



House of Commons  
Innovation, Universities,  
Science and Skills Committee

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# Withdrawal of funding for equivalent or lower level qualifications (ELQs)

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**Third Report of Session 2007–08**

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*Report, together with formal minutes*

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## The Innovation, Universities, Science & Skills Committee

The Innovation, Universities, Science & Skills Committee is appointed by the House of Commons to examine the expenditure, administration and policy of the Department for Innovation, Universities and Skills.

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# Contents

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<b>Report</b>	<i>Page</i>
<b>Summary</b>	<b>3</b>
<b>1 Introduction</b>	<b>5</b>
Equivalent or lower qualifications	5
Withdrawal of support for ELQ students	5
Effect of the withdrawal of funding on fees	6
Our inquiry	6
<b>2 Policy on public funding for ELQs</b>	<b>8</b>
Policy on funding ELQ students	8
Justification for the policy	8
The Leitch Review	9
20,000 first-time students	11
“Perpetual students”	13
Timing of the change	14
Consultation on policy	15
<b>3 Impact of the policy change</b>	<b>17</b>
Part-time students	17
Co-funding with employers	19
Disproportionate effects	20
Impact assessment	22
Data used by HEFCE for modelling	23
<b>4 Implementation</b>	<b>25</b>
Transitional arrangements	25
Exemptions proposed by HEFCE	26
Reviews of exemptions	29
Policing the arrangements	30
<b>5 Conclusions</b>	<b>32</b>
<b>Conclusions and recommendations</b>	<b>33</b>
<b>Formal Minutes</b>	<b>38</b>
<b>Witnesses</b>	<b>41</b>
<b>List of written evidence</b>	<b>42</b>
<b>List of unprinted evidence</b>	<b>45</b>
<b>List of Reports from the Committee during the current Parliament</b>	<b>50</b>



## Summary

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In September 2007 the Government announced that it was withdrawing state funding paid to higher education institutions to subsidise the fees of ELQ students, that is those studying for a qualification at the same or lower level to one they already hold. The result is that from 2008–09 students starting a second degree could see their tuition fees increase by 200%.

The Government argued that its policy was in line with the recommendations of the Leitch Review of Skills to concentrate the extra resources that it is putting in to higher education on first-time students and expecting employers to shoulder more of the burden for re-training via second degrees.

We found that consultation on the withdrawal of the funding was restricted to the implementation arrangements with the full effects of the changes and consequences for other policies such as the need for re-skilling inadequately examined. We conclude that the decision to cut funding to ELQ students was insufficiently justified either by persuasive analysis of its likely effectiveness in achieving the desired goals or evidence of the likely wider impact of the policy.

Nearly all the submissions we received were hostile to the changes.

We conclude that the transitional arrangements and exemptions are inadequate—for example, the change will affect some groups of students and some institutions more than others—and inconsistent—for example, those pursuing Turkish studies are exempt but not pharmacists. We believe that the change would have been better left until the independent review of variable fees due in 2009, which would have been able to weigh funding of ELQs against other priorities.



# 1 Introduction

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## Equivalent or lower qualifications

1. Most students in higher education are studying for their first degree. There are, however, also those who are studying for a course that leads to a qualification which is at an equivalent or lower level to a qualification that a student has already obtained.<sup>1</sup> Examples of such students—colloquially known as ELQ students—would be a person with a BA studying for a BSc or a person with a PhD studying for an MBA.

### *Withdrawal of support for ELQ students*

2. ELQ and non-ELQ students currently attract the same tuition fees. This is generally true whether they are full-time students, or are charged on a different basis as part-timers. Their fees are supplemented by the taxpayer, in England, through direct payments through the Higher Education Funding Council for England (HEFCE) channelled to the institutions where they are enrolled. On 7 September 2007 the Secretary of State for Innovation, Universities and Skills instructed HEFCE to withdraw funding from institutions for ELQ students. In future years higher education institutions admitting ELQ students—other than those for whom exemptions apply—will have to decide whether to subsidise the cost of these courses themselves or recover the costs from students by charging them higher fees.

3. In his letter of 7 September, the Secretary of State explained that the “Government has taken this decision because it believes that teaching such students is not [...] usually as high a priority for public funding as support for students who are either entering higher education for the first-time, or progressing to higher qualifications”.<sup>2</sup> The Secretary of State’s objective was to reduce support by around £100 million a year by 2010/11. He asked HEFCE in his letter to phase out the support from the academic year 2008–09 and instructed it:

to consider the details of this in consultation with the sector and it is because I know that time is short for managing this smoothly that I am writing to you now. We would not want support for any existing ELQ students already pursuing their studies to be affected and would still want the Council to give support to institutions for students who are acquiring higher qualifications from ones which they already hold.<sup>3</sup>

4. Following the Secretary of State’s letter, HEFCE consulted on the implementation of the change. The consultation period ended on 7 December 2007 and HEFCE finalised the implementation arrangements at its board meeting on 24 January 2008, based on the outcome of the consultation. Following the meeting, HEFCE sent an “admin message” to institutions, informing them of the main decisions on funding for 2008–09, including the

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1 According to HEFCE’s modelling, in 2005–06, approximately 8% of HEFCE-funded full-time equivalent student numbers were aiming for an ELQ. HEFCE, *Withdrawal of funding for equivalent or lower qualifications (ELQs) Frequently asked questions*, Question 4, <http://www.hefce.ac.uk/faq/elq.htm#q4>

2 A copy of the letter is at [http://www.hefce.ac.uk/news/hefce/2007/HEFCE\\_letterELQ.pdf](http://www.hefce.ac.uk/news/hefce/2007/HEFCE_letterELQ.pdf)

3 Secretary of State’s letter of 7 September 2007, [http://www.hefce.ac.uk/news/hefce/2007/HEFCE\\_letterELQ.pdf](http://www.hefce.ac.uk/news/hefce/2007/HEFCE_letterELQ.pdf)

withdrawal of funding for ELQ students and exemptions.<sup>4</sup> The detailed plans for implementation were published in March 2008.<sup>5</sup>

### **Effect of the withdrawal of funding on fees**

5. The effects of the decision will be significant. For example, in 2007–08 undergraduate students at Birkbeck College, University of London, will pay fees of £1,248 per annum<sup>6</sup> and the College will receive an average of £2,853 per student through HEFCE teaching funding. If fees for ELQ students were to increase to cover the loss of this funding for ELQ students, Birkbeck calculate that they would have to rise to £4,101 per annum, increasing the cost of a four year degree from £4,992 to £16,404.<sup>7</sup> The figures produced by Birkbeck College are not a national average<sup>8</sup> but we found nothing to challenge them as indicative of the scale of the change:<sup>9</sup> an increase of more than 200%. **There can be little doubt that the withdrawal of HEFCE funding support for the tuition fees charged to ELQ students will increase substantially the fees such students will have to pay, if the full cost is passed on to them.** The almost universally hostile response from higher education institutions and students led us to decide to launch a short inquiry into the withdrawal of funding of ELQ students.

### **Our inquiry**

6. Our inquiry focused on: the arguments for and against the Government's decision to phase out support to institutions for students studying ELQs; the timing of the Government's decision and of the implementation of the change; the appropriateness of exemptions from the withdrawal of funding proposed by HEFCE; the impact upon students, including whether the change will affect some groups of students more than others; and the impact of the change upon institutions, with particular reference to the long-term implications for specialised institutions such as the Open University (OU) and Birkbeck College.<sup>10</sup>

7. Because of the timetable under which the implementation arrangements were finalised, our inquiry has been swift. We held a two-part evidence session on 17 January 2008: first with the National Union of Students (NUS), the University and College Union (UCU), the OU and Birkbeck College; and secondly with Bill Rammell MP, Minister for Lifelong Learning, Further and Higher Education at the Department for Innovation, Universities and Skills (DIUS), and Professor David Eastwood, Chief Executive of HEFCE. We received memoranda and correspondence from nearly 500 institutions, organisations and individuals (including many affected by the changes).

