation in paragraphs 15 and 16 neglect to refer to the final conclusion of that section in the WISERD report (on page 47) which is that:

“It would seem that the most appropriate way of addressing this underlying tension is to have a national system for widening access to higher education, which is based on a complete and detailed understanding of the issues that it is trying to address...”

Wrexham Glyndŵr would welcome an opportunity to contribute to developing such a “complete and detailed understanding of the issues” before shaping limited policy decisions about but one part of the complex issues of widening access. Additionally (within paragraphs 15 and 16 of the Consultation), reference is made in what can be inferred as a critical manner, to widening access being a part of recruitment because of an increasingly competitive HE environment. This raises the issues that if the Welsh Government wishes for Welsh Universities to be successfully competitive within a UK context then the ability to provide Foundation Years is an important element in ensuring that we can compete. Indeed at Wrexham Glyndŵr an additional 236 students come from outside of Wales over the last 3 years through the Foundation Year route. It would also be unrealistic to expect that those students that do enter through such accessible routes as Foundation Years are not a part of

recruitment and universities' planning, just as any such students that enter either FE or HE institutions are similarly considered.

Part of the widening access agenda over the last decade has been the blurring of traditional HE/FE divides in a way that has increased choice and diversity of learning opportunities to a wider range and increased number of students. The developments have happened in ways that are best suited to individual needs and regional demands. Having such "blended" provision has seen an increase in HE provision through FE to the benefit of students, and there is no evidence that this has "destabilised" (paragraph 17 of the Consultation) existing Wider Access collaboration or partnerships. Foundation Years are part of a wide portfolio of provision to students who have not yet reached level 4 in their learning; students can and do make discerning choices as to the route best suited to meet their needs, which can be academic or do to with their current opportunities. And Foundation years are not generic access routes competing with FE or other providers; they are an integrated route leading to degree.

"I was a carer for two disabled children and couldn't even think about myself and what I wanted out of life the foundation year was excellent for myself being a mature student"

Wrexham Glyndŵr University Foundation Year Student

Two particular aspects of the composition of Foundation Year students that come to Wrexham Glyndŵr University are: Gender; Nationally some 55% of first degree students are female (a pattern replicated at Wrexham Glyndŵr University over the last 3 years). The Foundation Year provision however at Wrexham Glyndŵr University shows that over the last 3 years 67% of those enrolled are male, contributing significantly to improving access from this under-represented (in terms of gender) but often overlooked group.

- Level of educational attainment upon entry. Of all students who have enrolled at the University over the last 3 years on Foundation Year programmes, 24% have had qualifications at Level 2 or below, but have demonstrated the clear potential for higher learning, illustrating what an important route into higher education such provision provides through non- traditional routes for non-traditional students.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

We would like to raise the additional points:

Basic Premise

As identified in the start of our answer to question 1, we find the premise of the questions to be flawed as the underlying analysis and argument from which the questions are drawn to be themselves flawed. Our own data and analysis shows a high level of benefit to students and to the student body in Wales, a conclusion which we understand is replicated across Wales.

Furthermore the resulting questions to which institutions are asked to respond are then biased in their presentation, suggesting that conclusions about value, impact and contribution of Foundation Year support is have been reached without either a proper and inclusive data analysis or initial consultation of providers and students.

Timing

The consultation suggests implementation (paragraph 28) is for the 2017/18 academic year.

Marketing and recruitment activity is well underway for entry into the 2017/18 academic year and the Foundation Year route is an integral part of the University's portfolio of provision, already receiving interest. Not only would a removal of the Foundation Year option remove that choice for prospective students but raise issues in relation to adherence of what is required under CMA regulations.

Definition and Data Issues around definition and the data used make it more difficult to discuss this important issue and proposal:

- The Welsh Government is not clear about precisely what provision currently falls within the scope of the consultation proposals/the definition of 'foundation years'.
- The Consultation refers to 'foundation years which extend the duration of some undergraduate degrees by adding a year of study'.
- The text only refers to extended undergraduate degrees, but the Figure 1 includes both undergraduate and postgraduate courses.
- It also equates 'foundation years' with 'year zero' on programmes of study (see our comments on the HESA and SLC data).
- Relevant courses are identified on the basis of course duration as reported to the SLC (i.e. four years or more).

The data relied on by the WG in its assessment of the situation are taken from different sources and have very different specifications which are not comparable. This appears to partly reflect some difficulty in accurately identifying all provision potentially affected by the proposals from current data sources across Wales. The definitions used for purposes of student support do not match easily with published data: relevant data appears to be specified and recorded in a number of different ways. This makes the potential scope, scale and impact of the proposals very unclear, and means that the data analysis presented is questionable.

Survey

As noted in the answer to question 1, Wrexham Glyndŵr University regards Foundation Years as a route into higher learning that is both highly valued by the students themselves as well as making a key contribution in enabling access to higher education. It is a distinctive yet complementary route into learning that sits alongside the broad and collaborative provision that higher and further education (as well other providers) together make available.

The University undertook a survey of all its Foundation Year students which overwhelmingly confirmed that the students not only see this as offering a valuable route into and through learning, but that they would not have entered higher education at all if support for Foundation years had not been available. And once in a University environment they find that higher level provision, support and ethos to be highly valuable.

WGFY015

Name – Michelle Matheron

Organisation – The Open University

Question 1 - We have outlined a series of concerns regarding foundation year provision principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes into higher education. Do you agree with this analysis? Why?

The Open University in Wales is not in a position to comment on the full-time foundation years provided by Wales' other institutions. The consultation document suggests that foundation years represent poor value for money, this concern is linked to the Welsh Government's policy decision to provide enhanced tuition fee support for full-time undergraduate students. Part-time students do not receive equivalent support so the value for money argument in respect of part-time students is likely to be different. The consultation document does not make this clear.

The consultation states that it is not clear that there is any "shortage of initiatives designed to raise attainment to a necessary level for entry to higher education or that there are significant problem with those initiatives." The Open University believes that its 'Access' provision and the community and partnership based widening access work that we carry out alongside that provision is one such successful initiative. We do not see any case for making changes to the way our provision is supported as it is unique.

In respect of OU 'Access' modules we believe that they provide benefit to the student and represent value for money. This type of provision is not offered anywhere else in Wales and meets needs that traditional HE and FE institutions do not currently meet. The OU Access offer provides student choice enabling anyone anywhere in Wales to study a short Level 0 course provided via distance learning. This offer is a unique contribution to the Welsh HE landscape and is not duplicated, nor could it be delivered, by any other provider. Any decision to withdraw support from the OU Level 0 courses would have a detrimental impact on student choice as they constitute a unique offer and form of provision. This provision also costs less to support than a full-time foundation year.

Question 2 - Which of the four proposals do you think should be implemented?

Based on the evidence presented in the consultation and as a result of the lack of clarity as to whether OU provision is included in the scope of these proposals we cannot, at this stage, make an assessment of which option should be implemented.

Question 3 - Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed.

The definition at paragraph 30 is not clear and in particular offers no clarity as to whether part-time and/or distance learning courses come within the scope of the type of provision this consultation is seeking to address. We would welcome much greater clarity on this.

Question 4 - What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

The Open University in Wales can only respond to this question in respect of our part-time courses and more specifically our 'Access' provision. If any of our provision was to come under the agreed definition of a foundation year and support was withdrawn for that provision we believe there would be a detrimental impact on part-time student numbers in Wales as it would remove a form of provision that is not provided elsewhere.

Part-time student numbers in Wales are already decreasing. There has been an 11 per cent decrease between 2009/10 and 2013/14. The Open University in Wales has managed to buck this trend and our overall student numbers have remained relatively consistent throughout that period. If support was withdrawn for our 'Access' courses we believe that it may impact on our ability to recruit students and to ensure that they are ready to study at HE level.

Women are more likely than men to study part-time (56.7% of part-time students in Wales are women compared with 51.5% of full-time students) and a considerably higher number of older people study part-time than full-time (21.8% of part-time students in Wales are over 40 compared with 1.5% of full-time students).

Twenty-three per cent of OU in Wales' students live in a widening access area (as defined by HEFCW widening access criteria) and 17 per cent of OU in Wales' undergraduate students have declared to us that they have a disability.

Of the students currently registered on an 'Access' course with The OU in Wales 25 per cent have declared that they have a disability, 36 per cent are from HEFCW widening access areas and 67 per cent are female. These courses are an important tool for opening up access to higher education and the unique mode of delivery (distance learning) means that we are able to reach more non-traditional learners.

Conclusion

While it is unclear whether OU 'Access' provision is within the scope of this consultation and potentially subject to a change in support we believe that it is essential to understand that this provision is unique, costs less to support than a full-time traditional foundation year, and opens up HE to non-traditional learners. The Open University in Wales believes that our provision should not be included within the scope of this consultation and should remain supported as it is currently. Any decision to remove support from OU Access courses will have a detrimental impact on student choice and widening access. We also look forward to working towards a more sustainable funding system for part-time HE in Wales following the publication of the Diamond Review later this year.

WGFY016

Name – Dr Willy Kitchen

Organisation – Foundation Year Network

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

Supporting comments

The Foundation Year Network (hereafter 'FYN'; see box 5 for further context) believes that many of the concerns raised in the consultation document are either hard to sustain, or else based upon fundamental misconceptions of the nature and operation of foundation years. The analysis as presented in the consultation document is particularly weak in relation to the benefits of HE foundation year provision to undergraduate students when compared to alternative routes to higher education offered by level 3 providers.

The evidence base upon which to assess properly whether or not foundation years 'represent poor value for money' does not currently exist at a national level. If it did, members of FYN are very confident it would clearly demonstrate that foundation years in fact represent much better value for money than many alternatives. It is for this reason that many individual HEIs continue to resource their own foundation year provision.

Increasing numbers of students appreciate the added value of this provision by choosing integrated degree with foundation year pathways in preference to other alternatives. Reasons cited by students for actively choosing to follow foundation year pathways at Welsh HEIs include the added confidence that comes from studying, being supported and demonstrably succeeding within a real HE context; the provision of a guaranteed progression pathway from foundation year to level 4 study upon achievement of the requisite progression requirements (no such guarantee exists for students undertaking level 3 courses in FE); the deferred nature of loan repayments for HE study (pay once you earn) compared to the 'upfront' nature of some costs incurred by accessing FE provision; the greater potential to access maintenance support within HE; and critically, for those mature students who see foundation years as a 'second chance', the opportunity to study in a dedicated fashion with like-minded people who are fully committed to a programme of study. By contrast, returning mature students report that the equivalent FE experience can be compromised by the greater immaturity and lack of focus/motivation displayed by some younger FE students.

The consultation document fails to grasp the common essence, but also the significant diversity, across foundation year provision, within both Welsh and English HEI provision. Individual foundation years are carefully designed by HEIs at local level to meet the specific needs of students accessing particular courses at their institution, taking into account the particular admissions criteria being applied to this

specific student group. This specificity means that prior attainment (whether measured by the quantity or quality of prior educational or other equivalent experience), curriculum content, delivery and assessment methods, are all tailored to the particular institutional context, in a way which is not possible in an FE college or school. Entry requirements, curriculum delivery and on-course attainment - both at UG foundation year level and at all subsequent levels of degree study - are all monitored, evaluated, reviewed and where appropriate revised in line with standard HE quality assurance and enhancement processes to ensure the best student outcomes are achieved. As a result of this careful tailoring, even within the same HE institution, it is not uncommon to find very different entry requirements operating depending upon the nature, aims and design of the specific foundation year programmes offered.

Foundation year students in general experience a better and more successful transition from foundation year to further degree level study because of the tailored nature of their foundation year experience and the greater familiarity they have developed within their chosen HEI. They develop confidence and gain an effective working knowledge in the use of all aspects of their institutional learning environment (campus layout, library and IT resources, virtual learning environments, travel infrastructure, associated accommodation etc.) as well as the many varied learning and teaching support resources available to them (academic and support staff and services, students union, co- and extra-curricular opportunities). For many widening participation students in particular, this opportunity to develop confidence and skills on campus is a critical part of their successful transition into HE, which cannot be replicated in smaller institutions where HE practices are not the norm.

Furthermore, because of their integrated structure, modes and location of delivery, Foundation Years are much better placed to help students develop those very specific study skills, familiarity with academic conventions, and targeted research, experimental, problem solving, and critical thinking skills, which are essential to success on the specific courses of which their foundation years form a part.

For all of these reasons, the experience of many institutions represented within the Foundation Year Network suggests that retention and attainment at foundation year level, progression rates to subsequent levels of UG study, retention and attainment in terms of final degree outcome for the specific types of entrants admitted to these individual foundation programmes, are significantly better than that achieved by equivalent students entering via the level 3 alternative pathways alluded to in the consultation paper.

The consultation document suggests that funding students on foundation years 'would appear to substantially increase the cost of provision to Government and the student'. This assertion can only be tested by making a direct comparison between achievement at level three or on foundation years, progression rates into/within degrees, and the ultimate degree attainment of students following these alternative pathways. As noted above, these data do not currently exist at a national level - and would be extremely difficult to collect given the significant diversity of provision both within HE and FE institutions - which means the best current measure has to be that of the individual institutions themselves. Recognising these significant methodological challenges, however, the Foundation Year Network would be very

willing to play an active role in any research commissioned by the Welsh Government which set out at a national scale to measure the costs and benefits of HE foundation years relative to any alternative access pathways.

Internal data collected as part of the review of ongoing foundation year provision at a number of HEIs represented with FYN suggest that students who commence their studies on an integrated foundation year are more likely to progress and achieve more highly at subsequent levels of degree study than students entering HE at level 4 who have completed BTECs, Access to HE Diplomas, or other alternative forms of level 3 provision as a means of accessing. FYN suggests that it is primarily for this reason that many HEIs have continued to operate the foundation year model over many years.

To the extent that foundation year provision within HEIs is growing - in both England and Wales - this most likely reflects a combination of factors, chief amongst which may be the demonstrable success of the foundation year model at individual institutional level compared with other alternatives, in combination with the clear decline in appropriate alternative provision in many parts of the FE sector. In the latter respect, the massive reduction in provision of adult learning in England and other parts of the UK is well documented, which can also manifest itself in significant variability in the opportunities available to study in different subject areas (including, for example, a significantly more limited social science and humanities provision in some areas).

FYN strongly refutes the suggestion implicit in para 16 that foundation years, as one key tool of widening access in many HEIs, are '... really just a particular form of recruitment'. To the contrary, foundation years have been in operation at many institutions for up to 40 years, during which time they have been proven again and again to be an effective tool in enabling the successful transition of particular student groups into HE and, as such, are offered in the best interests of those students, rather than simply to satisfy any particular short-term recruitment agenda. In the 'increasingly competitive higher education landscape', HEIs cannot afford to see overall degree attainment drop (a key performance indicator for prospective students reflected in many 'league tables'), so the continued existence and expansion in FY provision is a proxy measure of their success in raising attainment effectively and - when viewed in the context of a whole degree (rather than as a stand-alone year) - demonstrates their overall cost-effectiveness relative to other alternative provision.

