

Consultation question 1: Following the changes to funding for higher education agreed by the Government, we need to phase out the mainstream teaching funding relating to old-regime students. Do you have any comments on our proposed approach? You may wish to suggest alternatives, with reference to the principles in paragraph 34.

We feel that the question is outside our competence so have not responded.

Consultation question 2: Given the reductions to HEFCE's teaching grant from 2012-13, do you have any comments on our proposal that certain non-mainstream allocations should be phased out, and others continued as an interim measure in 2012-13, as described in paragraphs 62 to 92?

SIVS protection is needed even more than before. There are very real risks as discussed in our letter to Sir Alan Langlands and below.

Consultation question 3: Following government changes to funding for higher education, we need to change the way HEFCE provides teaching grant for new-regime students. Do you have any comments on our proposed approach for 2012-13, as outlined in paragraphs 31 to 108?

We feel that the question is outside our competence so have not responded.

Consultation question 4: We have been asked by the Government to remove students achieving **AAB+** equivalent from the student number controls. Do you have any comments on our proposed method of implementing this, as outlined in paragraphs 116 to 128? Please identify any possible negative or positive impacts from this proposal.

First question, in calculating the 4000 figure (para. 117), have you accounted for the potential student number decrease (likely to be significant because of the rush to get in before the new fees regime) between 2011 and 2012?

The AAB+ proposal may have some unintended consequences. There is substantive evidence (available via the IoP and Royal Society) that Maths and Physics are 'grades harder' than other 'A' levels. With the AAB+ proposal, institutions, particularly those who do not fill every place with AAB+ students at the moment but have a significant percentage, may slant their provision to subjects which they perceive it to be easier to recruit AAB+ students in. Subjects such as Engineering and the Physical Sciences, despite being SIVS, may then be discriminated against (i.e. provision will be threatened). A substantial part of Engineering provision is in institutions with a proportion of students with AAB+ but not 100%.

In addition, the AAB+ proposal discriminates against students with high potential but who may have achieved more modest grades because they have attended a disadvantaged school.

A number of institutions operate a pre-undergraduate 'Foundation Year' course for engineering and the physical sciences. These courses enable students, particularly those from disadvantaged school backgrounds, to have 'another run at' Maths and Physics. A number of such students then excel within the different context of the foundation year, and go on to 'fly' on undergraduate courses in engineering, a significant proportion then emerging with upper second and first class MEng degrees. Why not include a distinction at this level (equivalent say of a mark of 70%) as a potential qualifier for the AAB+ criterion. This would act as a powerful driver to keep these courses running and hence to continue to provide this strong widening participation route.

Consultation question 5: The Government has asked us to consult on a **core/margin approach** to re-allocating places towards lower fee provision in order to increase choice, competition and fee diversity. Do you have any comments on our proposed method of implementation, as outlined in paragraphs 129 to 139? Please indicate any impacts you can identify, whether positive or negative.

Applying the core/margin principle based on institutions' average fees discriminates against STEM subjects, because institutions with a strong base in these are much less likely to be able to achieve low average fees. Separate thresholds should be used for STEM subjects and other SIVS, as opposed to non-SIVS.

There is also a danger that the effect of the 8% reduction in the student control number for institutions with Access Agreements will be a disproportionate reduction in the number of places available in STEM subjects across the sector as these are likely to have higher marginal costs and therefore be more vulnerable to being cut in individual institutions.

Consultation question 6: Do you have any comments on the impact(s), positive or negative, that the proposals in this consultation will have on **equality and diversity**?

Please see our comments above about the widening participation agenda.

funding for high-cost subjects from 2013-14 – not in main consultation questions, but there may be somewhere for general comments on HEFCE's on-line form

Para 147 assumes that institutions charging lower fees nonetheless have the same costs (or provide the same quality) as those charging higher fees. There is no justification for this assumption. HEFCE should fund quality provision in preference to "lowest common denominator" provision.

In general, we are particularly concerned about four year courses such as the MEng and the potential risks to Postgraduate Taught provision as students are deterred from taking on the extra years of debt. We have commented on this in more detail in our letter to Sir Alan Langlands about the risks to engineering with the new fees regime.