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4 HEFCE, *Funding for universities and colleges in 2008-09*, 25 January 2008, <http://www.jiscmail.ac.uk/cgi-bin/webadmin?A2=ind0801&L=admin-hefce&T=0&F=&S=&P=448>

5 HEFCE, *HEFCE supports higher education in England with increased funding of £7.5 billion*, 6 March 2008, <http://www.hefce.ac.uk/news/hefce/2008/grant0809/>

6 For most undergraduate courses in 2008-09, though for some such as Accounting and Management (BA) fees are £1,470 and can go as high as £1,932 for Law (LLB) (Accelerated)

7 Ev 41, para 28

8 Birkbeck College has a higher proportion of ELQ students compared to many other universities.

9 See also Ev 55 [Million+] and Ev 100 [Heads of Department of Mathematical Sciences], para 6

10 "Funding for Equivalent or Lower Qualifications (ELQs)", Innovation, Universities and Skills Committee News Release No.6 (07–08), 6 December 2007, [http://www.parliament.uk/parliamentary\\_committees/ius/ius\\_061207.cfm](http://www.parliament.uk/parliamentary_committees/ius/ius_061207.cfm)

8. Despite a request, the Government did not provide us with a written memorandum on the withdrawal of support for ELQ students. The Minister sought to argue that it was sufficient for him and Professor Eastwood to appear before the committee “to discuss [the proposals] in detail” without a written memorandum.<sup>11</sup> Without the detail in a memorandum, however, we are hindered in our ability, as the Minister himself put it, “to question us, to challenge us, to scrutinise us, on the proposals that were being put forward”.<sup>12</sup> **We consider it unacceptable for there to be no memorandum provided from the Government. We expect government departments fully to comply with all reasonable requests for written submissions before they appear before us in future.**

9. Our report examines:

- a) the policy on public funding for ELQ students;
- b) the timetable for, and consultation on, the changes announced in September 2007;
- c) the effectiveness of the policy;
- d) the impact on certain institutions and groups; and
- e) the transitional arrangements and exemptions.

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11 Q 64

12 *Ibid.*

## 2 Policy on public funding for ELQs

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### Policy on funding ELQ students

10. Support from public funds for ELQ students has been circumscribed for some time and has become increasingly restricted, with students who have previously received assistance from public funds subject to regulations to decide whether they were eligible for further assistance. Currently students who already have a degree from a UK institution are not eligible for support—such as access to student loans—to meet the tuition fees charged by institutions, unless they are studying for a postgraduate course in teacher training or taking certain two year courses such as foundation degrees. Loans to assist with living costs are only available for ELQ students studying designated courses such as social work, initial teacher training or medicine.<sup>13</sup> The rationale behind these rules—as the Secretary of State’s letter of 7 September makes clear—is that the priority of the Government is to give all students the chance to do a first degree and that funding is therefore limited for students doing second degrees. The arrangements in place, before the changes announced in September 2007, therefore already affect ELQ students disadvantageously as they are not able to obtain the funding that first-time students can access (although, of course, they have previously benefited from such assistance).

11. Some of those who gave oral evidence<sup>14</sup> took the view that on principle a student with a current level 4 qualification<sup>15</sup> who wished to study for another qualification should be funded on the same basis as a first-time student. Public expenditure is limited and we cannot therefore share this view. **We accept that it is for ministers to decide priorities for funding and that it could be reasonable that public policy should give priority to students who have not studied for a first degree. This does require, however, a full rationale for, and justification of, the policy, scoping of its effects and a proper examination of possible unintended consequences, such as reducing the potential of adult learners to retrain and re-skill, which Leitch and others have argued is so vital, both on economic and social grounds.**

12. **Where resources are switched in line with those priorities, it is the responsibility of ministers also to demonstrate that there is unmet demand and that the reallocation will produce outcomes in line with the Government’s policy and without unforeseen or unacceptable consequences.**

### Justification for the policy

13. We asked the Minister why the Government had decided to withdraw funding support for the fees of ELQ students. The Minister gave two reasons.

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13 Education (Student Support) Regulations 2007 (SI 2007/176) and the Student Fees (Qualifying Courses and Persons) (England) Regulations 2007 (SI 2007/778). See also below, para 64.

14 Qq 21–22

15 That is bachelor’s degree, graduate certificate and diploma.

- a) The withdrawal was in line with recommendations of the Leitch Review of Skills.<sup>16</sup>
- b) The withdrawal of funding for ELQ students would provide resources for 20,000 first-time students.<sup>17</sup>

14. He explained that it followed from the analysis in the Leitch Review of Skills that in order “to be internationally competitive, we need to move from today with 29% of adults educated to Level 4<sup>18</sup> to at least 40% by 2020”.<sup>19</sup> The Minister continued that the whole thrust of Leitch’s analysis was:

the higher you regard the qualification chain, the more you have to pursue an approach of co-financing where [...] the State makes a contribution, but the individual and the employer make a contribution. We looked at the evidence and the fact is that there are 20 million adults within the workforce who are not yet at first degree level. Six million of those actually have A Level-equivalent qualifications and yet have not gone on to degree level, so we took the view that we wanted some further levers within the system to enable, and to ensure, that universities prioritised the recruitment of those students within the workforce who are not yet at first-degree level. In addition to that, within the [Comprehensive Spending Review] process, we had set ourselves a number of objectives. We wanted to maintain the unit of resource, we wanted to maintain, and improve, the student financial support package, we wanted to increase growth in student numbers and we wanted to improve the research base further. Given that policy impetus, but alongside it, the need to maximise our opportunities for growth, we took the decision that the best way to achieve that was to redirect that £100 million [from institutional support for fees paid by ELQ students].<sup>20</sup>

### The Leitch Review

15. Those who objected to the withdrawal of funding from ELQ students argued that it contradicted the conclusions in the Leitch Review supporting skills and lifelong learning and its pronouncements about nurturing talents.<sup>21</sup> UCU argued that the Government’s

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16 HM Treasury, *Leitch Review of Skills: Prosperity for all in the global economy - world class skills*, December 2006

17 HC Deb, 10 December 2007, col 67W; Q 78

18 That is bachelor’s degree, graduate certificate and diploma.

19 Q 66

20 Q 66; see also HM Treasury, *Leitch Review of Skills: Prosperity for all in the global economy - world class skills*, December 2006: Recommendation 40—

The costs of raised ambitions must be shared between government, employers and individuals. Government investment in skills should be focused on ensuring everyone has the opportunity to build a basic platform of skills, tackling market failures and targeting help where it is needed most. There are key market failures at all skill levels, but these impact most at the bottom end. The Review recommends a much clearer financial balance of responsibility, based on clear principles of Government funding to be targeted at market failure and responsibility shared according to economic benefit. To meet additional investment this means:

- the Government should provide the bulk of funding for basic skills and the platform of skills for employability, with employers cooperating to ensure employees are able to achieve these skills;
- for higher intermediate skills (Level 3) employers and individuals should make a much higher contribution, in the order of at least 50%; and
- at Level 4 and above, individuals and employers should pay the bulk of the additional costs as they will benefit most.

21 See Ev 23, para 1(b), Ev 37–38, paras 22–27, Ev 41 [Birkbeck College], paras 10 and 18, Ev 43 [UCU], para 32.

policy on ELQs would “undermine, rather than bolster, the Leitch agenda and government objectives to raise higher level skills and widen participation”.<sup>22</sup> UCU explained:

It is difficult to reconcile the ELQ funding withdrawal with Lord Leitch’s call “to increase the higher education sector’s focus on workforce development” and to encourage [higher education institutions] “to collaborate with employers in delivering training that meet employers’ needs”. This is because many of the threatened ELQ programmes focus on national and regional priorities for retraining and up-skilling adults. Coventry University, for example, is very concerned about the “negative impact on courses in management” especially as “improved management competence” is the “top priority for the Regional Skills Partnership under the [Regional Development Agenda]”. Similarly, cultural regeneration has been vital to the revival of the North East economy and yet the ELQ cuts threaten Sunderland University’s lifelong learning programmes with more than 40 cultural partners.<sup>23</sup>

Birkbeck College said that the ELQ changes would hit part-time students especially hard and would be in contradiction of the Government’s stated policy.<sup>24</sup> Professor Latchman explained that the Secretary of State in his speech to Universities UK on 13 September 2007 had called for universities to introduce more evening courses to allow mature adults in employment to study part-time, arguing that “only in this way can the Leitch target be achieved in a situation where 70% of the 2020 workforce has already left full time education”.<sup>25</sup> He said that the ELQ proposals would significantly impact on the institutions best able to deliver government policy and discourage other institutions from enhancing their part-time provision.<sup>26</sup>

16. With both sides in the argument claiming the Leitch Review supported their case, we wrote to Lord Leitch to ask for his view on the withdrawal of funding from ELQ students. He replied:

I set out clearly in my Review's recommendations that the UK urgently needs to increase the investment and achievement in HE Skills.

Higher level skills are critical to the future of the UK economy. We need to increase the number of people gaining these skills and effectively support people to retrain and learn flexibly, including alongside work. We need to increase investment in HE across the board: from employers, individuals and the Government.

Clearly, public funds are limited and we must prioritise investment. But any changes in funding streams and mechanisms must be effectively managed so that the excellent work that institutions such as the Open University do is not undermined.

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22 Ev 43

23 Ev 43, para 32

24 Ev 40, para 18

25 *Ibid*; see also para 26, below.