By accepting non-standard entry students onto many of their foundation years, HEIs also risk lowering the overall average grade tariff for their institution (another proxy measure for 'quality' used in league tables). Rather than a straight 'recruitment tool' therefore, foundation years are much more likely to be viewed and employed by individual HEIs in England and Wales as an important and effective tool to widen access. This is a point which has been clearly noted by the Office for Fair Access in England, who now actively encourage HEIs to consider what they are doing to widen access for mature students, including through connections with the Foundation Year Network.

FYN also disagrees with the consultation document's treatment of 'conversion courses' (para 12), when it suggests '... the challenge of achieving the usual standard of attainment for entry on to a degree course in a subject to which the student has no prior exposure in a single academic year seems great, particularly so for those students whose prior attainment is likely too weak for entry to undergraduate study.'

This analysis is flawed in two key areas. First, a successful HE career crucially requires the development of self-directed learning and critical thinking skills, and an attitude to learning, which is about the quality of thought and approach, and the depth of student learning, rather than being about the breadth of coverage within a particular curriculum. In this respect, a carefully constructed curriculum which is designed to develop student skills and to articulate effectively with subsequent years of degree level study, can be delivered very effectively in a single year when situated within an HE context.

We agree, however, that it may be much harder to achieve this same outcome for students studying for a single year on many alternative pathways delivered in FE and colleges. This is another argument, therefore, for the relative cost-benefits of an intensive, immersive integrated foundation year approach to HE transitions for particular student groups.

Second, the notion that a student's 'prior attainment is likely too weak' (see also paras 9-11), demonstrates a fundamental misunderstanding of the student attributes looked for by HE admissions staff when considering individual applicants. Entrants to foundation years generally do not have the same paper-based entry qualifications required of entrants directly into subsequent levels of undergraduate study. Nevertheless, they must all demonstrate the academic ability to succeed at and beyond foundation year level - whether attained via prior educational achievement, work-based learning or life experience - and the awareness of subject area and preparedness and motivation to succeed which will enable them to negotiate a challenging transition into HE study.

Because of the scale of the challenge involved in making a successful transition, foundation year admissions tutors are always careful to assess each individual applicant's likelihood to succeed on an HE based course and, where in their academic judgement the applicant is not yet sufficiently equipped, they will often suggest alternative pathways, including level 3 study in the FE sector where this is relevant and available.

FYN can provide a range of examples of institutional approaches to admissions, including entry requirements, if this would assist the Welsh Government further in understanding the complexities and specificities of FY admissions practice.

Question 2 – Which of the four proposals do you think should be implemented? Why?

Proposal 25a ('do nothing') should be implemented.

This is the most cost effective policy option when assessed in terms of the retention, progression and achievement of students entering HE via foundation year routes rather than via the alternatives alluded to in the consultation document. This is particularly true of those students entering HE from 'hard to reach' widening participation backgrounds, including many mature students who have been failed by alternative forms of provision in the past.

Proposal 25b ('a reduced level of fee and/or maintenance support') would create the worst of both worlds, since by undervaluing and underestimating the true costs of providing an effective preparation for successful HE study (whether in an HE or an FE context), this policy approach would inevitably encourage the underfunding of foundation year level delivery relative to other levels of HE provision, when the reality is that working with students at this level is necessarily more intensive, in terms of the contact hours required, initial support needs of many students, and the need to keep cohort and/or class sizes small relative to some subsequent levels of HE provision. As the consultation document itself recognises, the withdrawal of maintenance support would also have hugely detrimental effects since students' living costs do not reduce simply because they are studying in one context or another.

As the document also identifies, Proposal 25c has little obvious policy justification. Proposal 25d, on the other hand, would not - as the document claims - mean that '... [w]idening access activity would operate as usual'. To the contrary (see 4 below), this option would very likely have a devastating impact on the chances of some Welsh-domiciled groups (e.g. mature) to access a significant number of HEIs in both England and Wales.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

No.

To base a definition of courses that will/will not be funded upon the notion of 'rais[ing] the attainment of an individual to that required to begin a degree programme' misunderstands the nature of the foundation year as an integral part of the degree programme itself. It also misunderstands the significant amount of 'levelling' - or 'bringing to the same starting point' - which takes place in the first year of most undergraduate programmes of study, regardless of their designated level within FHEQ. Indeed, many students progressing from their foundation year into subsequent levels of their degree often find themselves significantly better equipped to succeed than many of their peers entering via traditional A level or other alternative level 3 routes.

Furthermore, there is no satisfactory methodology for directly comparing outcomes at foundation level, A level or other alternative level 3 routes, so it is not possible to

exactly establish the 'level' of provision which equates to foundation year level 0. Indeed, many FY practitioners would argue that level 0 necessarily operates across three levels of the FHEQ (from 2 to 4), depending upon which aspects of the development of skills, knowledge and understanding, and which areas of the curriculum, are being focused upon at any point in time.

The experience of study on a foundation year is qualitatively so different from that provided by any other forms of transitional study into HE that any definition limited solely to notions of 'attainment', 'level' and 'additional period of study' will never capture effectively what is, and what is not, most appropriately and successfully delivered in an HE context and what in an FE context.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

If Welsh ministers were to cease support for these courses they would instantly narrow access to a range of HEIs for some of the most disadvantaged potential students. This would particularly be so in the case of a number of 'selective' institutions in England and Wales which require high UCAS entry tariffs as part of their standard entry requirements.

Groups particularly disadvantaged would include any mature students wishing to access HE provision locally in Wales, and Welsh-domiciled students offering 'non-standard' entry qualifications (including a range of alternative level 3 college qualifications) who wish to access HE provision in England. Table 1 seems to suggest the latter group constitutes up to a third of all those funded students under consideration here.

By developing a policy which forced students without standard entry qualifications back into the very level 3 system which can be argued to have already failed them once, these students are more likely to be failed again, or to choose not to risk repeating the same negative experience a second time - by not re-engaging with further or higher education at all.

In addition to mature students, other groups likely to be directly disadvantaged by such a decision would include younger students who underperformed at level 3 due to a range of extenuating circumstances, care leavers, students with special learning needs which may have been left undiagnosed or under-supported at school or college, and students affected by a range of mental health difficulties. All these groups can benefit from the longer and more supportive contextualised transition into HE which foundation years provide.

Ceasing support for foundation years may also differentially affect students from the groups listed above who have a particular subject interests which is not currently effectively supported or developed outside of HE provision.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

The Foundation Year Network (FYN) was formed in 2007 and draws its membership from academic practitioners with an interest in Foundation Year teaching enhancement issues. It currently has 120 members working in 35 UK HEIs, including three major HE providers in Wales.

The Network's objects include to represent, promote and support 'good practice in foundation year provision' and 'diversity of provision for entry into higher education'. Collectively, FYN's members work with thousands of past and present foundation year students, on a diverse range of programmes, many of which have been in existence for twenty years or more.

As noted in a number of places in our response, the Network would welcome the opportunity to contribute to any future research the Welsh Government may wish to commission to better understand the relative value of the different alternative pathways into and through HE which have been considered in the current consultation.

All members of the Network have been invited to contribute to this response, which deliberately deals with the nature and place of foundation years in the HE sector generally, rather than with the specific context of individual foundation years. We understand that a number of Welsh HEIs will be submitting individual institution-specific responses which are better placed to discuss individual programmes in Wales where this is appropriate to do so.

WGFY017

Name – Leanne Holborn

Organisation – HEFCW

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

Supporting comments

The consultation does not provide a reference to any research and evaluation undertaken to assess and compare the benefits of the foundation year and alternative routes. In particular, we are not aware of any evidence to support the concerns expressed that foundation years represent poor value for money and do not obviously provide any benefit to the student. Cost-benefit judgements should take into account progression and success of students on foundation years in Higher Education (HE) compared with progression and success of students in school/FE provision.

The current policy approach does not have its roots in the Reaching Wider (RW) initiative of 2002 (paragraph 13 of the consultation) which was established as a regional widening access initiative promoting collaboration between institutions. Indeed it was very clear from the commencement of Reaching Wider that RW funding may not be used for the direct support of award-bearing HE provision or post-16 education and training (W02/61HE, para 24). Foundation year provision relates to institutional widening access strategies.

The outlining of concerns is not supported with any presentation of evidence. We have attached at Annex A the relevant student information from the Higher Education Statistics Agency (HESA) that we have used to inform this response.

According to HESA data, counting foundation years as those years coded with year of programme 0 (Year 0), universities in Wales had a higher proportion than higher education institutions in England of students with Year 0 in 2013/14 and 2014/15 (though Wales has a smaller proportion that are in year of programme 4+) and the proportions of full-time (FT) undergraduate (UG) students in Wales that are coded as Year 0 have increased over the past three years, though numbers are small, with 1,571 coded as Year 0 in 2014/15. However, around half of the Year 0 students in Wales in 2014/15 were from outside Wales, and therefore not in receipt of Welsh Government tuition fee grants. The evidence therefore suggests that foundation year provision at Universities attracts rest of UK and international students, and their investment in these courses contributes significantly to making this provision viable. If there was limited/no student support for full-time foundation year students at higher education institutions, the provision might not be viable and a wider range of students would be disadvantaged. This consultation does not provide evidence that this has been considered.

The foundation years are provided as a widening access route to demystify higher education, improve progression, introduce HE teaching styles and assessment, familiarise students with the HE physical environment, enable easier transition from one sector to another. We are unclear whether any comparison has been made of different routes against these objectives.

Foundation years have been a long standing route into higher education, particularly in relation to both widening access and building subject knowledge. Indeed new foundation year provision is being piloted this year at Oxford University Lady Margaret Hall to widen access. Under the Lady Margaret Hall scheme potential foundation-year students will be recruited using similar criteria to the university's access scheme, which targets disadvantaged areas and neighbourhoods with low university participation and state schools where few pupils apply to Oxford.

Foundation year applications may have increased in response to Welsh Government FE funding reductions including funding for Access to HE provision. A more holistic assessment of supply and demand for this market segment would provide a more robust evidence base for policy making. There is no evidence in this consultation that the needs of students have been considered and taken into account in shaping these proposals.

It is unclear whether the extent of the financial saving would outweigh the wider benefits of enabling students to begin their foundation year studies as part of a degree programme.

Question 2 – Which of the four proposals do you think should be implemented? Why?

We would favour the status quo option (a) until a rigorous evaluation of the full range of benefits of foundation years compared with other provision has been made. Our position is informed by the proposed timing of implementing changes to student support for foundation years (2017/18) which may affect the viability of provision and will make change management difficult for institutions. The uncertainty about provision from 2017/18 may also impact adversely on potential applicants.

Regulated higher education providers will be submitting their 2017/18 fee and access plans to HEFCW, which will include foundation year provision, by the end of May 2016. Fee and access plans set out applicants' commitments to supporting equality of opportunity and the promotion of higher education. Foundation years will be part of Regulated Higher Education providers' commitment to HEFCW and to potential students.

Higher education providers will currently be finalising course marketing and recruitment materials, including degrees with foundation years with a view to publishing this material in summer 2016 for admissions in 2017/18. Limitations on student support may impact negatively on course viability.

The greatest element adding to the overall cost to government of this provision is the tuition fee grant which is being considered through the review of HE funding and student finance (Diamond Review). As this review is ongoing, it would seem inappropriate to implement any change to these arrangements until the Diamond Review Panel has concluded and presented its recommendations – and the related evidence – in full.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

Para 30 defines some characteristics of a foundation year rather than providing a definition. The definitions will need to be much clearer if the entitlement of foundation year students to student support needs to be re-assessed.

It might also be useful to consider the articulation of the foundation year to the course it leads on to – will any foundation year give a student an equal opportunity of success, or will a foundation year that is integrated into the programme increase the ability of an individual to complete the qualification successfully.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

Welsh Government would be closing a widening access route to HE which might not otherwise be available within the students' region, given that widening access students often choose to study locally, which would restrict opportunity.

It might mean more money is available for other things (including to support widening access and other government priorities) – if less money is going to the tuition fee grant (prior to the outcomes of Diamond being known). However, there is also a key risk that any savings would be off-set by reduced income to the Welsh HE system because of a loss of students from the rest of the UK.

There is a query (as above) whether a student taking a foundation year that articulates to a specific course has a better chance of success, and therefore is more likely to benefit from the additional year's study than a student taking an access year that is not articulated.

If a decision is taken to cease funding for foundation years in HE, then there will need to be more joint working between HEIs and FEIs to ensure that articulation between the FE foundation/access courses and HE provision is improved – something which could be difficult to achieve in a competitive context where funding was being removed from HEIs.

People taking these courses are likely to have not achieved the grades to enable them to enter the HE course directly, thus the need for this additional subject support. HESA data show that Year 0 students with A levels or equivalent generally have lower tariff point scores.

In terms of looking toward the location and characteristics of students on Year 0, in 2014/15 the data in Annex A shows that three institutions had the bulk of the Year 0 enrolments; University of South Wales, Cardiff Metropolitan University and Wrexham Glyndŵr University. Each of these have grown their year 0 provision over the past three years. Analysis indicates that –

- Year 0 Welsh domiciled students are more likely to be from Communities First areas or the Welsh Index of Multiple Deprivation (WIMD) bottom quintile than those who entered directly onto year 1 of the programme (Year 1).
- Year 0 UK domiciled students are marginally more likely than Year 1 UK domiciled students to be from low participation areas.
- Year 0 students domiciled in Wales or the rest of the UK are more likely than Year 1 students to be 21 or over. The opposite is true for Island and overseas students.
- Year 0 students are more likely to be male than Year 1 students (about two thirds of all year 0 students are male, the figure is under half for Year 1 students).
- Year 0 students who had A levels or equivalent on entry tended to have lower tariff points scores than those starting at Year 1. This was the case for Wales and other UK domiciles.
- The percentage of enrolments in Science Technology Engineering and Maths (STEM) subjects is much higher for Year 0 than for Year 1 (72% compared to 34%).

In conclusion, the move to cease support for these courses would disadvantage the less affluent people, particularly less affluent males, who are already under represented, and would undermine growth in STEM provision, again particularly STEM provision for those less affluent.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

From the consultation it is not clear that there has been a mapping of the foundation level provision in HEIs and in FEIs, to see whether there is any duplication/overlap. This should be done before making any decision regarding funding, to ensure that any funding decisions do not lead to gaps in provision which would disadvantage students.

As noted above, given the ongoing Diamond Review, it would seem inappropriate to take a decision of this sort without supporting evidence ahead of any consideration of the Diamond Review report and its recommendations.

Any changes to programmes must align with the Competition and Markets Authority's (CMA) guidance regarding the provision of clear, accurate and timely information. This may impact on the timescales for any proposed changes.

