

This response was submitted to the Children, Young People and Education Committee consultation on Sixth Senedd Priorities

CYPE SP 99

Ymateb gan: Richard Duffy, Swyddog Materion Cyhoeddus, Prifysgol Caerdydd

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Theme 1: School-age education

We would recommend that the committee give further consideration to, and scrutiny of, how the Welsh Government plans to change the qualification system after the impact of COVID-19. The shift to alternative assessment methods across the UK and the consequent inflation of top grades has had consequences for higher education (HE).¹

At Cardiff University, the 2021 grade inflation has had a significant impact.² Over-recruitment has been felt in subjects that were on a rising trend of demand or experienced a sudden surge in 2021, as well as those with places set by the Welsh Government. Such subjects include law, criminology, biosciences, medicine, dentistry, pharmacy, psychology, architecture, engineering and computer science.

The number of above-target undergraduate students exceeds 500 and could reach c. 1,000. It has necessitated the rapid appointment of c. 100 new staff members, repurposing of space for teaching, additional IT equipment and infrastructure, and extra investment in student support services (e.g., mental health, study skills, wellbeing, disability, advice and money).

Theme 2: Further and higher education

We strongly recommend that the Children, Young People and Education Committee prioritise the need for Wales to respond swiftly to forthcoming reforms of HE in England. In particular, the committee should consider the major changes to student finance. As an associated matter, the committee should examine the legacies of the Diamond and Reid reviews.^{3 4} Although parts of Diamond and all of Reid examined matters covered by other committees (e.g. research and innovation), both have a key bearing on Welsh HE's financial model.

¹ Coughlan, S., Richardson, H. and Long, J. 2021. [A-level results 2021: Top grades reach record high](#). London: BBC.

² Riordan, C. 2021. [Student recruitment, new academic year, National Student Survey, international support, Graduation](#). Cardiff: Cardiff University.

³ Diamond, I. 2016. [The Review of Higher Education Funding and Student Finance Arrangement in Wales](#). Cardiff: Welsh Government.

⁴ Reid, G. 2018. [Review of Government Funded Research and Innovation in Wales](#). Cardiff: Welsh Government.



The committee should note that the University will be suggesting that the Economy, Trade and Rural Affairs Committee prioritise the funding of research and innovation in Wales, with a particular focus on the legacies of the Diamond and Reid reviews. The University will also be suggesting that the Health and Social Care Committee prioritise the expansion of medical education and training in Wales. We would be happy to provide those submissions as supplementary evidence. Cross-committee collaboration on these matters or on a wider inquiry regarding universities could be a sensible step forward.

Reforms in England

Cardiff University is concerned that potential changes to England's student funding arrangements could unbalance the UK's shared higher education ecosystem and adversely affect Welsh universities. Reports indicate the UK Government is considering a range of major reforms, with a consultation due in the autumn.^{5 6 7 8}

^{9 10} It is believed that the UK Government will pursue some or a combination of:

- Cutting fees to £7,500, compensating for universities' lost income with higher subsidies for science, technology, engineering, and mathematics (STEM) courses, but no such subsidies for arts and humanities.
- Capping fees and allowing the cost to be eroded by inflation.
- Limiting student numbers, potentially via minimum entry requirements for access to student loans.

Changes in England affect student recruitment in Wales. A significant proportion of students at Welsh universities are English domiciled (36.6% in 2019/20).¹¹ A substantially different rate of fees between England and Wales will create problems for cross-border study. It would be highly damaging if English domiciled students were no longer attracted to Wales due to a sharp divergence in fee policies.

Equally, lost income would need to be made up in full if Wales followed suit and cut fees to £7,500 or lower. For Cardiff University, reducing fees to £7,500 would cost approximately £27.3m annually. The financial hit would have a damaging effect on all aspects of our teaching and research if not compensated.

⁵ Adams, R. 2021. ['Horrible' cuts in pipeline for English universities and students](#). London: Guardian.

⁶ Forsyth, J. 2021. [Tories want to end the university boom years](#). London: Times.

⁷ Griffiths, S. 2021. [University fees to fall — but arts degrees may suffer](#). London: Times.

⁸ Hazzell, W. 2021. [Students could be prevented from taking university courses deemed 'low value' by the Government](#). London: i.

⁹ Parr, C. 2021. [Williamson confirms London weighting cut](#). London: Research Professional.

¹⁰ Weale, S. 2021. [Funding cuts to go ahead for university arts courses in England despite opposition](#). London: Guardian.

¹¹ Higher Education Statistics Agency. 2021. [Where do HE students study?](#) Cheltenham: Higher Education Statistics Agency.



If the UK Government pursues a cap on places, the issue will be a serious one for the Welsh Government. The experiences of summer 2020 and dialogue failure between the UK and Welsh governments were portentous in this regard.¹²

There are already funding challenges around HE, irrespective of any possible fee cut in the future. Inflation and rising provision costs have resulted in declining levels of resource. This is particularly the case for lab-based subjects deemed to be of strategic importance to the UK and Welsh governments.¹³

Analysis from the Russell Group shows overall funding per student will be similar in real terms to the level it was before £9,000 fees.¹⁴ Figures from England's Office for Students show that current fees do not cover subject costs, making £7,500 completely unviable without top-up funding.¹⁵

The UK Government is also considering fast-track degrees, which have been discussed previously. The University is unconvinced there is an appetite for this form of provision within Wales. Demand for these programmes is low and two-year degrees are not the most appropriate course structure at research-intensive institutions.¹⁶

Furthermore, the UK Government is introducing a lifelong learning entitlement (LLE) via its Skills and Post-16 Education Bill, for which legislative consent is currently being considered by the Senedd.^{17 18} In keeping with the Welsh Government's view, we would not welcome any legislation that creates additional burdens, duties and financial implications for Welsh universities as a result of a policy for England.