26 Ev 40, para 19

I did not define any approach on ELQs as I believed that this was more of a tactical, implementation issue. [...] I recommended the creation of the Commission of Employment and Skills to oversee such issues.<sup>27</sup>

**17. In our view, there is little evidence that withdrawing state funding for students taking ELQs in itself goes either with or against the grain of the recommendation in the Leitch Review of Skills to provide professional development with up-skilling and re-skilling as priorities. Furthermore, Leitch does not impel the Government to withdraw funding for ELQs nor require it to be maintained.** Nevertheless the imposition of a blanket withdrawal of support makes no attempt to discriminate between the different reasons for which people may be seeking an additional matriculation. It is a blunt instrument which threatens the viability of certain higher education institutions. **We recommend that the Commission for Employment and Skills undertake a review of the effects of the withdrawal of institutional funding on ELQ students and the institutions which principally educate them.**

18. The representations we received about the Leitch Review saw ELQ support as integral to Leitch's objectives of encouraging lifelong learning, acquiring new skills and professional development. **We recommend that the Government make explicit its policy to assist people looking to re-skill and obtain professional or technical development and that this must be done in time to contribute to the major review of fees policy and other higher education strategies which Government intends to undertake in 2009.**

### **20,000 first-time students**

19. The Government's main justification for its policy to switch £100 million from institutional support for ELQ students was that the resources will fund 20,000 extra first-time students.<sup>28</sup> This is part of the 50,000 additional students announced in the Comprehensive Spending Review.<sup>29</sup> The Secretary of State has set as a priority increasing the number of students in higher education.<sup>30</sup> The Minister explained that the status quo would not deliver the Government's policy to expand the numbers qualified to level 4,<sup>31</sup> a policy in line with Leitch and which has broad acceptance.<sup>32</sup> The Minister argued that the provision of financial support for ELQ students excluded first-time students.<sup>33</sup>

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27 Ev 264

28 Q 78

29 "2007 Pre-Budget Report and Comprehensive Spending Review Departmental Settlements: Department for Innovation, Universities and Skills" HM Treasury press notice PN04, 9 October 2007; See also HM Treasury, *Meeting the aspirations of the British people: 2007 Pre-Budget Report and Comprehensive Spending Review*, October 2007, Cm 7227.

30 "Secretary of State sets out priorities for higher education in the year ahead" DIUS press release, 21 January 2008; the Secretary of State set out the key priorities for higher education which included:

- increasing student numbers by 60,000 for those entering higher education for the first-time (or those progressing to a higher level qualification) by 2010/11; and
- continuing to expand Foundation Degrees, with a target of 100,000 enrolments by 2010.

31 Qq 69, 97

32 Q 66; see also HC Deb, 21 February 2008, cols 869–70W.

33 Q 83

20. The Government's approach would be substantiated if demand for level 4 qualifications from potential first-time students could be demonstrated. But the higher education sector doubted that there was the potential demand. Professor Latchman from Birkbeck College considered that there "is no evidence of huge demand" for extra places from first-time students.<sup>34</sup> Ms Tumelty, National President, NUS, saw no evidence that people who did not have degrees were being pushed out by people who did or that demand was unmet.<sup>35</sup> Professor Gourley from the OU added:

The Open University does an enormous amount of marketing, [...] it has all sorts of outreach programmes to get students in, it is one of our core missions getting people into higher education that would not have seen themselves as higher education candidates. At the moment we have no unmet demand at all; we are taking all the students who apply to us.<sup>36</sup>

21. The Minister pointed to the 100,000 students who applied to universities last year and did not gain places as proof of unmet demand.<sup>37</sup> We asked him to indicate whether, and how many of, those who were suitably qualified for the courses for which they applied did not go to university.<sup>38</sup> In response, in a subsequent memorandum the Minister said:

The issue of the "missing 100,000" has been raised with Government and other stakeholders as a matter of concern by UCAS<sup>39</sup>. Their report "Missed Opportunities? Non-Placed Applicants (NPAs) in the UCAS Data" was published in December. It notes that there are a number of reasons why applicants are not accepted onto courses. We cannot quite answer the exact question you posed. However, the proportion of applicants with fewer than 80 tariff points, often seen as the minimum needed to enter HE is relatively small across all categories of Non-Placed Applicants—10% or less. But we do not have more detailed data on the levels of qualifications within this group, adjusting for subject, institution *etc.* to get below this level of analysis. We are currently considering with UCAS what further research we can do to understand the group better and building on that what we can do to decrease the propensity of applicants not to follow through.<sup>40</sup>

22. The Government's case was also that increasing supply in itself stimulated demand. The Minister pointed out that there were 300,000 more students in higher education today than ten years ago. This had been achieved in the face of criticism that the higher education system had reached its capacity and doubts about the demand for places. The Minister said that "at every stage the system, responding to the funding steers from government, has actually managed to significantly expand the higher-education system".<sup>41</sup>

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34 Q 2

35 Q 11

36 Q 32 [Professor Gourley]

37 Qq 83–88

38 Q 88

39 Universities and Colleges Admissions Service

40 Ev 265

41 Q 97

23. In our view the Government has not shown convincing evidence that the withdrawal of funding for ELQ students and the phased re-allocation of the resources will meet its policy objective to encourage more suitably qualified individuals to start higher education for the first-time. In the absence of research on, or any analysis of, the groups to whom the redirected resources are targeted, we cannot see how the Government is certain that the funds taken from ELQ fees will meet their intended purpose efficiently or effectively. While we recognise that the expansion of the higher education sector has occurred in the teeth of substantial scepticism about the demand for, and value of, extra university places, we could find no convincing evidence that ELQ students were preventing access for first-time undergraduates or that there was a significant unmet demand from first-time undergraduates, though we accept that such evidence is not easy to collate.

24. We conclude that the Government should have carried out a full analysis of unmet demand, including the annual 100,000 individuals who apply but do not enter higher education and of their reasons for not starting higher education, before it switched resources away from ELQ students.

25. On 25 January 2008, after we had taken oral evidence, HEFCE announced funding for higher education institutions in 2008–09. It noted that existing commitments for growth in student numbers in the 2008–09 academic year amounted to approximately 26,000 full-time equivalent students (FTEs).<sup>42</sup> In a supplementary memorandum Professor Latchman from Birkbeck College pointed out that HEFCE announcement showed no additional new places available for 2008–09 in the aftermath of the ELQ decision.<sup>43</sup> In addition, the ELQ places which would be lost in 2008–09 and the consequent £20 million saving in the first year of the ELQ scheme, to which the Minister referred to in his evidence,<sup>44</sup> were not being used to produce additional numbers for 2008–09. Instead, the money was being used to fulfil existing commitments or possibly to make a saving.<sup>45</sup> **In their response to this report, we ask DIUS to explain what has happened to the £20 million the Minister said would be redistributed in 2008–09. We question the Government’s case that switching funding from ELQ students would increase opportunities for first-time graduates, in the apparent absence of newly funded extra places for first-time undergraduates in the first year of the scheme. We ask the Government to explain the rationale linking funding and places.**

### **“Perpetual students”**

26. We considered whether the decision to withdraw ELQ funding should be construed as directed at students who took one course after another rather than starting employment—so-called “perpetual students”. While accepting that there might have been “perpetual students” when education was free to students and grants were widely available, the NUS pointed out that this situation has changed now that students had to pay top-up fees and

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42 HEFCE, *Funding for universities and colleges in 2008–09*, 25 January 2008, <http://www.jiscmail.ac.uk/cgi-bin/webadmin?A2=ind0801&L=admin-hefce&T=0&F=&S=&P=448>

43 Ev 266

44 Q 87

45 Ev 266

repay loans.<sup>46</sup> The OU added that, before the September 2007 announcement, ELQ students already did not get funded in the same manner as first-time students and that a survey of its ELQ students showed that 75% were studying for vocational reasons and only 8% for personal enrichment.<sup>47</sup> **We found no convincing evidence that “perpetual students” were absorbing public resources or impeding the access of other students to higher education.**

### Timing of the change

27. There are questions too over the timing of the change in policy and the speed of implementation. There will be an independent review in 2009, working with the Office for Fair Access, to report to Parliament on all aspects of the new variable fees and student funding arrangements based on the first three years operation of the policy.<sup>48</sup> The NUS and UCU argued that:

It seems [...] putting the cart before the horse to unilaterally withdraw funding from one particular group of students as we run up into that review. [...] if we are going to have this question around whether we should fund second degree or second chance learners at all, it should be deferred to the 2009 review when we can look at how the whole sector is funded, and what support we give to individual groups of students.<sup>49</sup>

28. The Minister confirmed the scope of the 2009 Commission but was concerned that it was unlikely to report until the middle or end of 2009.<sup>50</sup> He argued that, if the change were delayed until then, “that would effectively mean that we have agreed here and now that we are going to make none of these changes during the whole of this [Comprehensive Spending Review] period [ending in 2010/11]. Given the Leitch skills imperative, I believe that would be the wrong thing to do.”<sup>51</sup> We welcome the Government’s focus on the improvement of skills impelled by the Leitch Review, although, as we discuss above, the Leitch Review does not offer clear support for the Government’s policy. The Minister’s reference to the Comprehensive Spending Review may be more telling. We note that the DIUS 2007 CSR settlement provides 2.2 per cent annual average real growth in expenditure over the CSR07 period, from £18 billion in 2007–08 to £20.8 billion in 2010–11. Amongst other matters

this will ensure that [...] by 2010–11 reprioritising about £100 million a year of HE funding to increase and widen participation, by focusing public funding mainly on students participating in the system for the first time.<sup>52</sup>