If it is decided that support for these courses should end, we would like to reiterate the need for a reasonable transition period, particularly given that it is already too late for the development of fees and access plans and the publishing of prospectuses for 2017/18

WGFY018

Name – Pierre Cox

Organisation – VOICE

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

Supporting comments

It is Voice's view that the Welsh Assembly is right to review the support given to students studying on these Foundation Year courses – to consider the value for money when compared to other types of provision (e.g. FE courses) that meet a similar need. However, we think that a breadth of choice, offering a wide variety of routes into HE, is important in widening access. Some low attaining students may well find these university-based courses to be more motivating than similar courses in FE colleges.

Also, we recognise that by supporting students on these courses the Welsh Assembly is effectively subsidising the expansion of University provision within Wales. However, we think that this is a good use of public money – Wales needs to maintain and further develop a strong HE sector.

Voice believes that the issue of student debt is primarily a personal issue for each student and his/ her family.

Question 2 – Which of the four proposals do you think should be implemented? Why?

Of the 4 options Voice would prefer (b) – offering a reduced level of support. This perhaps reflects the fact that the level of study is lower than that of a traditional undergraduate course, but would still offer students the choice of this route. It would also save money for the Welsh Assembly Government (which could be re-invested in improving other existing pre-university provision) but would also lessen the negative impact on universities seeking legitimate ways to expand and develop their income streams.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

Yes the criteria help to define the type of course which is being discussed.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

We do not have enough detailed knowledge here. However we firmly believe that each individual has to find their own learning pathway. What suits one person does not suit another. Some people flourish in one context but not in another. Some low attaining students who have perhaps failed in school may well find courses in an FE college to be too similar in terms of participants and approach to those that they have experienced in school. A university-based course, on the other hand, leading into a degree course could well feel like a fresh start and prove to be more motivating and success generating for the student. This facilitating of wider access would be lost if the WA ceased its support altogether.

WGFY019

Name – Ian Toone

Organisation – VOICE

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

Supporting comments

Whilst it is perfectly legitimate for the Welsh Government to review whether the current support given to Foundation Year students is legitimate and sustainable, it is important to offer a variety of routes into HE if the aim of widening access is to be fully achieved. Some students may well find these university-based courses to be more motivating than equivalent courses in FE colleges. Also, attending a Foundation Year course would, in most cases, provide a smoother transition to Year One of a degree course, compared with Access to HE or similar courses offered in FE colleges. Performance on a Foundation Year course would also be a more effective indicator of suitability to progress to Year One, as the content and standards would be more commensurate with the requirements of HE than those of course undertaken in the FE sector (where it would be unlikely that the content would relate specifically to a particular degree course at a particular university, and standards would tend to be more generic).

Whilst it is recognised that the support given to students on such courses means that the Welsh Government is effectively subsidising the expansion of university provision within Wales, this should be considered to be a good use of public money, as Wales needs to maintain and further develop a strong HE sector.

Whilst it is acknowledged that Foundation Year provision may increase the burden of debt on students, this is primarily a personal matter for each student and his or her family.

Question 2 – Which of the four proposals do you think should be implemented? Why?

We are concerned that the four proposals do not cover all available options. The scarcity of resource relates to a number of wider issues, including negotiated deals with the Westminster Government, Welsh Government policy decisions to fund the majority of Welsh students' tuition fees regardless of their financial means, and the increasing numbers of Welsh students who are choosing to study elsewhere in the UK (thus, taking money out of Wales and away from Welsh universities). The issue of Foundation Year courses is relatively minor compared with some of these wider issues. For example, whilst the number of Welsh students studying for a Foundation Year in Wales is about 1200, it appears that about 2000 Welsh students per year elect for a university course in England. Rather than singling out Foundation Year courses, there needs to be a wider review of HE funding.

If forced to choose between the four suggested options, we are inclined to choose option (b) – offering a reduced level of support – although this would need to be discussed with universities, as it may be that universities would want to adjust their fees for Foundation Year courses to more accurately reflect the cost of such provision.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

Yes, these criteria will help to define the type of courses being discussed. However, they are not perfect and so will need to be applied carefully and critically. For example, with regard to attainment, whilst it is generally the case that Foundation Year courses are designed for students with non-standard qualifications, this may include students who fulfil the general requirements for matriculation but not in the specific subjects required for a particular course (for example, students with arts subjects who wish to enrol for a science degree). Alternatively, a student's life experience or work history may indicate an appropriate level of attainment but, rather than undergoing the complicated process of accreditation of prior experiential learning, it is often more economical and straightforward to embark on a Foundation Year course to prove eligibility to join the main degree programme. Also, it is not quite correct to say that the level of provision is typically level 3, as towards the end of the year students will need to be working at the next level in order to show that they are ready to start the main degree programme. In some Foundation Year courses (such as art and design), the aim is more to do with broadening experience and skills rather than furthering academic attainment. Furthermore, there are many degree programmes which take four years – typically those which include placements or professional accreditation.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

Students opting for a Foundation Year course form a very diverse group. Some will have left school with few qualifications and gained life experience and work-related skills over several years before thinking about enrolling as a mature student. Others will have taken the wrong A levels for the degree they wish to study, or will have lower grades than those usually required to start the main degree programme, or may have taken an unconventional route (for example an apprenticeship or BTEC Diploma rather than A levels). Each individual has to find their own learning pathway. What suits one person will not necessarily suit another. Some people flourish in one context but not in another. Some low attaining students who may have failed in school may well find courses in an FE college to be too similar in terms of participants and approach to those experienced in school. A university-based course, on the other hand, leading into a degree course, could well feel like a fresh start and prove to be more motivating and success-generating for the student. This facilitating of wider access would be lost if the Welsh Government were to cease support for Foundation Year courses altogether.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

As indicated in our response to Question 2 above, we believe that a wider perspective needs to be taken, requiring a review of other strands which join together to form the complete web of funding issues affecting Higher Education.

WGFY020

Name – Anonymous

Organisation – Anonymous

General comments

Wishes for response to be kept anonymous

WGFY021

Name – Karen Williams

Organisation – UCU Wales

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Neither agree nor disagree

Supporting comments

As an organisation representing both the HE and FE sectors, UCU Wales are not in a position to agree or disagree with this statement. In terms of defining value for money, we do not equate this to quality. The focus should be on the quality of the provision rather than whether it represents 'value for money'. We fundamentally disagree with the assertion that quality of education can be achieved through marketised competition.

From our point of view creating an extra burden of debt for students, is unacceptable and is counterproductive to widening participation.

In addition students need to be able access appropriate foundation level provision that will allow them the smoothest transition to HE, whether they are school leavers or returning adults.

What is important is that students are able to access high quality opportunities that adequately prepare them for HE, at a variety of easily accessible locations, at a stage appropriate to their personal circumstances, which will not cause financial disadvantage.

Question 2 – Which of the four proposals do you think should be implemented? Why?

UCU Wales does not favour any of the suggested options, as we represent members in both the FE and HE and will therefore not take a position that favours one sector over the other.

Regardless of whether Foundation courses are delivered in HE or FE, we question why such courses attract a fee, as they are not, strictly speaking 'degree' level courses?

UCU fundamentally do not support the student fee regime, but neither do we advocate that HEI's should be excluded from the delivery of Foundation courses, if this is the best environment for students.

As above, what is important is that students are able to access high quality opportunities that adequately prepare them for HE, at a variety of easily accessible locations, at a stage appropriate to their personal circumstances, which will not cause financial disadvantage.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

Not sure what the definition is. The paragraph states points to be considered in a definition, but it is not possible to agree or disagree without knowing exactly what the definition is.

We do however urge caution when using student attainment levels to define issues, as attainment levels are reliant on several factors, many of them outside the control of the provider.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

We have concerns that adult returners in particular would find it difficult to access HE, if support for Foundation courses was withdrawn. This would likely have an impact on second chance students who have previously been excluded from HE, for financial, health or caring reasons; those groups for whom widening access provision is most important.

As previously stated, in terms of widening access, promoting equality and social inclusion, what is important is that students are able to access high quality opportunities that adequately prepare them for HE, at a variety of easily accessible locations, at a stage appropriate to their personal circumstances, which will not cause financial disadvantage.

We are also concerned that the skills set, which lecturers delivering this provision in HE have, will be lost to the sector. In our view it would be a big mistake to lose this cohort of staff and their skills set given the direction of travel in relation to TEF. Transitioning staff in HE who deliver Foundation Studies, to support all school leavers new to HE would be, in our view, a sensible move within institutions, should the government decide to move this provision into FE.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

A crucial issue for UCU Wales, is that there is a long-term strategy for improving post 16 education which provides coherent progression routes for students. We therefore welcome the proposal set out in the Hazelkorn Review for a joint FE/HE body. However, we would like a commitment from this body and Welsh government that discrepancies in the workload implications for staff delivering HE in FE, compared to staff in HE, will be addressed and eliminated. Without this situation being rectified, it will not be possible to provide consistency in the quality of delivery or of student experience, regardless of where it's offered.

WGFY022

Name – Gwyndaf Tobias

Organisation – University of Wales Trinity Saint David

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Neither agree nor disagree

Supporting comments

The argument presented is, in the main supported by University Wales Trinity Saint David (UWTSD) in instances where there are alternative routes / options of study are available.

Whilst historically UWTSD have offered Year 0 (CQFW Level 3) courses (which have in the main been limited to those that sit under our Faculty for Architecture, Computing and Engineering), these have been replaced by a CertHE STEM which starts at a level 4 and appears in our fee plan at a reduced rate of £4500 to encourage enrolment.

Our four year degree programmes start at undergraduate level and comprise of Integrated Masters and courses that offer a sandwich year to accommodate industry placements. These all start at level 4.

Our only level 3 validated provision is offered at WEA Cymru, where four Foundation Certificates are offered. In 2015/16 these courses attracted 27 enrolments. However, these are not funded by HEFCW.

Therefore, the implication of this policy change would be minimal on UWTSD and compliments our FE/HE Group structure and our franchised provision.

Welsh Government however will need to give consideration to areas where alternative routes / options for study are not available or become inaccessible due to their location. In such instances Welsh Government will need to consider how such gaps can be addressed and funded.

Question 2 – Which of the four proposals do you think should be implemented? Why?

UWTSD supports the option for ceasing support for the foundation year (year 0) where alternative routes are available. Welsh Government will need to ensure that further education has the capability of adapting to the enhanced demand that ceasing of HE funding in this area may create. Whilst this will have minimal impact on the UWTSD offer, the picture may possibly be different for other institutions in Wales.

The result of this policy change will hopefully in the main create greater opportunities for progression between the FE and HE sectors, and remove financial barriers to those wishing to achieve foundation level status.

Careful consideration needs to be given to instances where no alternative routes are available. In such instances, Welsh Government may want to consider offering a reduced level of fee and /or maintenance support for the foundation year (as set out in option b).

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

The definition should offer more clarity so that there is no ambiguity between a foundation year and a foundation degree. There are elements in paragraph 11 which could be added to paragraph 30 to better define this.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

Aspirational learners who are not located in areas where level 3 provision is taught, or without the means to access provision away from their locality may be disadvantaged. As outlined above, Welsh Government may want to consider applying option b to such instances.

Consideration should also be given to how students may be disadvantaged in terms of the financial support available at HE through bursaries etc. that may not be available via FE routes.

This policy change would have limited impact on the students at UWTSO for reasons cited in Question 1. Our FE / HE dual sector Group structure has enabled us to ensure that widening access considerations are central to our academic provision. Our only validated provision at level 3 is delivered through the WEA Cymru. They offer education to adults in the community in partnership with other organisations in community locations across Wales and engage particularly with those experiencing disadvantage. Whilst funding for this programme is not supported by HEFCW, this offers Welsh Government an illustration of the niches of widening access groups that this policy change may negatively effect.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Encouraging providers to offer foundation levels of study at no financial impact to the student should in the main support the widening access agenda. Careful consideration needs to be given on how this will affect minority / niche groups such as WEA provision.

The definition of foundation years needs to be more clearly defined so that it can be clearly and carefully communicated to potential students.

The policy change needs to be carefully communicated to potential students and employers so that they are aware of alternative routes of study should the ceasing of financial support to foundation years be applied.

WGFY023

Name – Tim Pratt

Organisation – Associate of School and College Leaders (Cymru)

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Neither agree nor disagree

Supporting comments

The issue is more complex than this question supposes. It is true that in some areas foundation year courses represent poor value for money. However, in other areas it provides essential training and preparation for HE that is not available elsewhere.

Question 2 – Which of the four proposals do you think should be implemented? Why?

OPTION C represents the most sensible way forward. It allows for the retention of foundation year courses where it can be shown they are essential, and removes the support for those courses that are not. In this way it does not penalise the provision of the few courses that really are necessary.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

Partially – it would be wise to include a fourth element, namely “the availability of alternative provision outside of foundation year courses”.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

As previously highlighted, care must be taken to ensure that there is alternative provision to make sure that students are not disadvantaged.

In particular, Art foundation year courses have for many years become an essential part of preparing students for their degree courses. This is a special case that needs to be looked at – students’ needs might be better served on a four year degree course.

WGFY024

Name – David.B.Jones

Organisation – Coleg Cambria

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Agree

Supporting comments

We agree. The current arrangements for funding foundation year provision are costly, unaffordable and subsequently unsustainable. There is also the possibility that current practice discriminates on the basis of age, as there are restrictions in FE/WBL that don't apply in HE.

Alternative provision exists at FE colleges in Wales that can achieve the same or better outcomes. At FE colleges this is delivered by teaching staff who are more than appropriately qualified, and who value and are experts in delivering programmes at this level (level 2/3). Additionally, the cost of delivering this alternative foundation year provision provide significantly better value for money for the public purse (indeed these programmes are mostly already in place, and are now facing competition from costlier, but heavily subsidised HEI alternatives).

Furthermore, and importantly, the college options are local to learners, and won't burden them with excessive and unnecessary debt.

Provision that is available at FE colleges, particularly in the key STEM areas, is not in any way substandard or unfit for purpose. Colleges are well equipped through the related capital investment of WG and institutions themselves over the past 10 years, particularly linked to the Transformation programme. This has removed wasteful overheads to ensure expenditure provides maximum benefits to learners.

The current arrangements delivered largely by HEIs are also insufficiently engaged with employers nor linked with apprenticeships. This is a fundamental weakness, and undermines the economic value and impact to Wales.

Changing from the current arrangements will have an impact on the income to institutions delivering foundation years "funded" through the HE system, but vitally, will have no negative effect on learners. It will just vastly reduce or remove their student loan debt, and provide an opportunity for the Welsh Government to make better use of scarce public money.

Hopefully, such a change would encourage colleges and HEIs to work together more effectively, changing out-dated practice to provide a far more effective and efficient offer for business and for the Welsh Government. This is a really positive opportunity for Wales, and one which is consistent with aspects of the Hazelkorn Review.

