

## Student number controls HEFCE consultation on arrangements for 2014-15 onwards

### About million+

million+ is a university think-tank which provides evidence and analysis on policy and funding regimes that impact on universities, students and the services that universities and other higher education institutions provide for business, the NHS, education and the not-for-profit sectors.

### Consultation response

The consultation sought views regarding the operation of student number control flexibility from 2014-15 onwards, the entry of publicly funded providers of higher education not currently in a relationship with HEFCE into the student number control system, and changes to the high-grades policy to exempt a limited number of combinations of qualification types from the student number control.

#### **Question 1: Do you agree with our proposed approach to offering ongoing flexibility and some increase to the student number control allocation for those institutions demonstrating strong demand?**

##### *Neither Agree / Disagree*

million+ accepts that the approach proposed will provide some flexibility and the ability to increase numbers within the SNC - assuming that students are released from institutions where recruitment falls outside of the lower end of the flexibility range and are reallocated to those where recruitment is higher than the SNC.

However, the system will be complex and to some extent unpredictable and is likely to create additional administrative and financial challenges.

The effect of recruiting within the flexibility range up to SNC level is not clear and further clarification is required as to whether the SNC for such institutions will be maintained.

#### **Question 2: For institutions whose SNC allocation has been reduced, should we offer a) only a degree of flexibility equivalent to that provided to those that have not had their allocations reduced, or b) as we have proposed, the potential of further flexibility for one year that provides a greater opportunity to recover?**

##### *Option b*

Given that there is likely to be continued uncertainty about student and institutional behaviour, million+ believes that flexibility in the first year of under-recruitment should be extended to ensure that institutions have the opportunity to recover at, or too, its previous years SNC level. This could be achieved by setting the upper flexibility point to the previous year's SNC or above.

#### **Question 3: Do you agree that the proposed characteristics of an approach to flexibility will meet the needs of those institutions that wish to grow, while appropriately protecting others from volatile changes in student number control allocations?**

##### *Neither agree / disagree*

The approach will provide an opportunity for some institutions to expand. However, bearing in mind that the pool of available students is fixed, taken to its extreme the model could create institutional instability and the Funding Council should consider how any checks and balances might be used to avoid unnecessary sector-wide institutional and reputational risk.

**Question 4: Will the proposed approach offer students more choice while also protecting the student support budget?**

*No*

million+ does not consider that the system will offer students more choice per se. In fact one consequence might be to reduce choice including for those whose preference is to study within a particular locality or region, as a result of numbers being switched to institutions which exceed their SNC within the flexibility range.

**Question 5: Can you envisage any unintended or undesirable consequences of the proposed approach?**

It is likely that many institutions will seek to recruit to the top of their flexibility margin in 2013. This may limit the number of students released into the clearing process and restrict the numbers available to institutions which manage their admissions in order to enable them to release places in August to achieve their SNC. The approach favours institutions with few SNC numbers who wish to grow their allocation. Institutional behaviours and outcomes in respect of confirmation and clearing in 2013 should therefore be taken into account.

**Question 6: Do you have any comments on the proposed methods for publicly funded institutions who wish to enter into a relationship with HEFCE so that their students are able to receive student support from 2015-16 and beyond?**

The proposal for publically funded institutions that currently have students claiming support which are not allocated numbers as part of this process should be included within the SNC allocation on condition that no adjustment is applied to institutions which are already within the system to accommodate these numbers.

million+ considers that it would be appropriate to create a fixed pool of new numbers for allocation to alternative publically funded providers for which these providers should be invited to bid. This would allow current institutions to manage their recruitment processes within a predictable SNC allocation. In terms of allocation option a) should be considered. There would be merit in colleges being required to bid for numbers with a cap on the maximum allocation in order to ensure that movement of numbers across the sector was such as to avoid unnecessary instability. These numbers should be taken from the flexible pool created by under-recruitment and prior to their redistribution to institutions recruiting above their SNC.

**Question 7a: Do you agree that the key requirements we have set out are reasonable? Are there other key requirements that you think we should take into consideration?**

*Agree*

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

*No*

**Question 8: In Table 1 we have set out a number of options for exempting combinations of qualifications from the student number control which we do not believe are viable. Do you agree that we should discount these options? Do you think there are other options that we should consider?**

*Agree*

Agree that the listed qualifications should be discounted. However, the continual changing of the equivalency list is confusing and potentially detrimental to both applicants and institutions. There would be merit in achieving some stability hereafter of what is an inherently complex system.

**Question 9: We have set out proposed criteria in this section for exempting a limited number of the most common combinations of qualification types from student number controls. Do you have any comments on the proposed criteria? Do you have any comments on the approach in general?**

million+ agrees with the exemptions proposed but considers that a full list of equivalent qualifications should be published no later than September 2013 to enable institutions to incorporate them into the standard admissions process.

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

*No*

**Question 11: Do you have any comments on our proposed approach for implementing a change to the exemptions list? Are there other aspects which we should consider?**

Early publication of the complete list will be required but it should be recognised that an extremely complex system has been created for applications and institutions with potential for confusion (and some game playing) in respect of school and college IAG.

**Question 12: Do you consider that there are any equality considerations we have not taken into account? Does the proposed approach require an institution either to disadvantage a particular group of students, or prevent steps being taken to assist a particular group? If so, which group(s), and how may the approach be modified to reduce these effects?**

This question could be better addressed when data / outcomes of 2013 recruitment are known but there are potentially access and equality issues in terms of course and institutional choice for mature and some women and BME students (who may for a variety of reasons prefer to study in their locality and region) if student numbers are reallocated. Many of these students may also have characteristics associated with widening participation. A wider view and perspective needs to be taken of the extent to which a policy based on deregulation of numbers of 'high-grade' students has the potential to favour some institutions with more inclusive student profiles and trigger unintended consequences for some students.

The stated aims of deregulation of SNCs were to incentivise the market but also to improve student choice and the quality of teaching. It remains unclear how, in overall terms, the system that HEFCE has been asked to manage will deliver these latter objectives.

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