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46 Q 23

47 Q 24

48 Department for Education and Skills, 2006, *The Five Year Strategy for Children and Learners: Maintaining the Excellent Progress*, chapter 8, para 67 and HM Treasury, *Leitch Review of Skills: Prosperity for all in the global economy - world class skills*, December 2006, para 67

49 Q 15 [Ms Tumelty; Ms Hunt]

50 Q 94

51 *Ibid.*

52 Cm 7227, paras D4.4–4.5

The Minister confirmed that the withdrawal of ELQ funding was the direct product of the Comprehensive Spending Review.<sup>53</sup>

29. The long-planned independent review of the operation of variable fees in 2009 will provide a suitable opportunity for a comprehensive and coherent review of all tuition fees and their impact on students and on higher education institutions. The Government's decision to start the withdrawal of funding for ELQ students' fees in 2008–09 ahead of the 2009 review can only be justified if there is a pressing reason for urgency in the matter. **We see no evidence that there is a pressing reason to make the changes to ELQ funding in 2008–09 and believe that the Government should have waited for the 2009 review of fees, which would have been able to weigh funding of ELQs against other priorities.**

### Consultation on policy

30. Our final concern on the decision process is over consultation. We note that following the Secretary of State's letter of 7 September 2007, HEFCE published a consultation document, *Withdrawal of funding for equivalent or lower qualifications (ELQs)*,<sup>54</sup> which included details of exemptions and transitional arrangements. In November, HEFCE held consultation events in Manchester, Birmingham and London to discuss the proposals. In the "admin message" issued in January 2008 following the consultation, the Board of HEFCE noted that, while significant concern had been raised about the ELQ policy, the majority of respondents to the consultation agreed with HEFCE's proposals for implementation. It therefore endorsed the proposals for implementing the ELQ policy as described in the consultation document, subject to some changes to the exemptions and transitional arrangements.<sup>55</sup>

31. In contrast, there has been no consultation at all on the policy decision itself. Prior to its instruction to HEFCE, the Government carried out no public consultation with higher education institutions or with representatives of students, employers or professional bodies. We asked the Minister why he did not consult on the principles before embarking on the ELQ changes. He replied:

Let me turn that round. Where was the consultation that the interests of eight million graduates should be put ahead of the 20 million people in the workforce who do not have degree-level qualifications? In terms of the priorities that we set out within the HEFCE grant letter, that has always been a matter for the Government and ministers to give those steers. What we have done, however, additionally to that is, rightly, consulted on the detailed implementation.<sup>56</sup>

32. Commenting on the consultation, Professor Latchman from Birkbeck College said:

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53 Q 66

54 HEFCE, *Withdrawal of funding for equivalent or lower qualifications (ELQs) Consultation on implementation*, HEFCE Reference 2007/27, September 2007, [http://www.hefce.ac.uk/pubs/hefce/2007/07\\_27/](http://www.hefce.ac.uk/pubs/hefce/2007/07_27/)

55 HEFCE, *Funding for universities and colleges in 2008–09*, 25 January 2008, <http://www.jiscmail.ac.uk/cgi-bin/webadmin?A2=ind0801&L=admin-hefce&T=0&F=&S=&P=448>

56 Q 101

We have not had consultation about what other possible sources of this hundred million pounds there are, we have not had clear evidence of student demand, and most importantly [...] we have not had proper resourcing of the part time sector and the students who want to study part time in terms of grants so that we can achieve these hard to reach students.<sup>57</sup>

Many other concerns were raised in submissions to this inquiry which went far beyond the relatively limited adjustments the Government was prepared to make to the implementation arrangements. The Government can, of course, announce its priorities for funding without consultation but, where it does, it runs the risk of failing to test its proposals with debate, of unforeseen consequences and of alienating those who have to implement its changed priorities. Consultation would have allowed the assumptions underpinning the switch of funding and the full consequences of the policy to have been examined and the adequacy of the transitional arrangements and exemptions to have been tested. **The Committee accepts that the consultation on the implementation was open and that as a result DIUS and HEFCE have made some changes to the original package. We conclude, however, that DIUS should have carried out public consultation about the principle, merits and consequences of the policy rather than exclusively on the implementation of the package.**

### 3 Impact of the policy change

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33. As the Minister implied in response to our question about the lack of consultation on the ELQ changes,<sup>58</sup> it is a dilemma of policy formulation that, when resources are switched, those suffering the loss can often immediately measure the effect and they usually have the means to express their disapproval whereas those gaining from the switch may not even be aware of the gain nor have a vehicle with which to express their views. Nevertheless, it is important that the impact of the policy change is properly understood by the Government and it is clear that this particular policy will have a significant impact on the higher education sector.

#### Part-time students

34. At the centre of the debate on the withdrawal of ELQ funding is the effect that the changes will have on part-time students. In the consultation document on the ELQ proposals issued in September 2007, HEFCE said “we are aware of the potential impact of the withdrawal of funding for ELQs on part-time provision. Our modelling shows that part-time students are disproportionately affected by this change in policy. We are concerned that this may threaten the short-term viability of some part-time provision”. In order “to ensure that new [...] entrants do not find their opportunities for part-time study suddenly reduced”, HEFCE proposed:

to introduce a £20 million supplement to the part-time targeted allocation. This funding will be introduced in 2009–10, which is the first year in which the ELQ policy will have a significant sector-wide impact. Institutions will be able to use this money to support courses that are particularly affected by the withdrawal of funding for ELQs. In the longer term, institutions may wish to ensure the sustainability of their part-time courses by applying for non-ELQ additional student numbers, securing other sources of income (including fees), or through a process of rationalisation. This supplement will be subject to review in 2011–12.<sup>59</sup>

35. The Government has an improving record on part-time students. The Minister reminded us that this was “the first government ever to bring in a part-time student grant” and that “two years ago we increased the value of that by 27%”.<sup>60</sup> He considered that “part-timers and more mature students are likely to be significant gainers through that process [of re-directing £100 million from ELQ students], but it is also the fact that we are increasing higher-education funding by 2.5% above inflation during the course of this [Comprehensive Spending Review], so there will be further opportunities to make good on the part-time front”.<sup>61</sup> He accepted, however, that the ELQ proposals had an impact on

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58 Q 101

59 HEFCE, *Withdrawal of funding for equivalent or lower qualifications (ELQs) Consultation on implementation*, HEFCE Reference 2007/27, September 2007, paras 34–35, 39

60 Q 127

61 Q 70

part-time provision and he announced during the evidence session that the £20 million supplement available through HEFCE would be increased to £30 million.<sup>62</sup>

36. The higher education sector did not share the Minister's view of the Government's generosity towards part-time education. Professor Latchman of Birkbeck College said that funding for part-time students was "inadequate". He pointed out that several years ago HEFCE had commissioned a report from JM Consulting which reported that on a full-time equivalent basis the costs of part-time students to the institution could be up to 44% more than regular students.<sup>63</sup> Professor Latchman continued:

We get a 10% premium for that under the current system and your round figure of £20 million will raise that to 13.1%, so that is 13.1% against existing extra costs of 44%, or around there depending on the level of the course, and so that is entirely inadequate. We have been arguing for better support for part time [students] for umpteen years. It is ironic that it is only coming at this moment to the background of huge damage to the part time sector.<sup>64</sup>

In a supplementary memorandum Professor Latchman pointed out that the premium had remained unchanged at 10% for at least five years and that, when a review that HEFCE had set up to examine the effect of top-up fees for full-time students on the part-time sector recommended an increase in the part-time premium in January 2005, this had been rejected by HEFCE Board.<sup>65</sup> The allocation of £30 million would increase the part-time premium to approximately 15%.<sup>66</sup> UCU was concerned about the broader impact of the withdrawal of funding on the education of part-time students. It feared "that the ELQ funding changes will result in a permanent loss of staff expertise in working with adults and part-time students at the HE level".<sup>67</sup>

**37. We saw no convincing evidence that part-time students would gain from the redistribution of funds away from ELQ students. We welcome and endorse the priority, and funding, that the Government has given to part-time students to improve their skills and we recognise that the Government has made improvements in support for part-time students. However, overall support for part-time students remains precarious and we conclude that these proposals are in danger of undermining improvements and current progress.**

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62 Q 127

63 Qq 58–59; see also "The costs of alternative modes of delivery", A study for HEFCE by JM Consulting Ltd, August 2003, [http://www.hefce.ac.uk/pubs/rdreports/2003/rd14\\_03/](http://www.hefce.ac.uk/pubs/rdreports/2003/rd14_03/). The report found (p. 12) the costs of teaching the types of part-time students it reviewed were higher than those of the equivalent proportion of full-time students due to three factors:

- administration costs are often higher for a part-time student (headcount) than they are for a full-time student;
- cohort sizes in evening and weekend study are generally smaller; and
- pastoral support can be the same for a part-time student as for a full-time student.