Finally, Welsh HEIs need to be higher ranked in the various UK and world University Rankings. Removing the current arrangements for foundation years, and challenging our HEIs to focus on “real” HE and raising entry standards will support their rise through the rankings. Some of our newer universities are pseudo-FEIs.

Question 2 – Which of the four proposals do you think should be implemented? Why?

We support Option ‘d’.

This is the only option that addresses the clear ineffectiveness, unfairness and unsustainability in the current system. It needs to be implemented from September 2017. As outlined in our response to Q1, it should be noted that making this change would not disadvantage students, but would demonstrate value for money for the public purse.

Option ‘a’ is unsustainable, ineffective, unfair and divisive.

Option ‘b’ is unnecessary. Alternatives to the foundation year provision are available in colleges in Wales for those who require the support of public funding. The offer could be developed further, linked to a more coherent policy and strategy, and with minimal if any additional demands on FE/WBL funding.

Option ‘c’ (similar to ‘b’) is just unnecessary, for the same reasons, and as the consultation document states “... *there is little obvious policy justification for such a partial approach ...*”

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

Yes. Three important additional factors are:

- Recognising and supporting literacy/numeracy and English/maths deficits. This is often the underlying deficiency for learners, and is more appropriately addressed through the support of specialist FE-level professionals.
- The pace and weight (“credit” rating) of foundation programmes cannot be unrealistically slow or light, or the programmes will be unfit for purpose as preparation for progression to further study, apprenticeships or employment in the corresponding sector.
- The credibility of foundation programmes is undermined by inconsistent and largely very loose entry requirements.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

Some older students may prefer to learn within a similar peer group. This can be addressed through Access to HE programmes in FE colleges.

However, a limiting factor for older learners are the current age-related restrictions that apply to many FE and WBL programmes for those aged over 25. This might explain some of the growth in foundation years in HEIs, as the current practice in effect provides an all-age HE funded system (compared to a restricted-age FE college based offer), albeit with the unnecessary accumulation of individual and national debt through the university based approach.

It is understood that some HEIs support the continuation of the current funding arrangements on the basis that their foundation years attract recruitment from outside of Wales. If the decision is made to cease support for these courses, there need be no impact on learners domiciled in England (as they already have to pay, so it is a personal choice).

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

At Coleg Cambria we recognise and applaud innovative developments such as 2-year Bachelor degree programmes, and degrees with on-going work experience at Glyndwr University. Other opportunities exist by developing more Higher Level apprenticeships which more purposefully link HE level study with skills development and employment.

However, we have become increasingly concerned and frustrated by the impact of Glyndwr's admissions practice on our enrolments, and the lack of a joined-up FE/HE offer (as is also the case in other parts of Wales and the UK), to ensure value for money and to better meets the needs of local employers and communities. These developments include, but are not limited to the factors around foundation year programmes that are the subject of this consultation.

The main concerns are:

- A major expansion in 4-year Bachelor degrees under the banner of “kick-start”. These are 3-year degrees with an additional foundation first year charged at and around £9,000 per annum. The entry requirements for these courses are negligible. We know this from examples of Cambria students (see examples below). This is a result of their stated “*Entry requirements (of) ... between 80-120 UCAS points. We also take into account any work experience you have that is relevant to a particular course*”. The Glyndwr website also states that “... *you do not have to delay joining the University ...*” implying that it is the only option.

- It is our view that in general, most Bachelor courses should not even be 3 years, but should instead move to being 2 year programmes (as Glyndwr themselves prove is possible). We have also delivered such programmes with them in the past, and more recently with Swansea University, to meet the needs of Airbus UK. This Higher Apprenticeship programme includes study of a BEng over 2 years after the first year of the apprenticeship (which includes an NVQ2 and a Foundation Degree). 2-year degrees better support business and the economy, better prepare students, and provide much better value for money.
- We look forward to seeing the outcomes of the Diamond Review. It is our view that the current funding system for HE study needs to be reformed. Even with the current Welsh Government subsidy for individual learners, many are saddled with unnecessary and unaffordable debt. What is even more concerning is the argument that has been stated which is *“that these students will never have to pay the debt back anyway as many are ‘lifestyle’ learners who don’t want nor need a job”, and additionally, “...for many others doing our social work degrees, there’s no way they’ll ever earn enough to have to pay back their loan anyway”!* As good as learning for learning sake is, if it’s unaffordable, it is immoral to continue in this way. Furthermore, surely the Welsh Government’s widening access policy is not designed to fund HE courses for those who don’t really need them, nor to deliver courses that don’t lead to graduate level salaried employment.
- Finally, there is a growth in the practice offering “unconditional” offers (this is borne out by HESA statistics). These are made to students during their level 3 (and sometimes level 2) study, and inevitably leads to poor outcomes – retention, attainment, and not achieving potential - in FE and in school 6th forms. It is a result of uncontrolled growth of HE places and grossly inconsistent variations in the standards of identical or very similar courses.

Case Studies

Coleg Cambria Pre-Assessment and Course Commenced					4 Year Degree at GU with Foundation Year
A ge	Eng- Maths/Lit- Num	Subject	L	Outcome	
18	Eng 2 - Maths E2	Animal Care	2	Pass not progressed to L3 (grades/behaviour)	Kick Start Bio Sciences
32	Eng 2 - Maths E3	Skills for Further Study	2	Did not complete	Kick Start Psychology
25	Eng E3 - Maths 1	Skills for Further Study	2	Did not complete	Kick Start Psychology
20	Num E3 - Lit1	H&SC	2	Did not complete	Kick Start Care
18	Num 1 - Lit E3	H&SC	2	Did not complete	Kick Start Care
36	Num 1 - Lit E3	H&SC	2	Did not complete	Kick Start Care
18	Num 2 - Lit E3	H&SC	2	Did not complete	Kick Start Care
20	Not known	Child Care	1	Withdrew in first 8 weeks	Kick Start Care
21	Not known	Child Care	1	Withdrew in first 8 weeks	Kick Start Care
22	Eng 2 - Maths 2	Motor Vehicle	2	Did not complete	Kick Start Engineering

WGFY025

Name – David Price

Organisation – Cardiff Metropolitan University

Question 1 - We have outlined a series of concerns regarding foundation year provision principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Summary

1.1 The University does not agree with the analysis. The argument that foundation year provision does not provide any benefits to the students when compared to available alternative routes to higher education is not supported by evidence. The argument that foundation year provision represents poor value for money is premised on an overly simplistic assessment of financial impact.

Detail

1.2 The consultation exercise is flawed as it fails to provide a clear definition of what provision falls within its scope. The data relied on by the Welsh Government in its assessment of the situation are taken from different sources that have very different specifications and are not comparable. This makes the potential scope, scale and impact of the proposals very unclear, and means that the data analysis presented is questionable and very likely misleading.

1.3 It is possible that this situation may be the consequence of one or more factors including:

- Insufficient understanding of the scope and nature of provision offered by different providers.
- Insufficient understanding of the data that are publicly available, including inconsistencies of reporting data.
- Misuse of the data.

1.4 The consultation presents 3-year undergraduate programmes as being the “usual” length of study. This point of view fails to recognise the impact of the development of a mass higher education system and the fact that this led to a vastly more diverse student population. Whilst many students continue to follow 3-year programmes, across the UK there has been an increasing volume taking both 2-year (i.e. compressed) and 4-year programmes. Different models of delivery have been established to meet the needs of different types of student needs. A foundation year taken as part of a 4-year package of learning leading to an undergraduate degree is not an undesirable or unnecessary “additional” year as suggested by the consultation but a necessity for the students in question, enabling them to develop the skills and aptitudes to successfully complete their undergraduate studies.

1.5 The consultation focuses on what is happening in Wales and seemingly fails to recognise that growth of foundation year study is a UK-wide phenomenon. HESA data suggest that there are in excess of 13,000 students taking a foundation, with STEM subjects and Business & Administration studies being the areas of greatest demand. This figure is likely to understate the volume of students as there is a diversity of reporting practices amongst higher education providers. HESA data show that approximately 9% of students taking a foundation year study in Wales and that there are 64 UK higher education institutions delivering such provision.

1.6 The development of alternative models of delivery is likely to accelerate into the future as the student population diversifies further and in response to student demand. It is nonsensical and possibly self-defeating for government to try to control the supply of higher education. Instead its focus should be on establishing mechanisms that enable individuals to access a defined level of publicly backed loans and grants during the entirety of their higher educational studies (i.e. spanning undergraduate, masters and postgraduate study).

1.7 The consultation argues that foundation study offered by higher education providers targets students who may otherwise study in further education but offers no evidence to support this view. Student feedback received by the University indicates that its foundation year provision does not conflict or compete with further education study. It is evident that our students would not study in further education if they were prevented from taking our foundation courses. The University's provision is not displacing student from further education; it is reaching students who would otherwise not engage with any form of learning and study. As such we find the argument that our provision undermines collaboration and partnership between further education colleges and universities as falsely premised. The threat and action of prohibiting universities from offering foundation level provision would run the risk of destabilising existing partnerships between universities and further education colleges, creating competition where none currently exists. The University has formal and highly structure collaborative partnership with two local further education providers. The University is developing new collaborative provision for these colleges. Neither college has indicated that the University's foundation year provision is impacting their further education level operations, and neither has requested that the University's foundation year should be franchised to them. We are not at all surprised that this is the case, as the costs of so-doing would be highly prohibitive for a further education college. This matter is discussed in more detail later in this document.

1.8 The consultation states that there are disbenefits to students taking a foundation year (adding financial burden), yet provides no evidence to substantiate that view. Additionally, the consultation states that the benefits of a foundation year to students are unclear, in the process apparently ignoring published evidence to the contrary .

1.9 Cardiff Met students taking a foundation year do not perceive that they are burdened by extra debt. Indeed student feedback clearly indicates that the ability to access financial support that is available through full-time higher level study rather than the more limited support that can be accessed in further education is a very important consideration in student's decision making process, as it enables them to study full-time and so complete their studies earlier than would otherwise be the

case. These factors can be critical for certain categories students, particularly those that are mature or disabled.

1.10 The benefits for students in taking a foundation year have already been expounded in the background given on Cardiff Met's In summary such provision provides the following benefits to students:

- It provides a 'second chance' to access higher education.
- It is attractive to certain categories of students that are under-represented in higher education.
- It provides students with the skills (e.g. specific academic skills and independent learning skills) and experiences (access to the quality of higher education staff, equipment, support services and the wider higher education student experience) that prepares them to succeed in their undergraduate programme.
- It enables students to access full-time higher education financial support and so complete their studies more quickly than through other routes.
- It gives students full access to the breadth, quality and ethos of studying in a higher educational setting, and the benefits of the wider student experience gained through a higher educational environment.
- It enables students to undertake the whole of their learning programme within a single organisation, providing a more simplified and certain route through higher education than through dealing with multiple organisations.
- The rates of drop-out and attainment compare favourably with students recruited directly on to 3-year undergraduate programmes.

1.11 The consultation claims that foundation year provision raises value for money concerns. It appears that this contention is premised on the impact on student debt (which has already been addressed – and refuted - above) and the costs to Government of student grants for tuition fees and maintenance, and the subsidising of loans. The consultation also suggests that similar courses/provision could be delivered in the further education sector at a lower cost than in universities. The financial assessment offered by the consultation is highly simplistic and fails to take account of the whole cost of delivery and wider costs.

1.12 The content of the foundation year courses offered by Cardiff Met is not available within the further education sector. If regulations were introduced that 'forced' the foundation year to be delivered in a further education setting, the colleges in question would be unable to deliver STEM related content without significant investment in equipment and laboratory/specialist space. They would probably also need to invest in library and student support services. Given the funding differentials between higher and further education it is unlikely that these things will be affordable to further education colleges. If further education colleges were provided with funding at a higher level to enable them to afford the investment required they would duplicate the resources and equipment base already available within the University. This would be inconsistent with a key principle of public policy – i.e. securing for money. Furthermore, a foundation year plus undergraduate course model premised on the delivery of the former within the further education ignores the true cost of collaboration and the reality that further education colleges rely on the infrastructure of universities in terms of dealings with a large number of regulatory and professional bodies. Any erosion of the financial position of

universities as a consequence of foundation study being allowed only in a further education setting would inevitably raise questions about the affordability of other collaborative provision and run the risk of universities insisting on charging their partners the true costs of administration and moderation.

1.13 The consultation offers no assessment of the impact of the cessation of foundation year study within universities. Our evidence is that students would not opt to study a foundation course in a further education environment. It is reasonable to conclude that a significant number of students would be 'lost' to the University. This would erode the viability of some 3-year undergraduate degree programmes, particularly those in STEM subjects which are characterised by lower student numbers and high equipment costs. It is possible that some programmes would need to be closed. Irrespective of whether it proved necessary to close programmes, staff redundancies and an erosion of the equipment case would be certain to happen. Depending on the option implemented by the Welsh Government, it would be necessary to reduce the University workforce by up to 100 academic and support staff. We observe that the financial importance of this type of provision to certain universities is considerable, and that 3 of the 4 options presented in the consultation stand a good chance of creating financial instability that could result in some universities becoming financially unviable. We hope that this is not the intention of the consultation exercise and that the Welsh Government did not have sight of this implication when it started its exercise.

1.14 The consultation offers little assessment of the financial impact of the options outlined in the document for individual students. It focuses on student debt (which we have already addressed earlier), and makes no attempt to evaluate the impact on students' future earnings or their reliance on benefits.

Question 2 - Which of the four proposals do you think should be implemented? Why?

Summary

2.1 Option 1 (status quo) should be implemented.

Detail

2.2 It is unclear what provision is included within the scope of the consultation. Until this matter is clear, the Welsh Government is not in a position to know what the impact of any other options (i.e. other than the status quo) would be.

2.3 The evidence of the benefits of the currently arrangements is overwhelming. There is no evidence that the alternatives would be preferably or indeed that they would be beneficial other than in the narrowest sense of reducing the level of Welsh Government's support for student loans and grants. The level of that reduction would be very small within the Welsh Government's overall student support budget, and could be achieved in simpler, more equitable and considerably less deleterious ways.

2.4 The consultation suggests that option b (reduced level of financial support for foundation study) would more accurately reflect the cost of the provision. This viewpoint appears to be premised on the assumption that foundation level study in a university environment necessarily equates to foundation type study that is or could be made available through further education. As previously stated, the foundation year delivered by a university gives students access to the high quality of staff, support and equipment that is available within a higher education setting. Higher education level fees are needed to provide a higher education level experience.

2.5 The consultation document recognises that option c is flawed as it would represent a departure from acceptable policy and would offer a partial approach. We concur with that viewpoint.

2.6 As previously explained in this response, ceasing support for foundation year study within higher education would be detrimental to the interests of students, would jeopardise the viability of STEM and other important higher education provision, and would undermine the financial sustainability of Welsh universities. The option would create untold damages to the opportunities afforded to Welsh students. In effect it would run the risk of being perceived by students as representing a form of government sponsored discrimination, as Welsh students would be prevented from taking a foundation year within an undergraduate programme whilst English students would continue to be able to benefit from this provision within Welsh universities.