The University is calling for the Welsh Government to convene an urgent task and finish group to consider how Wales should react to fee cuts, students caps and other reforms in England. The committee should also consider this work as a matter of urgency.

¹² Adams, R. 2020. [Plan to cap numbers at UK universities to go ahead](#). London: Guardian.

¹³ Hazell, W. 2020. [Universities losing thousands of pounds on STEM courses as funding eroded by cuts and inflation](#). London: i.

¹⁴ Russell Group. 2020. [Sustainable funding for higher education](#). London: Russell Group.

¹⁵ Office for Students. 2020. [Development of the OfS's approach to funding](#). London: Office for Students.

¹⁶ Russell Group. 2017. [Russell Group response to accelerated degrees consultation](#). London: Russell Group.

¹⁷ Department for Education. 2021. [Skills and Post-16 Education Bill: Policy Summary Notes](#). London: UK Government.

¹⁸ Miles, J. 2021. [Legislative Consent Memorandum: Skills and Post-16 Education Bill](#). Cardiff: Senedd Cymru.



The committee should also note that recommendations of the Diamond and Reid reviews remain unfulfilled, despite having been accepted by the Welsh Government. Failure to implement continues to hinder Welsh HE.

Draft Tertiary Education and Research (Wales) Bill

Finally, the committee will no doubt be tasked with scrutinising the Draft Tertiary Education and Research (Wales) Bill. The University's key views on the Bill follow:

Commission's independence: The bill needs redrafting to make clear the new Commission for Tertiary Education and Research's operation as an arms-length body. As drafted, the bill would give ministers powers over a swathe of issues which ought to lie within the purview of the commission. These include a power to modify the commission's strategy without the commission's consent or any input from the further and higher education sectors, which we would suggest is unacceptable.

Final bill's details: The draft as a whole leaves far too many powers within as-yet-undefined regulations. This legislation represents a major change to the education sector and future changes to it should come before the Senedd rather than being decided by ministerial fiat.

Universities' governance: Whilst the new commission will replace HEFCW as the regulator of Welsh HE, we would strongly recommend that the positive relationship which has been built between universities and HEFCW is maintained. In general, the Welsh sector has a more collegiate relationship with its regulator than is the case between English universities and the Office for Students (OfS). It is surprising, therefore, that many powers of the new commission more closely resemble the OfS in England rather than mirror the existing situation in Wales.

Like the OfS, the proposed new commission will:

- Maintain a register of providers, with conditions of registration.
- Require the production of access and opportunity plans, as a condition of a higher fee limit.
- Make arrangements for quality assurance provided by a designated body.
- Enjoy a power of entry and inspection.

It will also be expected to respond to ministerial priorities, with ministerial power of approval over the commission's strategic plan. We would prefer to see a system which gives greater autonomy to the new commission and a commission that, in turn, gives greater autonomy to institutions.

Research: Questions around the new commission's research and innovation agenda are much more fundamental than simply whether the agenda should be



delivered by a wider range of providers. As such, we strongly recommend that all of the recommendations of the 2018 Reid review are implemented in full prior to the establishment of any new commission. Doing so will give the university and research sector confidence that the new commission will be overseeing a sustainable and resilient research ecosystem.

We also share the concerns raised by Universities Wales about the Welsh Government seeking to specify areas of research when setting the terms and conditions of funding for the commission.¹⁹ This is a clear erosion of the protections of academic autonomy for institutions and has the potential to undermine the strategic role and authority of the commission.

Civic mission: Any definition of ‘civic mission’ in the bill should be a non-binding umbrella definition that allows universities to make their own decisions about what their own civic mission might be. This is important if universities are to retain the autonomy to deliver a civic mission that works for them and their community. From a governance perspective, it also ensures that universities are not bound by anything that might conflict with or undermine their charitable objectives.

Secondly, if the commission is to have a specific duty in terms of ensuring universities carry out a civic mission, there must be new, discrete funding to do this rather than having to come at the expense of funds earmarked for students or research.

Access and opportunity plans: As noted by Universities Wales, the proposed access & opportunity plans could end up replicating the administratively burdensome elements of existing fee & access plans — something which universities have been clear is a problem that needs addressing.²⁰ We do however welcome the movement in the bill towards access & opportunity plans covering a longer period of time, and recognise that this element does represent an improvement to the existing situation.

Freedom of speech on campus: The UK Government is pursuing its Higher Education (Freedom of Speech) Bill. We would urge the Welsh Government to rule out this being part of the new commission’s remit, on the basis that so-called ‘campus culture wars’ are an artificial construct for political purposes and addressing them is not a priority for students.

Social mobility and skills: To complement the work of the new commission, we suggest the establishment of a Social Mobility & Skills Commission to work with all educational partners and Regional Skills Partnerships to further clarify the skills needs and social mobility targets for Wales. This commission should specify the

¹⁹ Universities Wales. 2020. [Draft TER\(W\) Bill consultation response](#). Cardiff: Universities Wales.

²⁰ Ibid.



appropriate contribution of different parts of the educational system and set targets for skills development and social mobility.

Theme 3: Health and well-being, including social care (as they relate to children and young people)

Theme 4: Children and young people