The report cautioned costs available for the study were not robust, but an indication of the impact of these three factors.

64 Q 59

65 Ev 266

66 *Ibid.*

67 Ev 46

### Co-funding with employers

38. While the Government acknowledged that the withdrawal of ELQ funding would affect part-time students and was prepared to make some adjustments to the package, the main plank of its policy was to look to employers to co-fund programmes.<sup>68</sup> As the Minister put it, “there needs to be a cultural change and it needs to be based on co-financing”.<sup>69</sup> He explained that the Government, with employers, needed to make changes “so that people will actually invest”.<sup>70</sup> The Minister drew attention to 15 projects that HEFCE was funding across the country on co-financing initiatives and to the funding package of “at least £100 million during the course of the next [Comprehensive Spending Review] period for co-financing initiatives with employers” that had been announced in December 2007.<sup>71</sup> In addition, he also wanted “levers within the system” to enable, and to ensure, that universities prioritised the recruitment of those students within the workforce who were not yet at first-degree level.<sup>72</sup> The implication to us was that the Minister was applying the carrot of extra funding with the stick of the withdrawal of ELQ funding to achieve the policy of greater co-funding by employers. Later in the session he acknowledged that co-funding would not provide universal funding and said that “for those people who are with an employer who will not invest in them, there are other routes to reskilling that we are protecting within this process”.<sup>73</sup> Specifically for the self-employed, he said that there would be “routes through the system to ensure that you can re-skill, for example in respect of vocational foundation degrees, which [...] should become the trademark qualification for people who are looking to change careers, and a whole series of subjects which are exempted”.<sup>74</sup>

39. The higher education sector did not share the Government’s belief in co-funding by employers. Birkbeck College said that many students “will not tell us who their employer is because they are studying to move on”<sup>75</sup> and individuals who made submission to our inquiry confirmed that they had studied, or were studying, an ELQ in order to re-train or develop their careers.<sup>76</sup> The OU said that in a survey of ELQ students, 12% received some support from their employers and 9% had full support and that this “does not change a pattern we have seen over many years”.<sup>77</sup> Professor Gourley from the OU explained that:

a lot of students are actually studying to escape present employers not necessarily stay with present employers, and we also have to accept that most people nowadays do not have one employer and one career, they have four, five, six different careers

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68 Q 79

69 Q 72

70 Q 69

71 Q 72; see also “Funding Boost for Higher Level Skills in the Workforce”, DIUS press release, 4 December 2007.

72 Q 66

73 Q 69

74 Q 126

75 Q 39 [Professor Latchman]

76 For example Ev 53; ELQ 2 [Elizabeth Brown], ELQ 7 [Stephen J Dobson], ELQ 12 [Bob Crawford], ELQ 29 [Keith Moyle], ELQ 35 [Tim Lambert], ELQ 43 [Amy Theerman], ELQ 59 [Dr David Mercer], ELQ 63 [Evan Haynes] [not printed]

77 Q 34

over a lifetime, and the economy is offering them all sorts of different kinds of careers and they have to up-skill and re-skill to take advantage of that. Employers have no particular interest in supporting that.<sup>78</sup>

40. These comments illustrate how the ELQ debate can be seen as a surrogate debate about the involvement of employers funding higher education.<sup>79</sup> It is clear, however, that, as a result of £100 million switch in resources, much of the funding given by one hand of government to assist part-time students will be taken by the other from those studying ELQs part-time. **The result of the policy may be that, with an increased reliance on co-funding, employers will have greater influence over the choice of courses part-time students take. Those who are self-employed or who work for small or medium sized businesses will have reduced opportunity of co-funding. We have therefore concerns that the withdrawal of ELQ funding will remove the flexibility in the system that allows individuals without employers' support to acquire new skills to be able to change employment and meet the needs of a changing economy.**

41. The Government is itself a major employer, particularly through the Civil Service, the National Health Service, the Armed Forces and education. Given the pressures for professional development we expect that many government employees will seek to study for qualifications which are at the same or lower level to ones that they already hold. They will become ELQ students faced with fees unsubsidised through HEFCE. **We conclude that the Government needs to publish its policy as an employer on funding its employees' fees when they become ELQ students.**

### Disproportionate effects

42. A broad range of concerns was raised with us about the effects of the withdrawal of institutional support for ELQ students, especially that the effects would not be felt evenly and that certain groups, sectors and areas of study would be penalised disproportionately. Ms Tumelty from the NUS was worried about the impact on equality, particularly on women who had career breaks and who might need to improve existing, or acquire new, skills before going back into the workplace, which, she added, “is a really important issue seeing as women students make up 62% of part time students, so they are going to be massively disproportionately affected by this decision”.<sup>80</sup> The UK Resource Centre for Women in Science, Engineering and Technology and the Women’s Budget Group shared NUS’s concern. They pointed out that the withdrawal would:

- disproportionately impact on women as part time learners, and students of ELQ degrees because women as a group earn less or have less access to financial support;
- deter people (mostly women) who have had a career break (often for caring reasons) or have followed unconventional career paths, from undertaking re-skilling;
- undermine programmes and courses specifically for returners; and

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78 Q 35

79 See also Q 36.

80 Q 12

- work against government strategy and funding to encourage women in Science, Engineering and Technology (SET) as many potential learners were currently outside the SET labour market and were often in part-time jobs that did not utilise their technical qualifications and where employer support for their re-skilling was unrealistic.<sup>81</sup>

43. Other witnesses claimed disproportionate effects of the withdrawal of the ELQ funding would be felt by disadvantaged groups, traditionally under-represented in society, and by other groups, disciplines, institutions and localities. Here are some examples.

### Groups

44. Skill: the National Bureau for Students with Disabilities was concerned about the effect the withdrawal of ELQ funding would have on disabled people who either became disabled after finishing their degree, or whose impairment or condition deteriorated to such an extent that they could no longer pursue their original career.<sup>82</sup>

45. Million+, which represents post-1992 universities, said that the London institutions in the 22 identified by HEFCE as losing the most funding as a result of the ELQ changes were some of the most successful in recruiting black and minority ethnic students.<sup>83</sup>

### Disciplines

46. The British Computer Society argued that the ELQ changes would deter graduates in other disciplines from making a switch to IT. It explained that IT was vulnerable to a change in ELQ funding because of the small numbers inside the industry with existing IT qualifications combined with high growth rates in the industry. One option currently for those who did not have a first degree in IT was to take a qualification at the same level as their existing one.<sup>84</sup>

47. The CBI considered the “most damaging consequence of these plans” would be the impact on management programmes, especially MBAs, when it was essential for firms to compete in the global economy.<sup>85</sup>

48. Oxford University explained that it worked with theological training colleges to provide advanced academic, yet practical, theological courses. The majority of students were ordinands who already held an undergraduate or postgraduate degree in another subject. The churches were unlikely to be able to meet the increase in fees, and salaries in the churches were not at a level where such students could afford full-cost fees themselves. If the ELQ policy were implemented, the university considered that it was “highly likely that these courses will close”.<sup>86</sup>

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81 Ev 115, 182

82 Ev 81

83 Ev 56, para 21

84 Ev 90, para 14

85 Ev 240, paras 8–9; see also Ev 72 and Ev 217.

86 Ev 98, para 7

### *Institutions*

49. The Institute of Education, University of London, drew attention to the effect of the withdrawal of ELQ funding faced by subject specialist institutions, especially institutions with a disciplinary focus which often served predominantly postgraduate students. It said that the nature of specialist institutions and their markets was inherently less flexible than that of multi-faculty providers.<sup>87</sup>

50. We have in this report noted in some detail the submissions of two “specialist” institutions, Birkbeck College and the OU.