2.7 Should the Welsh Government decide to pursue any of options b, c and d despite the damage that these would cause, implementation should not occur in 2017/18 as suggested in the consultation. The University has already started recruitment for that year and entered into contractual obligations with students. Any new arrangements should not be implemented until academic year 2018/19 at earliest.

Question 3 - Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

Summary

3.1 No.

Detail

3.2 As previously mentioned the consultation fails to communicate what provision falls within its scope. The “definition” referred to in paragraph 30 of the document is not a definition but a list of factors that might be used to set criteria which can be used to evaluate whether provision falls inside or outside a definition.

3.3 At face value it appears that the consultation has failed to recognise the diversity of provision available through foundation year arrangements. Accordingly, there is a high probability that any changes will be imperfectly targeted and result in unforeseen and potential undesirable outcomes.

3.4 It is not clear whether the intention is to make changes that would impact on Welsh & EU students studying in Wales only, on Welsh & EU and other UK (i.e. English) students studying in Wales, or on Welsh students studying in Wales and elsewhere in the UK.

Question 4 - What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

Summary

4.1 Ceasing support for foundation year study in higher education will impact negatively on widening access.

Detail

4.2 The information provided in the Background section above indicates that the University's foundation provision recruits disproportionately from the following categories of students:

- Those from under-represented background.
- Disabled students
- Non-white students.
- Older students.
- Male students.

4.3 These categories of students would be adversely impacted if they were prevented from taking a foundation year at the University. Student feedback shows that in such circumstances students would not opt to take a foundation year in a further education college and would – in effect – be prevented or highly constrained from being able to pursue higher level study. Instead they would consequently need to choose either to not pursue any form of learning/study or would seek to take a foundation year in an English university (if that was permitted by student finance rules).

4.4 Students from the most deprived backgrounds (i.e. Community First cluster areas) without a family experience of higher education and older students are likely to be impacted most. Evidence demonstrates that students from deprived backgrounds have been prone to higher rates of drop-out at university, and that the rate of drop-out reduces significantly when students undertake a foundation year study within a university. These students are characterised by a family and social upbringing that makes it more difficult for them to adjust to the requirements of independent study and living. A foundation year within a higher education environment helps overcome these barriers. As previously stated in the first section of this response, the retention of students who accessed undergraduate study through a foundation year compares favourably with those recruited directly onto 3-year undergraduate programmes.

4.5 Older students are less likely to wish to study in a further education environment as they want the 'grown up' atmosphere of a university.

4.6 The consultation document inaccurately describes foundation study delivered by higher education providers as causing unwelcome competition in relation to the achievement of widening access goals. It represents universities' involvement in foundation study as being primarily motivated by a desire to increase student recruitment. In common with much of the document, no substantive evidence is provided to support these assertions. The consultation does include a highly selective reference to research undertaken by WISERD which is presented out of context.

4.7 As previously mentioned in the background section to this response, the foundation year is an important component of the University's widening access framework. Many students access the University through a free 'taster' sessions and the University's Summer School before deciding to enrol on a foundation year and then progressing to undergraduate study. Removal of one component of this structure would damage the overall programme of work. As one of our students has said:

"I cannot express how much the course changed my life. I was a single parent stuck on benefits with no hope of progression. I had tirelessly been working hard towards a future but walls were put in my path at every turn. Then came the summer school class and the opportunity to get into University to study the foundation course. I am not ashamed to say I cried for two days in disbelief and joy when I realised everything I had done till that point had paid off. This course for some is a lifeline – a game changer."

WGFY026

Name – Ben Arnold

Organisation – Universities Wales

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

4.1 We strongly disagree. We think that the concerns of the previous Welsh Government administration has not been informed by robust evidence, and a better knowledge and understanding of the nature and contribution of this type of provision is likely to lead to a very different assessment of its value.

5. Scale, growth and competition

The scale of current foundation year provision in Wales

5.1 The Welsh Government's presentation of its data is potentially confusing, and appears to exaggerate the extent of the provision compared to overall student numbers. In paragraph 6 (and Table 1) the Welsh Government identifies that there were 1,179 full-time Welsh domiciled students studying in Wales on programmes with a foundation year, based on SLC data. However, this analysis includes students from all years of such programmes not just those on the foundation year. The actual number of foundation year students that the Welsh Government provided support for in 2013/14 was considerably less. In paragraph 7, the Welsh Government's Figure 1 indicates that the number of full-time Welsh-domiciled students on a foundation year in Wales in 2013/14 was around 615.

5.2 In terms of scale, this is less than 1% of the total number of Welsh domiciled students studying across the UK which totalled 100,085 according to the Welsh Government's own statistics in 2013/14, when all modes and levels are included (as they are in the foundation year figures).² In 2013/14 there were 129,130 students studying at universities in Wales.

5.3 The presentation of the data from the Higher Education Statistics Agency (HESA) in the consultation document is incomplete and potentially misleading in a number of respects:

- Its discussions in paragraphs 6 and 7 of the consultation document used mixed sources, different years, and different data specifications.
- It ignores the substantial number of students from the rest of the UK and overseas that could be potentially affected by the proposals.
- The Welsh Government has only presented HESA data where students have been specifically marked as on a foundation year or year zero of a programme (which from here we refer to as a 'HESA foundation year analysis'). However, there are some programmes, which appear to fall within the scope of the proposed changes, which for a variety of reasons, were not recorded in the HESA data in this way. This includes for instance, degrees

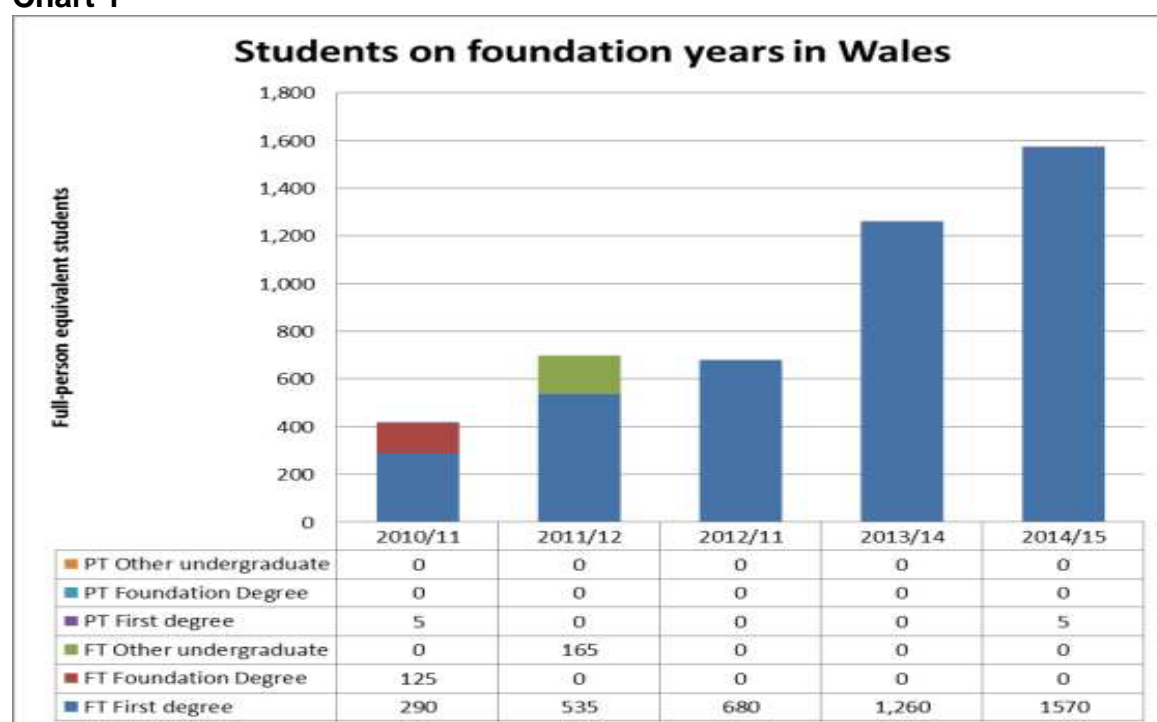
recorded with an extended or enhanced pattern of study, and some 4-year programmes, where students recorded on year 1 are effectively doing their 'preliminary' or 'foundation' year.

- Perhaps because the Welsh Government has relied on the foundation year analysis, it appears to have overlooked part-time provision. Most, but not all, is full-time undergraduate level, according to our research. The Open University in particular provides a distinct distance learning mode of delivery in its part-time level 0 offer, with around 300 students studying on a modular basis (rather than for a full academic year equivalent) in 2015/16.

5.4 From our research it is clear that almost all institutions in Wales offer foundation year provision or equivalent. The Welsh Government will need to conduct more careful research and analysis, however, if it is to gauge the scope and scale of the impact of these proposals accurately.

5.5 According to HESA foundation year data there were around 1,570 students on foundation years in Wales in 2014/15 (see Chart 1) of which 795 were from Wales (see Chart 4).

Chart 1

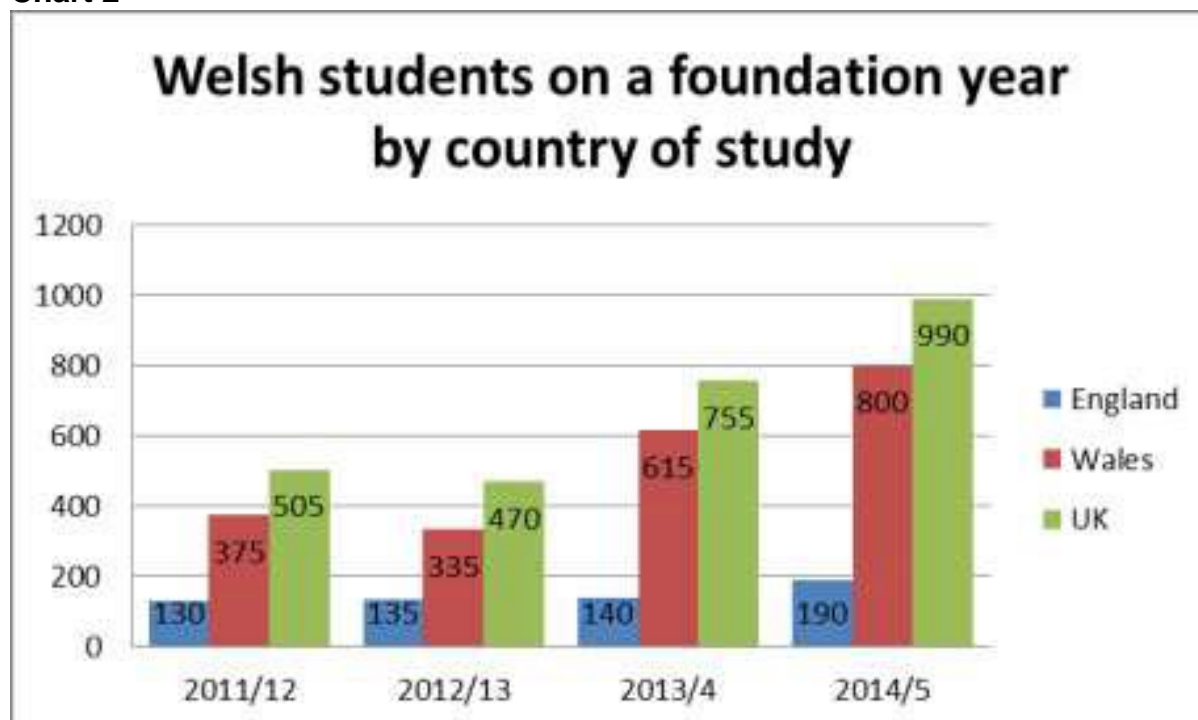


5.6 In addition to the student numbers identified by the HESA foundation year analysis, we currently understand, for instance, that there are around 95 further enrolments on year 1 of full-time 4-year degree programme, and 60 enrolments on undergraduate full-time degrees with an extended/enhanced pattern of study that are likely to be equivalent for purposes of changes to the student support arrangements. This provision is entirely in science, engineering and technology subjects. There are also around 300 students on distance learning part-time provision (see 5.3 above).

Growth

5.7. The Welsh Government indicates that foundation year provision at universities is growing. This appears to be based on the limited evidence provided in paragraph 7 (figure 1), which only looks at years data up to 2013/14 (and not all foundation provision as discussed above). The HESA foundation year data is now available for 2014/15 as well (see Chart 2), and does appear to confirm recent growth in the number of students on foundation years in Wales.

Chart 2



5.8. This data makes it clear that the growth is not just at Welsh universities, however. In fact, the largest percentage increase in 2014/15 was of Welsh students going to England (36%). In other words, there appears to be a growing student demand for foundation provision at universities across the UK.

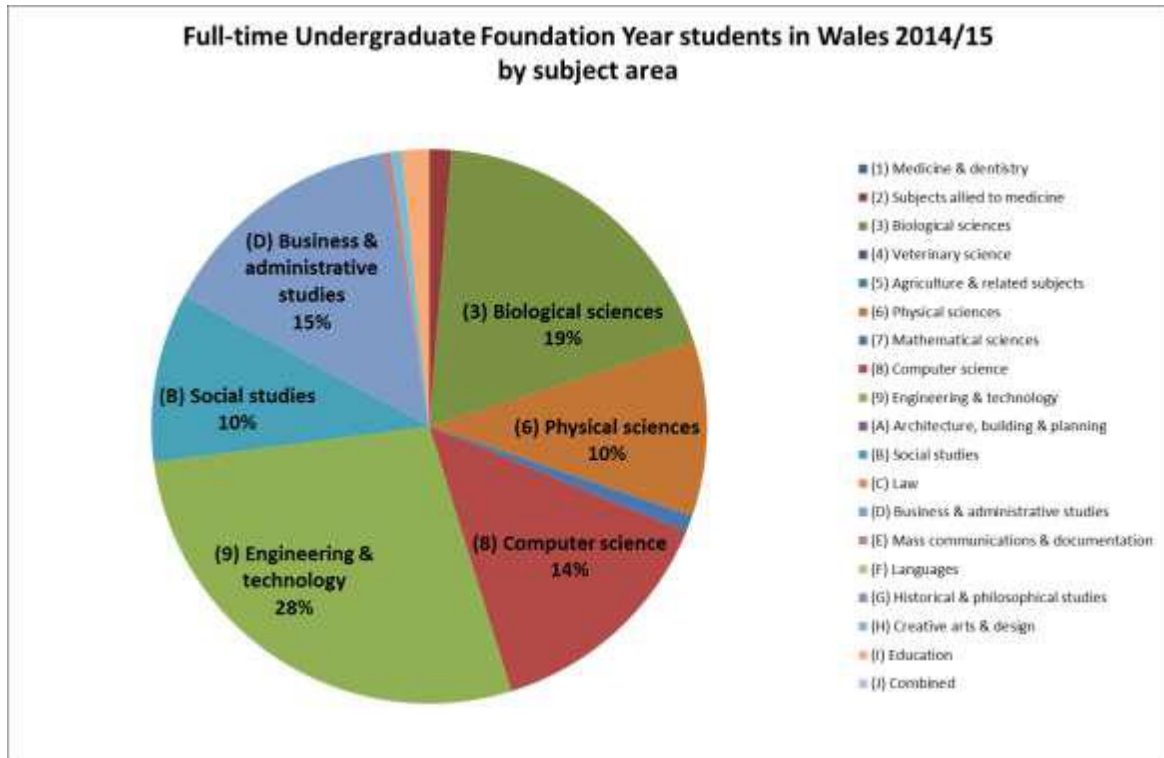
5.9. The HESA figures also need to be read with caution. We understand from universities that a significant part of the apparent growth in courses and some of the growth in numbers may be due to changes in coding practice, partly to accommodate new SLC requirements, and apparent rather than real. In addition, the programmes not covered by foundation year analysis appear to have been far more static in terms of numbers.

5.10. From our discussions it appears that some universities are expecting some further growth in 2015/16. However, we would expect this to primarily come from increasing numbers on existing programmes rather than new programmes.

Subject and student profile

5.11. Currently, foundation year programmes in Welsh universities are overwhelmingly provided in science, engineering and technology (see Chart 3). This includes in particular Engineering and Technology (28%), Biological Sciences (19%), Computer Science (14%) and Physical Sciences (10%). Only a quarter of provision is in other subjects.

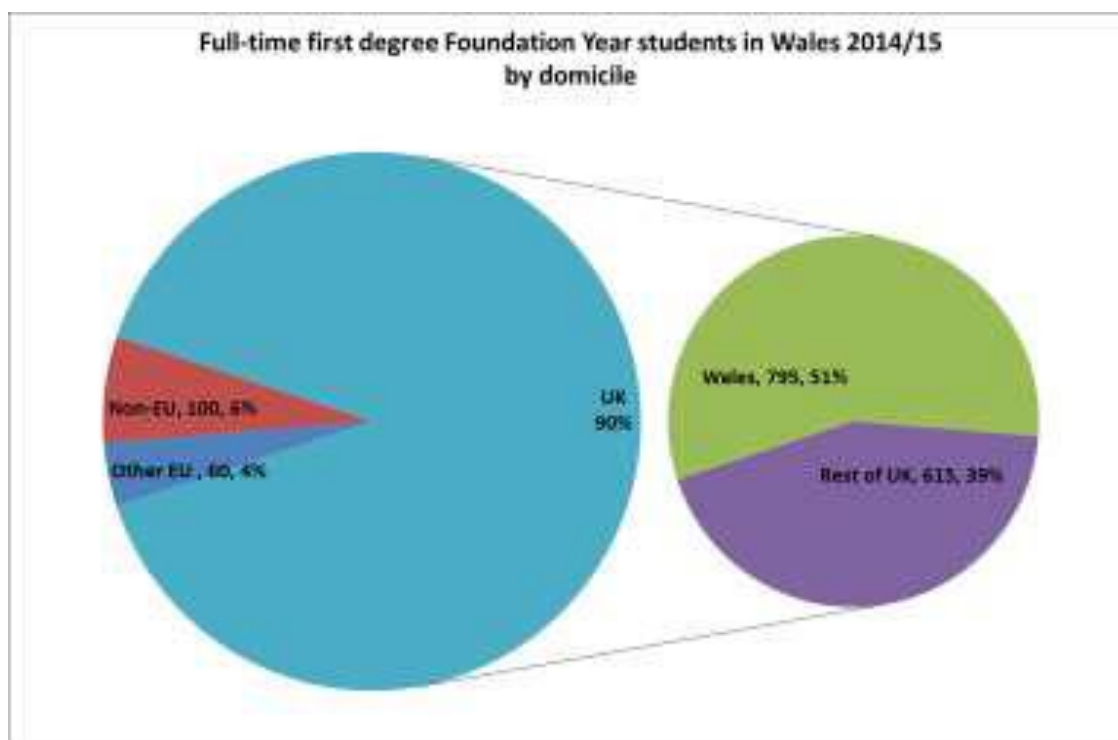
Chart 3



5.12. This percentage is even higher when our estimates of the additional provision (not fully captured by HESA in this analysis) are factored in, since it appears to be all in science, engineering and technology subjects, subjects which typically require significant capital outlay in specialised facilities and equipment, and a learning environment and support infrastructure which is tailored for such students to cope with typically very demanding and intensive study.

5.13. In addition to the Welsh students, there are a significant number of students from other countries. In fact, Welsh-domiciled students accounted for around half of students only in 2014/15.

Chart 4



6. Benefits for students

6.1. In our view the Welsh Government has completely undervalued the benefits and value for money of a foundation year at university, and there is a strong policy rationale for continuing to support and encourage foundation year provision in universities.

Student choice

6.2. First and foremost, in our view, the removal or reduction of support for foundation year provision would mean a significant loss of choice and opportunity for students. Students consciously choose to study foundation/integrated provision at universities, despite the fee loan debt that the student incurs.

6.3. To remove or reduce the provision would also appear to be contrary to the Welsh Government's own policy principles as expressed in relation to the current student support package: "Our tuition fee policy is based on the fundamental principle that the choice of institution and course for Welsh students should be driven by individual circumstances and need."

6.4. We recognise that the higher education environment and provision is not the right option for every student, and welcome alternative provision that caters for them. There is clear evidence from research conducted by the universities which these students attend, however, that many students believe that university provision better suits their individual circumstances and need, despite the greater cost to them.

6.5. Universities in Wales have conducted a considerable amount of research into the reasons that their students choose to pursue foundation year study with them and the perceived benefits, as can be seen from their individual submissions. Students typically cite, for instance, superior facilities, university tuition and an environment which is better suited to them. By contrast, some specifically commented that the further education environment was not right for them, and saw it as too geared towards young students. Some indicated that they would be less likely to have pursued their study at a higher level without the foundation year. As further discussed below, many of these perceptions appear to be supported by other evidence.

6.6. For some institutions a significant proportion/number of students enrolled on these courses come from outside Wales – and in particular would be unlikely to apply to further education providers instead.

University environment and facilities.

6.7. Many students appear to place a high value on learning in an higher education environment as opposed to a further education environment, and typically benefit from university facilities.

6.8. Universities account for more than half of all research and development in Wales, and have a large and thriving portfolio of world-class research. Students typically benefit from the large-scale investment in top-class subject specific facilities that are necessary to support this world-class research and innovation.

6.9. Particularly for STEM subjects, there is significant investment in HE facilities and infrastructure, which further education providers cannot currently match and would require significant investment over many years to obtain. Given that the facilities already exist in universities, these programmes are most likely to be provided cost effectively at universities.

6.10. Student facilities and support benefit from the size of the higher education sector and from the fact that, in addition to public funding and fee income, universities have been able to generate and reinvest a significant amount of income from other sources.

6.11. From our discussions with universities it is clear that all provision is being taught by higher education lecturers (even when the provision is level 3), and is not being franchised out. This means, typically, that students have access to research active staff and remain at the forefront of their subjects and professions.

Integrated learning/learning environment.

6.12. Currently, from our research, it appears that foundation year provision in Wales is in many instances a mix of level 4 (HE) and (FE) provision, which means that it is not equivalent in level and content to provision within further education. None of the provision is franchised to other providers and all provision is taught with higher education staff in a university environment, with access to the full range of university facilities and support.

6.13. Many students specifically appear to want and benefit from bespoke/integrated programme of learning. They do not want to have to apply separately to enrol at different providers and have courses that do not integrate seamlessly or provide the foundation for later study in their subject so well.

6.14. A key feature of learning at university is the diversity of the student body and the global outlook. In contrast to the further education sector, a significant proportion of the student body comes from outside Wales, and from overseas, providing an important international perspective. Just under half of all students on foundation years on full-time first degrees for instance are from outside Wales (see Chart 4).

6.15. Teaching and learning at universities in Wales is informed by a significant body of worldclass research, which continues to shape and invigorate the subjects which are taught at undergraduate level.

6.16. It is clear from the universities research that students value the quality that is associated with higher education provision, and believe that universities – at least for their needs – can offer a better teaching and learning experience. Higher education in Wales has a strong reputation for teaching quality, and is very strictly regulated in terms of the quality of its provision by the Higher Education Funding Council for Wales (HEFCW) and the Quality Assurance Agency (QAA), as part of a UK wide system. A range of UK wide information sources provide students with good information on the quality of education at each university including satisfaction levels, completion statistics and employment outcomes. Statutory measures such as the student complaints procedures and the powers of the Office of the Independent Adjudicator provide students with additional protection. As charities, all universities in Wales are also subject to the additional regulation of the Charity Commission.

Widening access

6.17. The assertion in the consultation document that foundation years are contributing little to the widening access agenda appears to be based on little or no evidence. Contrary to this assertion, the HESA data appears to confirm that foundation year or equivalent provision makes a very significant contribution to the widening access agenda.

6.18. We understand from HESA data for 2014/15, for instance, that out of the 725 Welsh students on full-time first degrees new entrants on a foundation year around:

- 29% (215) were from Communities First/Welsh Index of Multiple Deprivation areas, about 6 percentage points higher than for new entrants not on a foundation year.
- 44% (320) were from low participation neighbourhoods, a percentage point higher than students not on a foundation year.
- Foundation programmes attract a high percentage of older students. Over a third (37%) were aged 21 or over, compared to around 29% for those not on foundation year.
- A high proportion on foundation years were male - 62% compared to 39% of new entrants in year 1.

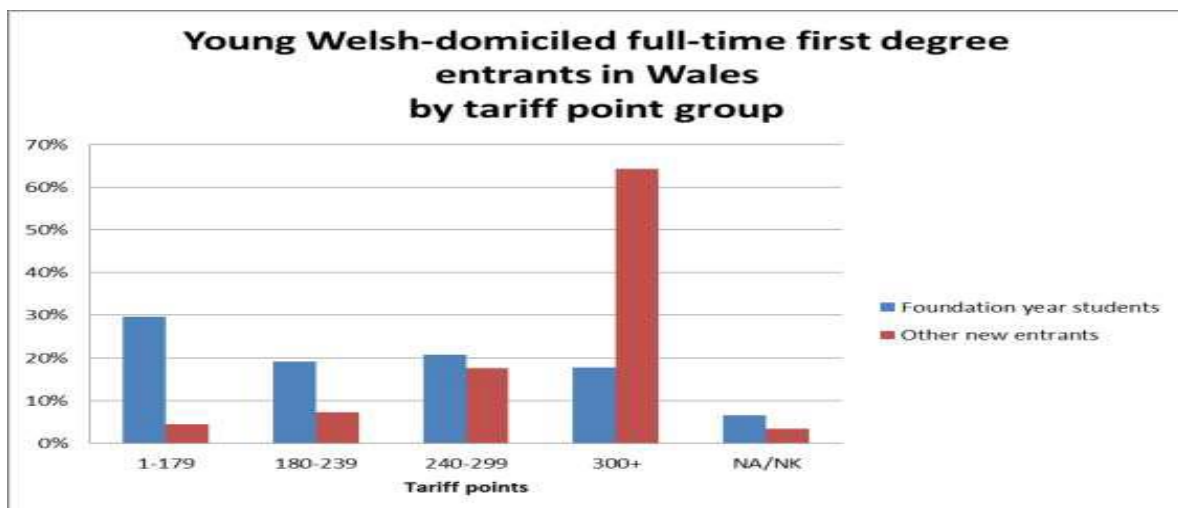
6.19. On the last point, we note in particular that the study on underachievement of young men published by the Higher Education Policy Institute (HEPI) suggests that foundation years recently could be of particular benefit to male students who currently appear to be underrepresented and under-achieving in higher education, and that the take up of foundation year provision should be encouraged.

Progression and achievement

6.20. From the evidence that we have been able to identify, foundation year programmes appear to be notably successful at improving student achievement.

6.21. The HESA data shows that, although there is considerable range of levels of achievement prior to enrolment, a comparatively high proportion of foundation year students have lower levels of attainment than other entrants. 4% of new entrants on foundation years did not hold A-levels (or HE qualifications) compared to 1% of other entrants. The following chart illustrates this for Welsh-domiciled students under the age of 21 with A-levels.

Chart 5



6.22. Despite the lower average prior attainment, it appears that the completion rates for foundation year entrants and other entrants are almost identical, with overseas students in particular benefitting from the foundation year (a completion rate of 95% for new entrants on foundation years, compared to 87% for students who did not have a foundation year).

6.23. The most significant benefit, however, appears to be in terms of the degree outcome. We have not been able to analyse this in the foundation year data, but if we look at the HESA data for extended undergraduate degrees, for instance, (albeit a small sample of only 60), it appears that 100% of students in 2014/15 achieved a first or a 2:1 in Wales, compared to the 66% for students on first degrees without the extended year. A very high proportion of firsts and 2:1s is also seen in previous years. A number of the individual submissions from universities have also highlighted that this appears to be the case at their institutions.

6.24. This is not surprising for policy makers. Evidence in academic literature and formal studies, albeit rather limited, also appears to support these findings. For instance, separate studies in other countries have also found that students on foundation years perform better than students who enter a programme directly.⁶ One of the studies concludes that the foundation programme has a far-reaching effect on all aspects of the students' lives and not only on their academic performance, highlighting that students themselves place great importance on the non-academic benefits of study in HE.⁷ Many of the key studies on student attrition and retention in higher education, have frequently stressed the importance of a wide set of factors for successful continuation of study which suggest that, for some students, easing the transition into HE in terms of coping with the learning environment and non-academic aspects of HE study could be critical.

7. Cost and value for money

7.1. The Welsh Government's assessment of the value for money appears to be flawed. In our view, the reduction or removal of foundation year provision at universities is unlikely to ease pressure on the Welsh Government's funding. If it does not result in the loss of students from the higher education system altogether, it is more likely to require significant sunk investment costs in higher cost substitutes (where further education colleges are able to offer it all). It is also likely to undermine STEM provision at other levels in universities.

7.2. In terms of the budgetary implications for the Welsh Government we note that enrolments on full-time undergraduate programmes overall have not grown over this period in Wales (and were subject to student number limits/maximum fee grant controls until 2014/15). There is evidence in universities individual submissions to suggest that it is other forms of higher education provision rather than further education provision that are most in competition with foundation year provision in universities (see below). This means that growth on foundation years programmes at universities has had little or no net effect on the Welsh Government's student budget overall.

7.3. The consultation document suggests that provision through further education providers would be cheaper. However, this ignores the very significant cost of investment that further education providers would have to make to provide equivalent provision/facilities, particularly in STEM subjects.