### *Areas of the country*

51. The London Chamber of Commerce and Industry said that the changes would have a negative impact on London’s businesses. Reducing support for ELQs would inevitably discourage people in London, where there was a shortage of certain skills, from re-skilling or seeking additional qualifications.<sup>88</sup> LondonHigher doubted that large companies in London would invest in higher education, since the economic and cultural benefits of working in the capital meant that recruitment was often global. Hence there was little incentive for employers to upskill or retrain staff as opposed to seeking overseas candidates with appropriate higher level skills, to the detriment of London’s work force.<sup>89</sup>

### **Impact assessment**

52. In the consultation document published in September 2007, HEFCE said that it was:

concerned to ensure that our plans for implementing the ELQ policy do not impact negatively on any particular sub-set of the student population. This is particularly important given our statutory duty to have regard to eliminating unlawful discrimination and promoting equality (particularly in relation to gender, disability and race). Respondents to the consultation are invited to comment on any such unintended consequences. We will use this information to inform our assessment of the ELQ policy on the sector and, where possible, to take mitigating action.<sup>90</sup>

53. We are concerned that HEFCE was not able to carry out the assessment before embarking on the consultation exercise. We assume that it was constrained by the tight timetable set by DIUS. **We are disappointed that HEFCE appears not to have pressed the Government to allow it to carry out a full impact assessment study. We recommend that in future before embarking on major changes such as the withdrawal of ELQ funding, the Government ensure that a full sector assessment of the impact of the proposals is carried out and the results published with consultation exercises.**

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87 Ev 166-7, para 5

88 Ev 107

89 Ev 139, para 9

90 HEFCE, *Withdrawal of funding for equivalent or lower qualifications (ELQs) Consultation on implementation*, HEFCE Reference 2007/27, September 2007, para 40

54. By the time that we took oral evidence in January 2008, HEFCE had conducted a full sector impact assessment on “the whole range of equalities issues” which it intended to publish.<sup>91</sup> The Minister and HEFCE were both reassuring about the alleged disproportionate effects of the policy. For example, the Minister told us that of the 20 million adults within the workforce who were not yet at Level 4,<sup>92</sup> ten million of them were women and that two and a half million women were qualified to A-level but did not go on to degree level.<sup>93</sup> Professor Eastwood from HEFCE added that the assessment showed the impact of the withdrawal of ELQ funding was a “marginal differential” between men and women.<sup>94</sup> On students with disabilities, Professor Eastwood said that his “advice is that there are no particular issues relating to students with disabilities”<sup>95</sup> but he would keep the “matter under review”.<sup>96</sup> On the effect on post-1992 universities, Professor Eastwood said that there was a differential compared to other universities “but it is not a huge differential” and “a significant part of the redistribution of numbers will be redistribution towards widening participation”.<sup>97</sup> He added that further analysis would be done by institutions because it was institutions that determine the distribution of block grant.<sup>98</sup>

55. We are surprised that Professor Eastwood quoted from an unpublished assessment. His points conflict with many of the submissions offered to our inquiry. **We recommend that HEFCE publish the sector assessment of the impact of the policy of withdrawing funding for ELQ fees as soon as possible, in order to facilitate further analysis where necessary.**

### Data used by HEFCE for modelling

56. When it carried out the consultation exercise in September 2007, HEFCE published models of the impact of the ELQ changes on individual institutions.<sup>99</sup> The statistical projections made by HEFCE to calculate the level of grant to be withheld from higher education institutions as a result of the implementation of the ELQ policy were based on historical data. Oxford University found HEFCE’s approach “troubling”.<sup>100</sup> It pointed out that universities had collected and returned data on students and their courses in 2005–06 in good faith and according to the requirements of the Higher Education Statistics Agency (HESA) coding manual. The data had not been collected and returned with a view to underpinning the ELQ policy and was unsuitable for the purpose. Oxford considered that something in excess of £1 million was included within the calculation of teaching grant to be withheld which, in its judgement, should not be included. It explained:

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91 Qq 108 and 112

92 That is bachelor’s degree, graduate certificate or diploma.

93 Q 137

94 Q 138

95 Q 110; See also Q 113.

96 Q 113

97 Q 114

98 Q 117

99 HEFCE, *Withdrawal of funding for equivalent or lower qualifications (ELQs) Consultation on implementation*, HEFCE Reference 2007/27, September 2007; modelling at [http://www.hefce.ac.uk/pubs/hefce/2007/07\\_27/07\\_27s.xls](http://www.hefce.ac.uk/pubs/hefce/2007/07_27/07_27s.xls)

100 Ev 258

The data returned to HESA for 2005–06, while appropriate in terms of the requirements of that exercise, misrepresent the number of ELQ students in that university’s population from the perspective of the new policy. Our student record system [...] uses a number of default values in fields which, under the ELQ policy, now become highly significant. This has resulted in HEFCE inferring higher levels of non-ELQ students in our population and not picking up on SIVS<sup>101</sup> subjects within the programme.<sup>102</sup>

Oxford argued that HEFCE should not withhold grant as a consequence of a coding decision taken for reasons unrelated to the ELQ policy but should base such decisions on a count of actual ELQ students.<sup>103</sup> Oxford hoped that HEFCE would investigate carefully any appeals by universities.<sup>104</sup>

57. We have concerns that the data which HEFCE collected, before the withdrawal of funding for ELQ students was considered, may not be accurate and may result in higher education institutions losing grant to which they are entitled. **We recommend that HEFCE institute a speedy appeals system that will allow higher education institutions to challenge the data about ELQ students on which grant, including the safety net, is calculated.**

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101 Strategically Important and Vulnerable Subjects

102 Ev 259, para 2

103 Ev 258

104 Ev 259, para 4

## 4 Implementation

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### Transitional arrangements

58. The Government and HEFCE have put in place a number of transitional measures to allow institutions to adjust to the new funding arrangements for fees. Transitional protection will mean that no institution will lose money in cash terms against its 2007–08 baseline allocation over the next three years. That protection would exist even if those institutions did not successfully attract a single additional student and, as the Minister pointed out, was provided “on the back of an expansion of the higher-education budget”.<sup>105</sup> On timing, he made the point that implementation would be phased and that in 2008–09 only 0.2% of the overall higher-education budget would be affected.<sup>106</sup> Professor Eastwood from HEFCE considered that higher education institutions would have “ample opportunity to make adjustments in provision, recruitment and additional student numbers”.<sup>107</sup>

59. The higher education sector had concerns about the adequacy of the transitional arrangements. Although Professor Gourley from the OU said “we will manage the first three years with the safety netting”, she considered that the three year safety netting would still “cause damage”, particularly after the safety net was withdrawn.<sup>108</sup> She said that the problem was magnified for the OU because the ELQ changes would take 29,000 students out of the OU’s system which was a serious part of its business.<sup>109</sup> Of particular concern was what happened after the safety netting ended because the OU created courses over a longer period of time than “ordinary institutions”.<sup>110</sup> More time was therefore needed to re-design its courses to adapt to the loss of ELQ students. The NUS was concerned about the viability of courses. It pointed out that ELQ students were taught in the same lecture theatres as other groups of students, and if this funding was cut then it could damage the viability of other courses and therefore have an impact across the sector on those first-time students as well.<sup>111</sup>

60. In his evidence, Professor Latchman from Birkbeck College posed a number of questions on the transitional arrangements which he said have not been answered:

- While core grant activity will be safety netted, will the net also cover the widening participation element of grant?
- Is the capital allocation for buildings going to be maintained even though that has an element of student numbers in it?

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105 Q 68

106 Q 76

107 Q 118

108 Q 57 [Professor Gourley]

109 *Ibid.*

110 *Ibid.*

111 Q 47 [Ms Tumelty]

- Will any additional resource attracted by co-funded students reduce the safety net?<sup>112</sup>

61. The detailed operation of the safety net is not clear. **The Government needs to explain in detail how the safety net will work so that institutions can adequately plan their finances for the period of the transitional arrangements. In particular, the Government must clarify the points raised by Professor Latchman.**

62. **In our view three years is an adequate period for transitional arrangements and the higher education sector as a whole could not reasonably expect a longer period. It should give most higher education institutions enough time to make adjustments to their courses and to attract first-time students to fill gaps left by withdrawal of ELQ funding. We recommend that this be the subject of a short, sharp, interim review by HEFCE, with whatever recommendations to Government prove necessary.**

63. **We recognise that additional measures may be needed to assist those higher education institutions particularly badly hit by the withdrawal of funding for ELQ students and recommend that the Government provide for such additional measures.**

### Exemptions proposed by HEFCE

64. As part of the September 2007 consultation, HEFCE sought views on exemptions from the withdrawal of funding for ELQ students.<sup>113</sup> The list offered drew directly on earlier arrangements to restrict support to students taking second undergraduate degree courses, in particular the Education (Student Support) Regulations 2007<sup>114</sup> and the Student Fees (Qualifying Courses and Persons) (England) Regulations 2007.<sup>115</sup> In summary, these regulations provide that students who already have a degree from a UK institution are not eligible for a loan to pay their tuition fees unless they are studying for a postgraduate course in teacher training or taking certain two year courses.<sup>116</sup> Loans for living costs are only available for students studying designated courses: social work, initial teacher training, medicine, veterinary surgeon, architect, landscape architect, landscape designer, landscape manager, town planner or town and country planner.<sup>117</sup> There are also exemptions for students on courses leading to qualification to practise as a nurse, midwife, social worker or in other related healthcare.<sup>118</sup> The September 2007 package of exemptions uniquely added an exemption for Strategically Important and Vulnerable Subjects (SIVS),<sup>119</sup> subjects that have an importance either to the economy or to the welfare of society. SIVS cover:

- a) science, technology, engineering and mathematics;

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112 Q 55

113 HEFCE, *Withdrawal of funding for equivalent or lower qualifications (ELQs) Consultation on implementation*, HEFCE Reference 2007/27, September 2007, [http://www.hefce.ac.uk/pubs/hefce/2007/07\\_27/](http://www.hefce.ac.uk/pubs/hefce/2007/07_27/)

114 SI 2007/176

115 SI 2007/778

116 SI 2007/176, Regulation 18 (1)

117 SI 2007/176, Regulations 6(6), and 62

118 SI 2007/176, Regulation 5(1)

119 HEFCE, *Withdrawal of funding for equivalent or lower qualifications (ELQs) Consultation on implementation*, HEFCE Reference 2007/27, September 2007, Annex C

- b) area studies and related minority languages, including:
- Arabic and Turkish language studies and other Middle Eastern area studies, former Soviet Union Caucasus and central Asian area studies;
  - Japanese, Chinese, Mandarin and other far eastern languages and area studies;
  - courses relating to recent EU accession countries, especially those in Eastern Europe and the Baltic states.
- c) modern foreign languages;
- d) land-based studies;
- e) quantitative social science; and
- f) Islamic studies.

65. In January 2008 HEFCE Board endorsed the September 2007 package of exemptions, subject to the following changes:

- a) to review annually the levels of demand in exempt and protected subjects, and other subjects which might in future have key economic or social significance, but at this stage not to exempt additional subjects;
- b) to give further consideration to exempting students in receipt of the Disabled Students Allowance; and
- c) to exempt students studying in Northern Ireland with the OU.<sup>120</sup>

66. During our questioning of him, a further concession was made by the Minister when he informed us that he would ask HEFCE to consult with interested parties, and respond within two months, on the training of theologians and religious teachers.<sup>121</sup> **We welcome the immediate review of support for those studying theology as an ELQ and recommend that the Government exempt those studying theology as an ELQ from the withdrawal of funding.**

67. A major criticism running through the representations we received was the inconsistencies in the exemptions. For example:

- Those with responsibility for teaching pharmacy (not exempted) could see no reason why pharmacy, especially given the shortage of pharmacists, should be treated any differently to the health-related subjects that were exempt.<sup>122</sup>
- Christian theological institutions questioned why they were not exempt when Islamic Studies were.<sup>123</sup>

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120 HEFCE, *Funding for universities and colleges in 2008–09*, 25 January 2008, <http://www.jiscmail.ac.uk/cgi-bin/webadmin?A2=ind0801&L=admin-hefce&T=0&F=&S=&P=448>

121 Q 135

122 Ev 128, para 6; Ev 203; Ev 131, para 6; Ev 79, para 5

123 Ev 91, para 5; Ev 206; Ev 230, para 7

- Those with responsibilities for Computer Science, Computing and IT argued that since IT was a strategic subject and the level of provision fell short of demand from employers, it should have Strategically Important and Vulnerable status and be exempt.<sup>124</sup>
- The Council for the Mathematical Sciences was concerned that the ELQ policy would undermine the Government’s targets for increasing the number of specialist teachers in SIVS by introducing disincentives to retraining or up-skilling in these areas.<sup>125</sup>
- The Association of Business Schools argued that list of SIVS was neither meaningful nor a fair basis on which to protect ELQ funding as it conflated two very different sets of issues—national importance and market demand—and it did not include for example, management and leadership development, which the Government itself (via the Council for Excellence in Management and Leadership) had accepted as being of major strategic importance to improved productivity and international competitiveness.<sup>126</sup>
- The Tavistock and Portman NHS Foundation Trust asked why nurse-qualifying courses were exempt but continuing professional development programmes for all mental-health professionals, including post-registration nurses, were not listed as exempt.<sup>127</sup>
- Bodies representing psychiatrists and psychotherapists considered the withdrawal of ELQ funding to be in conflict with the Department of Health’s emphasis on continuing professional development and the acquisition of skills to facilitate transfer across levels in the workforce and pointed out that previous study and experience was a requirement for certain studies and that, if courses were not exempted, it would have a serious effect on higher education institutions’ ability to offer affordable courses.<sup>128</sup>
- The Royal Veterinary College considered it essential that unless the exemptions included students studying for a first registerable veterinary surgeon qualification the progress it had made to facilitate graduate entry to its professional veterinary degree would be undermined.<sup>129</sup>
- Conservatoires UK said that the training process for performers at the highest level required several years of postgraduate study, and because the professions these students entered were supported by public subsidy, co-funding from employers was unrealistic and that a consequence of the ELQ policy would be that the best

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124 Ev 144, paras 21-22; Ev 90, para 15

125 Ev 102–04; see also Ev 99–100.

126 Ev 249

127 Ev 120 [Tavistock and Portman NHS Foundation Trust], para 5.1

128 Ev 87 [Institute of Psychiatry]; Ev64 [British Association for Counselling and Psychotherapy], para 3; Ev 150–152 [The British Psychological Society]; Ev 198 [British Association of Psychotherapists]; See also Ev 78 [King’s College London], para 4 and Ev 105–107 [Relate].

129 Ev 62, paras 4-5

students would seek more affordable training outside the UK, thus undermining the reputation of UK higher education in these areas.<sup>130</sup>

- The British Association for Applied Linguistics was concerned that the ELQ proposals would impact on those wanting to change careers in response to global market developments, in particular to upgrade their qualifications in applied linguistics and related subjects.<sup>131</sup>

68. In the time made available to it by the Government, HEFCE appears to have had little choice other than to use the exemptions provided in the Student Support and Student Fees regulations with an exemption for Strategically Important and Vulnerable Subjects bolted on, both elements of which were designed for other purposes. The result is unsatisfactory. We cannot see, for example, why the Government was prepared to make a special exemption for theological students<sup>132</sup> but not others. The exemptions were also originally designed before the Leitch Review was published. **We conclude that the exemptions proposed by the Government are inconsistent and unsuitable for determining state support for the fees of ELQ students. We conclude that the Government ought to have asked HEFCE to design exemptions from the withdrawal of funding for ELQ students that aligned with the Leitch review to focus on students and courses likely to provide the greatest benefit to the economy or to meet skills shortages. Of the alternatives offered, by Birkbeck College for example, we conclude that the best case could be made for part-time students following courses that lead to re-training and hence value to the economy. Given the proposed policy of the Government, there is, however, no feasible alternative to the subject-specific basis for exemptions.**

69. We are unclear about the financial consequences of the changes to the exemptions announced by HEFCE in January 2008. **We recommend that the Government in responding to this Report clarify the effect that the widening of the exemptions and the provision of additional resources for part-time students will have on £100 million earmarked for first-time students and whether resources will be taken from other parts of the higher education budget.**

## Reviews of exemptions

70. In oral evidence the Minister explained that there would be annual reviews of exemptions and that the first review would start in December 2008.<sup>133</sup> Given the concerns expressed about the exemptions and our conclusions about their inconsistencies, we consider that a comprehensive review is needed before December. Such a review should iron out the inconsistencies and put the exemptions on a secure footing. If the review is comprehensive and underpinned with consultation with the higher education sector, employers and interested parties, it could also obviate the need for annual reviews. **We recommend that the Government bring forward from December to the summer the**

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130 Ev 91; see also Ev 121–122 [Guildhall School of Music and Drama] and Ev 231–34 [Conservatoire for Dance and Drama].