7.4. As confirmed by the UK Wide costing exercise (TRAC), provision in science, engineering and technology areas is typically very expensive, and is not even covered by the maximum full-time undergraduate fee level of £9,000 at the moment, i.e. universities are effectively subsidising it. As identified above, nearly three-quarters of students on foundation years are studying in these areas, and more if equivalent provision is also taken into account. The subject related costs of teaching appear to range from around £8,840 to £15,400 for STEM subjects in these areas in today's prices.

7.5. We should also note that due to current fee plan legislation, universities can only use around 70% of their additional fee income to meet subject-specific teaching costs, i.e. the teaching income is limited to around £7,500. However, in addition to the universities investment in its teaching provision, 30% of the additional income is invested into widening access and promotion of higher education.

7.6. TRAC data would suggest that the costs of teaching provision are lower for the two main non-STEM areas, administrative and business studies and social studies – around £6,940 and £6,480 respectively. However, there is typically variation within these categories and the actual cost base of individual programmes could vary significantly. It should also be noted that the TRAC analysis only relates to the subject-specific teaching costs, and the wider costs associated with teaching, and other institutional costs are not included, as would be necessary for an assessment of longer-term sustainability.

7.7. Providing foundation year/integrated provision within higher education, means that it currently benefits from critical mass and economies of scale. Enrolments on foundation programme from students across the UK and overseas, which universities are particularly good at attracting, means that these programmes have a greater chance of being sustainable – as well as bringing valuable inward investment into the Welsh economy. In addition, universities benefits from more general economies of scales, such as greater purchasing power and procurement efficiencies.

7.8. There would also be exit costs for higher education, if foundation year provision is scaled back or removed altogether, which could affect university staff as well as students.

7.9. The availability of student finance for Welsh students would affect universities' overall funding and competitiveness compared to other parts of UK. It could simply mean that it drives Welsh students to take up courses outside of Wales and prevents students from outside Wales from enrolling at Welsh universities.

Competition with alternative provision

7.10. The consultation document suggests that higher education providers are offering such provision at the expense of further education providers. Contrary to this suggestion, there appears to be no evidence that these students would or could transfer to further education provided courses instead, or of clear alternatives being offered by further education providers at the moment, or evidence that other providers would wish to make the substantial investment required to offer similar provision. The clear danger is that, if foundation years in HE are removed or reduced, these students would simply drop out of higher education.

7.11. From our discussions with universities it appears that in a number of cases, rather than compete with FE level provision, this provision is competing with other HE level provision. From individual submissions it can be seen, for instance, that programmes with a foundation year have taken over from 2+2 arrangements and other higher education alternatives.

Question 2 – Which of the four proposals do you think should be implemented? Why?

8.1. In our view the Welsh Government should continue to provide the current support (Option A). As evidenced above, we believe that the consultation document is wholly mistaken in its assessment of the cost and value of the provision of current foundation year provision.

8.2. Removing support for foundation year (Option D), as argued above, would be a significant detriment for a small but important group of students, denying them the choice that the fee grant was designed to retain, and a route through higher education that offers, for them, the best chance of success.

8.3. Option B, reducing the level of fee support, would increase the difficulty of covering the cost of such provision, particularly given the extent of STEM provision, and place the long-term sustainability of these opportunities for students at risk. There is no evidence to suggest that the cost of provision of foundation years is less than for other years. In some instances, it has been brought to our attention that foundation year courses in universities in Wales are already offered at a lower rate than other years by providers. However, it should be stressed that foundation years are in general subsidised by providers. An analysis of teaching costs by subject points to the fact that the large majority of this provision must be subsidised by the provider even at the £9k fee level.

8.4. In our view, there are particularly strong arguments in favour of retaining full support for STEM subjects (Option C). The contribution of foundation year provision for STEM subjects in particular should be recognised, and provision actively encouraged in line with the science for Wales agenda.

8.5. There are also very good grounds, however, for continuing to allow students to choose foundation study at university in other subject areas. Removing or reducing support for these areas will deny opportunities for students for whom a foundation year at university best suits their needs. Foundation year study in non-STEM subjects currently comprises a low percentage of foundation year study, which in itself accounts for a very small proportion of overall full-time undergraduate study (less than 2%).

8.6. We wonder if there are any real savings to be made in non-STEM subjects given the small numbers, particularly when this is offset by the potential costs of implementation of a policy which attempts to differentiate courses on the basis of subject categories. Implementing a policy based on the subject area classification is unlikely to be straightforward or without administrative cost for either the Welsh Government or the HE sector. Courses rarely fit neatly into coding categories, even though this must be done for data purposes, and the nature of provision can vary significantly within categories. This means that in some instances the classification could lead to rather unfair decisions for students.

8.7. Since overall student numbers are monitored, and have been made subject to student number controls in years that the Welsh Government has felt necessary, it is misleading to suggest that the cost of the foundation year provision is additional to the Welsh Government. Such provision has a negligible effect on the full-time undergraduate numbers overall.

8.8. We can see no evidence that Options B to D would deliver the savings identified by the Welsh Government.

8.9. In light of the Welsh Government's concerns, however, we recommend HEFCW keeps growth and fee levels in non-STEM foundation year courses under review. As with all courses, we would expect HEFCW to continue to approve fee plans where fee plan commitments reflect the levels of fees charged for programmes.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

9.1. No. Paragraph 30 does not provide a definition. It only indicates that “a definition is likely to consider the interaction between: the attainment of the student; the level of the provision; and the additional period of study.”

9.2. It is in fact very difficult to ascertain from the rest of the document, precisely what provision and definitions the Welsh Government has in mind. The closest the consultation comes to offering a definition is when it refers to ‘foundation years which extend the duration of some undergraduate degrees by adding a year of study’.

9.3. It is unclear, for instance, whether the Welsh Government is including just undergraduate courses. The text only refers to undergraduate degrees, but confusingly in Figure 1, for instance, the Welsh Government has chosen to include both undergraduate and postgraduate courses. For the purposes of this consultation, we have assumed that the Welsh Government is currently only looking at undergraduate courses, since the set of considerations around postgraduate courses or integrated undergraduate/postgraduate courses could be considered to be completely different, and the Welsh Government's concerns as expressed in this document appear to be only relevant to undergraduate courses. There are also significant issues in relation to the professional body requirements and accreditation that would require widespread consultation on any proposed change. If any changes are being contemplated in this respect, however, we would expect this to be made clear and the subject of formal consultation too so that we have an opportunity to comment.

9.4. Similarly, it is unclear whether the Welsh Government intends to review arrangements for part-time provision. Again, we have assumed, based on the indications in the consultation document, that the proposals are intended relate to full-time undergraduate provision. The issues relating to the impact for student support are clearly different for full- and part-time provision, since there has been no comparable fee increase for part-time provision in Wales and students are not supported by tuition grant i.e. the financial support for part-time students is

substantially less than for full-time students at present. Part-time provision in Wales also provides a distinct opportunity for distance learning which is very important for a particular group of students. As for postgraduate study, there are also significant issues in relation to the professional body requirements that would also require widespread consultation. As stated in our comments at the end (see 11.7) and recognised in the Welsh Government's concurrent consultation on postgraduate and part-time support, there is a very strong rationale for increasing support for part-time higher education in general. If any changes are being contemplated in relation to support for part-time provision we would expect this to be subject to separate consultation in the light of the outcomes of the Diamond Review, and it is essential that in the interim no adverse changes are made that could affect foundation year provision or equivalent by part-time study or distance learning.

9.5. See also our comments above under Question 1 (paragraphs 5.1 to 5.13) on the data presentation.

9.6. As we currently understand the student support regulations,⁸ eligible students may qualify for support (i.e. Welsh Government loans or grants) in connection with 'designated courses' as follows:

- Designated courses include full-time undergraduate course⁹ provided by a publicly funded educational institution of at least one year in length up to the ordinary length of the course plus an additional year (plus any repeat years for compelling personal reasons).
- If a student has studied a previous full-time undergraduate (or postgraduate initial teacher training) course, his/her entitlement is reduced for each year of attendance on their previous course. This would appear to mean that a student could be funded for two separate courses at HE level in theory: for instance, for the full duration of an ordinary length degree course (3 years) and an additional year of attendance on a previous/free-standing full-time undergraduate course.
- Students also need to meet a range of individual eligibility requirements, such as UK/EU domicile. Those who already hold a first degree are not entitled to support – unless the qualification was attained as part of the current course i.e. the two awards are considered to form a single course.

9.7. Eligibility for statutory student support under these regulations only extends to higher education level courses. Free-standing further education level provision such as Access to HE courses, for instance, would not qualify for HE student support and fee arrangements.

9.8. Reconciling the student support rules neatly with the data used by HESA, or by HEFCW for funding purposes or, for instance, the National Framework on Academic Standards is not straightforward. The latter, for instance, specifies that programme outcomes should reflect, in a holistic way, the qualification descriptor for the final level reporting data.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

10.1. Removing or reducing support would undo much of the positive impact that a carefully built portfolio of foundation degrees in the sector has offered.

10.2. As discussed above, any policy changes relating to a foundation year or equivalent would primarily affect students on science, engineering and technology provision. This would appear to be at odds with the Welsh Government's delivery of its strategic agenda for science in Wales.

10.3. It would also disproportionately affect students from Communities First Areas, from low participation neighbourhoods, older students, and male students. In other words it is likely to have an adverse impact on the sector's widening access agenda.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

11.1. Finally, the Welsh Government concerns appear to be driven in large part by budgetary considerations. We should be clear that provision that offers a successful transition into higher study in HE should not be placed at risk by a lack of adequate funding for either the further education or higher education sector.

11.2. The lack of participation in Wales at HE level compared to the rest of the UK is arguably the single most important educational issue for Wales now to address. The Welsh Government's most recent statistics showed that 36% of adults of working age in Wales held higher education qualification compared to 39% in the UK as whole – the biggest percentage point gap between Wales and the rest of the UK at any level of educational attainment.¹¹ The most recent analysis of the Universities and Colleges Admissions Service (UCAS) showed that the application rates of 18 year olds from Wales for full-time higher education were the lowest of any UK country at 32.2% – more than 4 percentage points lower than the application rate of 18 year olds in England as a whole (36.6%) and equal to the lowest rate of any region within it.

11.3. Higher education opportunities can have a massive impact on individuals. The further up the educational ladder that a person reaches, the greater the return to the individual and the greater his or her contribution to the economy and society. An undergraduate degree increases an individual's chances of employment, and increases marginal earnings by 27% on average compared to the possession of two or more A-levels. Higher levels of study bring even greater returns on learning.

11.4. It is estimated that over 80% of new jobs created by 2020 will be in occupations with high concentrations of graduates.¹⁴ The UK Commission for Employment and Skills (UKCES) in particular identified significant future demand for corporate managers; science, technology, engineering and mathematics (STEM)

professionals; teaching and research professionals; and business and public service professionals.

11.5. The Welsh Government needs to find ways of supporting effective routes into higher education offered both universities and others to allow students to make the choices that are right for them. All forms of viable provision which successfully cater for the individual needs and circumstances of students should be encouraged in this respect.

11.6. Work on addressing the shortage of skills needed to succeed at higher levels of education needs to continue at schools and further education colleges as identified by the Welsh Government in Science for Wales in particular. In short, the Welsh Government needs to deliver on its commitment to its strategic agenda for science in Wales¹⁵ by investing in science education in all sectors. It should also apply the fundamental principles it outlined in establishing its current student support policy to enable student's to have a choice.

11.7. In addition, the current support for growth in part-time provision, including foundation years, represents a major missed opportunity. Part-time provision is particularly suited to enable access and participation in higher education by students from all backgrounds and circumstances. Greater parity of support should be extended to enable foundation year provision. We hope that this will be addressed through the outcomes of the Diamond Review.

11.8. In the light of the above evidence, we believe there will be significant difficulty for Ministers in communicating the value of the proposed removal or reduction of foundation year support at universities to Welsh students faced with difficult and important decisions about their future careers and route through education, often at time of clearing, who will wonder why applicants from other parts of the UK are able to access support for study in Wales or elsewhere in the UK when they are not.

11.9. We are happy to confirm that this response may be made public, on the internet or in a report.

WGFY027

Name – Judith Davison

Organisation – University of Huddersfield

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Disagree

We do not agree with the analysis presented. In our experience, Foundation Years provide a valuable route for access to degrees in STEM disciplines for students who would not otherwise be able or willing to access them. They do so by overcoming a variety of academic and socio-economic barriers. Students may bring academic qualifications which, although they prepare them for study at level 4 and above, do not provide the grounding required for the intended degree. Other students will bring extensive life- and work-experience, which would again prepare them for study at level 4 but similarly do not offer the relevant grounding. Yet again, some students will bring employment-related skills which fit them well for the particular degree that is their goal, but without the academic context to allow them succeed when beginning at year one of the conventional degree. Many students have had challenging experiences of school and college, and further time in such settings is no longer appropriate; the special skills of an institution like Huddersfield with its track-record in professional education with a widening access focus are required. 95% of the Huddersfield students who undertake a Foundation Year are in work or further study six months after the end of their course (HESA DLHE data).

WGFY028

Name – Greg Walker

Organisation – Colegau Cymru

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

1. The role of foundation years has changed in the last 20 years from a small-scale and niche route into higher education in a narrow range of subject areas to being a key recruitment tool for universities seeking to hit their recruitment targets for students in a competitive higher education market. This is the fundamental reason why the current finance system for foundation years has to change. Because of this fundamental change over time, foundation years now provide significant and direct competition to FE colleges in providing level 3 education in Wales.

2. It is not a coincidence that the rapid growth of foundation years has taken place since the introduction of £9,000 tuition fees in Wales. Universities in Wales are able to charge up to £9,000 for this foundation year provision and students on these programmes can claim the normal HE full-time student support regime. This is a regime more generous than that for FE level 3 students.

3. This is problematic not least because it is not part of any university strategic plan that we can identify that the institution sees its mission as being a provider of level 3 education. The rapid growth of foundation years is therefore a knock-on effect of the policy of the UK Government in England to marketise post-compulsory education and skills provision. The Welsh Government, in contrast, has sought to pursue a further and higher education and skills system that avoids nugatory competition and duplicative provision. This imperative of avoiding duplication and unproductive competition is all the more important given the effects of sharply reduced budgets in post-compulsory education.

4. Level 3 provision in colleges is precisely designed to assist students progress into higher education or employment. Welsh Government provides funding of between £3,000 and £3,500 a year for such programmes. Students would not have to pay for an FE level 3 programme by paying fees and getting into debt. Students can apply for Assembly / Welsh Government Learning Grant for this provision and younger students can claim Education Maintenance Allowance to support them during their study. Until 2015/16, a broad range of part-time adult skills programmes were available for over 19 year olds in FE colleges in Wales.

5. It is therefore a genuine concern to note that at the same time as there has been a significant increase in Welsh Government funding of foundation year provision (at level 3) in universities there has been sharp reduction in the funding for part-time adult FE provision, including at level 3. The net effect of this *de facto* transfer may be to reduce opportunities to those adults who wish to study part-time, due to family or other caring commitments, while increasing the amount of public funding expended on full-time provision.

6. Colleges have an excellent and improving track record in getting students into higher education. A HEFCW commissioned study published in 2012 showed a marked increase in progression from FE to HE in Wales in the previous four years. We would expect this improvement in progression to have continued beyond 2012.

7. A further concern with this so-called 'level 0' study is that the learner does not leave with an accredited qualification after the foundation year if they do not progress to degree study at the university beyond the foundation year. With an Access to Higher Education programme or a FE level 3 programme the student would exit with a accredited qualification that would help them progress to HE level provision at a later point.

8. In cases where a student already possesses level 3 qualifications at a good 'pass' level, but not in the subject area where they wish to progress into higher education, there are good options for the student to study a specific Access to Higher Education programmes that will allow them to study in the sciences or other areas. 'Access to Science' programmes, for instance, are widely available at colleges across Wales. These programmes prepare students for STEM based subject areas. We would also question whether generic so-called 'kick-start' foundation years in universities genuinely help students progress into the STEMM disciplines.

9. For the reasons listed above ColegauCymru believes that scarce public resources used to fund such foundation year provision in universities in Wales via fee grant, student support and the RAB charge may more helpfully directed at:

(i) Access to Higher Education and other similar level 3 courses in colleges or in universities be they full-time or part-time.

(ii) Level 4 and above Higher Apprenticeship provision which has coming on stream rapidly in Wales since 2012.

10. We would expect the result of this reapportionment to be no deterioration at all in the progression to level 4 study for prospective HE students. There is a strong chance that such a reapportionment would increase the flexibility of progression opportunities for students as they would not be tied to a particular course in a single university but would have a qualification that was transferrable as noted in para.6.

Question 2 – Which of the four proposals do you think should be implemented? Why?

11. ColegauCymru believes that option D (outlined below) is the option that should be implemented.

D) Cease support for the foundation year. This would remove support for the foundation year of undergraduate degree courses in the higher education sector but would maintain support for similar courses to be delivered in the further education sector, generally without cost to the learner. Widening access activity would operate as usual.

12. ColegauCymru believes that fee loan and student maintenance support provision for foundation year should cease from 2017/18 for those not already accepted onto foundation year programmes. As they are autonomous institutions, universities may choose to continue to offer foundation year provision for non-Welsh domiciled students. This would preserve their competitive position against HEIs across the border and allow them to attract students from England if that is their wish.

13. To ensure that there is no ‘one off’ impact of the withdrawal of foundation year programmes, HE, FE and Work-Based Learning providers in Wales’s three regional learning partnerships should be tasked with looking again at progression routes for people over the age of 21 into work-based higher education, adult-focussed FE mainstream provision at level 3 or Access to HE provision in their regions. This would ensure that a broad range of opportunities are identified for students wishing to progress to higher levels of learning.

14. This work should feed into, and helpfully relate to, the Welsh Government’s Demand and Supply Assessments for skills for each region. This would help ensure that students were assisted in progressing into higher level skills programmes that maximised their opportunities for future employment.

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

15. Yes, the definition provided is useful. Clear reference to so-called ‘level 0’ HE study being considered explicitly as the equivalent of CQFW level 3 study would be a helpful additional clarification within the definition.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

16. ColegauCymru would predict that the 750 students or so who would have otherwise have studied on a foundation year will be able to access widely available alternative level 3 courses that would enable them to take up higher education study. This is especially the case if the monies used to fund foundation years are redirected to mainstream FE or work-based level 3 provision, or to Access to Higher Education provision in either colleges or universities in Wales.

17. This will be better for students in that they will not be bound to progress to a particular higher education programme at an individual university, but would be qualified to pursue a range of potential options including 'earn as you learn' work-based higher education in the form of Higher Apprenticeships. There are now thousands of places available in Wales for work-based learners wishing to start an apprenticeship at level 4 and above. This was not the case in 2011 when the rapid growth of foundation years began. In this scenario, the student will also avoid several thousand pounds of debt, especially if they left the university at the end of the foundation year without a qualification that it recognised elsewhere.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

18. The rapid growth of foundation year provision indicates the weakness of Wales's system for planning and coordinating post-compulsory education and training. This substantial growth in level 3 provision at universities has occurred without any reference to Wales's regional learning partnerships or agreement at them. This expansion has not been raised in liaison between the FE sector and the Higher Education Funding Council for Wales, despite there being fora for the discussion of such matters in formal HEFCW committees (where colleges are represented) or in bilateral meetings that take place between the FE sector and with HEFCW.

19. This situation exposes the clear gap in strategic direction of post-compulsory education in Wales which tends to be filled by provider interests rather than the learner interest. It reinforces the case for much better strategic planning of post-compulsory education in Wales, as set out in the Hazelkorn Report.

20. ColegauCymru also notes that 'level 0' foundation year provision at universities is not subject to Estyn inspections, despite it being *de facto* level 3 study provision. Other level 3 programmes at universities (and colleges), such as Welsh for Adults and Access to Higher Education programmes, are subject to Estyn inspection. This seems to be an inequitable and questionable aspect of foundation year provision in universities and we would question whether this exemption from Estyn inspection for such provision is appropriate.

WGFY029

Name – Mary Van Del Heuvel

Organisation – ATL Cymru

Question 1 – We have outlined a series of concerns regarding foundation year provision, principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis? Why?

Agree

Supporting comments

FE in Wales has seen many changes in terms of mergers and restructures in recent years, so ATL Cymru members are clearly aware of the financial pressure on the FE system.

Many learners have options to study within the FE sectors in Wales that are judged by Estyn as excellent to good and provide better value for money to the public purse.

ATL Cymru members feel the aspect of value for money is further heightened by the imposition of placing at least an additional year of debt upon a learner and the ability to repay surely must be questionable.

ATL Cymru believes it is challenging to accept a level 3 learner will be charged £9,000 when they can undertake an access course free at an FE college.

This model on a local level is targeting the same students who most likely would have undertaken study in a further education college.

If WG is impressed by a “year zero” study programme then many FEIs in Wales can showcase an engineering programme that commences in FE, works with a large employer to progress through to a Higher Apprenticeship programme and HE.

Many colleges also deliver a level 3/4 Foundation Diploma in Art & Design. This is another model of delivery that is viewed as good practice in FE. The results are excellent for retention, outcomes and progression.

ATL Cymru believe any decision should have the best interest of the learners in mind.

Question 2 – Which of the four proposals do you think should be implemented? Why?

Our FE Committee members suggested Option ‘d’ is the most appropriate option.

However, we believe that those students who are currently enrolled on a course in HE must continue to be supported, and would only support this option if the money

were reallocated to FEIs, and that all students were able to access the most appropriate course close to home.

Option 'a' ATL Cymru members believe it encourages duplication.

Option 'b' and 'c' ATL Cymru members wonder if this option was pursued then could FE learners on the same course pursue the same funding?

Question 3 – Do you think our definition of foundation years at paragraph 30 will capture the type of provision we have discussed?

ATL Cymru is unsure that paragraph 30 provides a clear definition to capture the provision.

We believe that it should look at factors such as the:

- attainment of the student;
- level of the provision; and
- additional period of study

Does the course provide subject specific introductory modules relevant to the chosen degree course?

Will the definition recognise additional factors such as?

Literacy / numeracy and English / maths deficits;

The “credit” rating of the foundation programmes;

Age of the learners;

Mature learners that haven't previously accessed HE; and

Loss or no entry requirements.

Question 4 – What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

ATL Cymru is unsure about the impact of widening access on learners, but believe it could be minimised in terms of widening access to HE, providing students are able to access the best course for them through their local FEI, and the funding is reallocated to provide support for those pupils there.

WG needs to give consideration to perhaps the limiting factor of the current age-related restrictions that apply to many FE and WBL programmes for those aged over 25. WG prioritises 16-19 year-olds within its funding to FEI's which might explain some of the growth in foundation years in HEIs.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

We welcome the opportunity to respond to this consultation and can see that the Welsh Government is facing challenges in terms of funding.

However, we believe that those students who are currently enrolled on a foundation course in HE must continue to be supported, and would only support change if the money were reallocated to FEIs, and that all students were able to access the most appropriate course close to home.

We would be particularly concerned that these proposals pre-empt the findings of the Diamond Review which is now looking at FE, as well as HE funding.

ATL Cymru members believe 3% of learners from Wales access a foundation route into HE which is costing at least £8.7m/annum to the education budget. This represents nearly 3% of the budget being deployed to FE Institutions in Wales in 2016/17. This is based on the 1,683 full time students on courses that have a foundation year [source: Student Loans Company].

Whilst we appreciate the challenges which the WG faces in making such decisions, ATL Cymru believe that FEIs should be enabled to offer the best possible option to young people close to home.

WGFY030

Name – Beth Button

Organisation – NUS Wales

Question 1: We have outlined a series of concerns regarding foundation year provision principally that it represents poor value for money and does not obviously provide any benefit to the student when compared to the available alternative routes to higher education. Do you agree with this analysis?

3.1. NUS Wales does not agree with this analysis. We have addressed a number of our concerns with our introductory comments, and will elaborate further here

3.2. **Poor value for money.** Our initial concern with this claim is the assertion in the consultation that “the number of students on courses with a foundation year is not insignificant”. The comparison of 1,788 is then given to 55,715 full-time Welsh-domiciled students enrolled in HEIs. However, a more pertinent figure would be the number of students of Welsh-domiciled students as a whole. In 2013/14, this figure was over 100,000. In Wales alone, the Welsh Government supports 1,284 full-time foundation year students out of the total 130,000 students in Wales.

3.3. As we have already suggested, the majority of these students are likely to come from widening access backgrounds and are studying STEM subjects. 1,000 students out of 130,000 (well below 1%) is actually an insignificant number in the grand funding scheme.

3.4. **Provide benefit to students.** Our opposition to tuition fee and maintenance debt is well known. We do not believe that students should be forced into poverty for the sake of an education, particularly in a knowledge-based economy that has forced young people into often needing a degree before beginning their career. However, we also recognise that a four year degree (the first year being the foundation year) is sometimes needed to ensure that students who have otherwise missed out on key skills for the course are up-to-speed. Without that, there is the possibility of falling out of university. However, far more work needs to be done to determine whether the existing foundation years’ framework is indeed providing benefit to students. The consultation document makes much of anecdotal evidence, and no hard statistics to suggest that the courses provide no benefit.

3.5. Again, we do not believe that students should be put into debt for the sake of studying. But this consultation needs to do far more work into how students themselves, and institutions, feel about how beneficial the course has been to them. If the limited number of students supported by them (and this consultation does not consider English-domiciled students who will be supported on these courses in Welsh HEIs) are able to stay in university for the remainder of their course, value the first year of the course, and come from widening participation backgrounds than it does provide value for money beyond the student.

3.6. Other routes into Higher Education. HE provision in Further Education has been briefly touched upon in this consultation. We would be interested to learn the Welsh Government's proposals for the implementation of the Hazlekorn Review, and how inter-related Higher Education and Further Education will become. It is indeed true that FE colleges (where applicable) will have prepared students for the HE course they move on to undertake. However, will removing support for a foundation year achieve that aim? Far more detail is needed.

Question 2: Which of the four proposals do you think should be implemented? Why?

4.1. NUS Wales is of the view that Option A (the status quo) is the best way forward, dependent upon the recommendations of the Diamond Review. We are unconvinced that the consultation has researched the way in which foundation years are delivered across universities across the UK. If a full review suggests that it is indeed not of benefit to students, and that course provision can be adjusted sufficiently to support students, then we would perhaps be satisfied but there does not yet appear to be evidence to suggest removing provision.

4.2. Options B and C are unacceptable. While recognising that maintenance support will be unlikely to change, it is still suggested as an Option for B. Again, students on these courses are often from widening participation backgrounds. Removing or limiting support will lead to phenomenal debt levels after just the first year. At this point, retention rates are likely to plummet. Option C, to provide support for particular subjects, is also not a position that NUS Wales can support.

4.3. Option D would be a devastating policy approach, in removing support for the foundation year. Presumably students from outside of Wales would still be able to come to Welsh HEIs, and this would create a significant competitive disadvantage for Welsh students who are forced to come in on the first year of a degree while feeling they lack the requisite skill set. This presumably also means that a student who feels they lack the skill set would be forced to take a full loan out themselves, as well as find their own maintenance support, which would have an extremely pejorative impact on widening access students; they would be unlikely to actually apply for university.

Question 3: Do you think our definition of foundation years at paragraph 30 will capture the type of provision that we have discussed?

5.1. Perhaps, but it appears largely unlikely because the paragraph itself does not provide even a draft definition. "The attainment of the student" must be compared to a starting level skill set and the requisite skill set for the commencement of the course.

Question 4: What do you think the impact on widening access will be if the Welsh Ministers were to cease support for these courses? Do you think that any particular groups would be disadvantaged by this policy? What are the characteristics of the people taking these courses?

6.1. We believe that this is likely to have a particularly negative impact upon widening access and participation. These reasons have been explained in detail above. Again, we do not believe with saddling students with debt but students must have some means of getting their skills up to the required standard for a course where they have no other opportunity to do so.

6.2. As we have reiterated throughout, a great deal more work needs to be done by the Government to have an evidence base from which to consider this argument.

Question 5 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

NUS Wales does not support a system which unnecessarily forces extra debt onto students studying in Wales. The consultation suggests that the current system does precisely that; creates four years' worth of high debt levels when a three year degree would be able to address skills shortage in the first year.

That being said, the foundation of this consultation appears to be based on anecdotal evidence. Our understanding of this issue is that the majority of students on foundation year courses are doing so in STEM areas, to raise their skill set to such that can prepare them for the first year of the course. This ties in very well to the last Welsh Government's priorities for widening access, as this would be of particular use to mature students.

There is also the strong likelihood that, in removing foundation years, retention rates would significantly drop. Students who, for whatever reason, do not have the requisite skills for the first year of a course may very well stop their university career if they feel significantly out of their depth. Foundation years go some way to change that, and again are of particular use for widening participation students.

The Welsh Government may indeed be correct when it says that, in some cases, foundation years' skills and first year skills are identical. However, there is a striking lack of evidence referenced in the consultation document. We would urge the new Welsh Government to fully examine provision and skills sets before making a decision, if this is not included as part of the Diamond Review.

As a final note, the four options presented are very much “all-or-nothing”. Option 1 and Option 4, to either keep the status quo or remove foundation years as a whole, are the only real options presented. The other options, focusing on withdrawing support to students on a foundation year, would be an extremely retrograde move. A number of students who feel ill-prepared for university, perhaps because they have been out of the system for so long or come from a widening participation background, may be put off of university entirely if they do not have a safe way of developing their skills.

We would urge the Welsh Government to fully consider and evidence each option.

WGFY031

Name – Anonymous

Organisation – Anonymous

General comments

Wishes for response to be kept anonymous.