131 Ev 220

132 See para 66, above.

133 Q 126

**first annual review of the exemptions for the withdrawal of funding for ELQ students, widen the terms of the review and carry out a full consultation as part of the review. We further recommend that the Government set out the financial consequences if the proposed reviews extend any exemptions; in particular, will there be offsetting withdrawal of exemptions for other ELQ students?**

## **Policing the arrangements**

71. Professor Latchman from Birkbeck raised concerns about the enforcement arrangements for the new policy on ELQs. He suggested that the only way that the policy could be implemented would be to maintain a database of students' qualifications. He argued that, if higher education institutions had to ask students to register whether they had an ELQ, universities would:

spend huge amounts of money on policing this system on behalf of the government because we will have to investigate qualifications, we will have to find out whether those things have been properly recorded, and there will be a huge incentive to students who graduated a number of years ago to lie because there is no national database that you have to check it with.<sup>134</sup>

72. The Minister replied that he would shortly be asking HEFCE for advice and then guidance would be issued.<sup>135</sup> He considered that most people did, and would, obey the rules, but that there would need to be a random checking process. In some cases universities might need to check with the previous employers and previous education establishments to corroborate that particular students did not have a first degree. He accepted that “we will have to do that in a way that we get the balance right between protection and not an overly bureaucratic system”.<sup>136</sup> He explained after the evidence session that in all cases HEFCE would work with institutions to audit feasible student numbers and final HEFCE funding would be determined on a basis of audited returns through a robust audit process.<sup>137</sup> Professor Eastwood said that HEFCE would offer good practice guidelines to institutions in March 2008 and confirmed that it would work with institutions to audit numbers, with final funding determined on the basis of audited returns.<sup>138</sup> He too envisaged that there would be “some additional dipstick-type checking mechanism in order to have a robust audit process”.<sup>139</sup>

**73. We recommend that the Government produce as a matter of urgency comprehensive and clear guidance for higher education institutions and students to ensure that they understand and follow the funding rules on fees for ELQ students. The guidance needs to clarify the responsibilities of higher education institutions, whether they have a duty of due diligence and who should bear the financial consequences for an**

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134 Q 19

135 Q 149 [Bill Rammell]

136 *Ibid.*

137 HC Deb, 25 February 2008, cols 1314–15W

138 Q 149 [Professor Eastwood]

139 *Ibid.*

**ineligible ELQ student who either unwittingly or by deception obtains government support for his or her fees.**

## 5 Conclusions

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74. The announcement of the decision in September 2007 to withdraw institutional funding for those studying for equivalent or lower qualifications has the appearance of a decision taken in some haste, the full effects of which and consequences for other policies such as the need for re-skilling have not been fully examined. The matter would have been better left until the independent review of variable fees due in 2009. The transitional arrangements and exemptions, while welcome, are inconsistent and may well prove inadequate. As the Government has decided to proceed with the changes to ELQ funding, the first annual review of the exemptions provides an opportunity for a full review of the scope and operation of the exemptions. We support the Government's aim of encouraging more first-time students to enter higher education; but without due analysis and evidence of the likely effectiveness and impact of the change, we cannot support the decision to cut funding to ELQ students in this way.

# List of conclusions and recommendations

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## Impact of withdrawal of HEFCE funding support

1. There can be little doubt that the withdrawal of HEFCE funding support for the tuition fees charged to ELQ students will increase substantially the fees such students will have to pay, if the full cost is passed on to them. (Paragraph 5)

## Written submissions to inquiries

2. We consider it unacceptable for there to be no memorandum provided from the Government. We expect government departments fully to comply with all reasonable requests for written submissions before they appear before us in future. (Paragraph 8)

## Policy on funding ELQ students

3. We accept that it is for ministers to decide priorities for funding and that it could be reasonable that public policy should give priority to students who have not studied for a first degree. This does require, however, a full rationale for, and justification of, the policy, scoping of its effects and a proper examination of possible unintended consequences, such as reducing the potential of adult learners to retrain and re-skill, which Leitch and others have argued is so vital, both on economic and social grounds. (Paragraph 11)
4. Where resources are switched in line with those priorities, it is the responsibility of ministers also to demonstrate that there is unmet demand and that the reallocation will produce outcomes in line with the Government's policy and without unforeseen or unacceptable consequences. (Paragraph 12)

## Justification for the policy

5. In our view, there is little evidence that withdrawing state funding for students taking ELQs in itself goes either with or against the grain of the recommendation in the Leitch Review of Skills to provide professional development with up-skilling and re-skilling as priorities. Furthermore, Leitch does not impel the Government to withdraw funding for ELQs nor require it to be maintained. We recommend that the Commission for Employment and Skills undertake a review of the effects of the withdrawal of institutional funding on ELQ students and the institutions which principally educate them. (Paragraph 17)
6. We recommend that the Government make explicit its policy to assist people looking to re-skill and obtain professional or technical development and that this must be done in time to contribute to the major review of fees policy and other higher education strategies which Government intends to undertake in 2009. (Paragraph 18)

7. In our view the Government has not shown convincing evidence that the withdrawal of funding for ELQ students and the phased re-allocation of the resources will meet its policy objective to encourage more suitably qualified individuals to start higher education for the first-time. In the absence of research on, or any analysis of, the groups to whom the redirected resources are targeted, we cannot see how the Government is certain that the funds taken from ELQ fees will meet their intended purpose efficiently or effectively. While we recognise that the expansion of the higher education sector has occurred in the teeth of substantial scepticism about the demand for, and value of, extra university places, we could find no convincing evidence that ELQ students were preventing access for first-time undergraduates or that there was a significant unmet demand from first-time undergraduates, though we accept that such evidence is not easy to collate. (Paragraph 23)
8. We conclude that the Government should have carried out a full analysis of unmet demand, including the annual 100,000 individuals who apply but do not enter higher education and of their reasons for not starting higher education, before it switched resources away from ELQ students. (Paragraph 24)
9. In their response to this report, we ask DIUS to explain what has happened to the £20 million the Minister said would be redistributed in 2008–09. We question the Government’s case that switching funding from ELQ students would increase opportunities for first-time graduates, in the apparent absence of newly funded extra places for first-time undergraduates in the first year of the scheme. We ask the Government to explain the rationale linking funding and places. (Paragraph 25)
10. We found no convincing evidence that “perpetual students” were absorbing public resources or impeding the access of other students to higher education. (Paragraph 26)

### Timing of the change

11. We see no evidence that there is a pressing reason to make the changes to ELQ funding in 2008–09 and believe that the Government should have waited for the 2009 review of fees, which would have been able to weigh funding of ELQs against other priorities. (Paragraph 29)

### Consultation on policy

12. The Committee accepts that the consultation on the implementation was open and that as a result DIUS and HEFCE have made some changes to the original package. We conclude, however, that DIUS should have carried out public consultation about the principle, merits and consequences of the policy rather than exclusively on the implementation of the package. (Paragraph 32)

### Part-time students

13. We saw no convincing evidence that part-time students would gain from the redistribution of funds away from ELQ students. We welcome and endorse the priority, and funding, that the Government has given to part-time students to

improve their skills and we recognise that the Government has made improvements in support for part-time students. However, overall support for part-time students remains precarious and we conclude that these proposals are in danger of undermining improvements and current progress. (Paragraph 37)

14. The result of the policy may be that, with an increased reliance on co-funding, employers will have greater influence over the choice of courses part-time students take. Those who are self-employed or who work for small or medium sized businesses will have reduced opportunity of co-funding. We have therefore concerns that the withdrawal of ELQ funding will remove the flexibility in the system that allows individuals without employers' support to acquire new skills to be able to change employment and meet the needs of a changing economy. (Paragraph 40)
15. We conclude that the Government needs to publish its policy as an employer on funding its employees' fees when they become ELQ students. (Paragraph 41)

### Impact assessment

16. We are disappointed that HEFCE appears not to have pressed the Government to allow it to carry out a full impact assessment study. We recommend that in future before embarking on major changes such as the withdrawal of ELQ funding, the Government ensure that a full sector assessment of the impact of the proposals is carried out and the results published with consultation exercises. (Paragraph 53)
17. We recommend that HEFCE publish the sector assessment of the impact of the policy of withdrawing funding for ELQ fees as soon as possible, in order to facilitate further analysis where necessary. (Paragraph 55)

### Data used by HEFCE for modelling

18. We recommend that HEFCE institute a speedy appeals system that will allow higher education institutions to challenge the data about ELQ students on which grant, including the safety net, is calculated. (Paragraph 57)

### Transitional arrangements

19. The Government needs to explain in detail how the safety net will work so that institutions can adequately plan their finances for the period of the transitional arrangements. In particular, the Government must clarify the points raised by Professor Latchman. (Paragraph 61)
20. In our view three years is an adequate period for transitional arrangements and the higher education sector as a whole could not reasonably expect a longer period. It should give most higher education institutions enough time to make adjustments to their courses and to attract first-time students to fill gaps left by withdrawal of ELQ funding. We recommend that this be the subject of a short, sharp, interim review by HEFCE, with whatever recommendations to Government prove necessary. (Paragraph 62)

21. We recognise that additional measures may be needed to assist those higher education institutions particularly badly hit by the withdrawal of funding for ELQ students and recommend that the Government provide for such additional measures. (Paragraph 63)

### Exemptions proposed by HEFCE

22. We welcome the immediate review of support for those studying theology as an ELQ and recommend that the Government exempt those studying theology as an ELQ from the withdrawal of funding. (Paragraph 66)
23. We conclude that the exemptions proposed by the Government are inconsistent and unsuitable for determining state support for the fees of ELQ students. We conclude that the Government ought to have asked HEFCE to design exemptions from the withdrawal of funding for ELQ students that aligned with the Leitch review to focus on students and courses likely to provide the greatest benefit to the economy or to meet skills shortages. Of the alternatives offered, by Birkbeck College for example, we conclude that the best case could be made for part-time students following courses that lead to re-training and hence value to the economy. Given the proposed policy of the Government, there is, however, no feasible alternative to the subject-specific basis for exemptions. (Paragraph 68)
24. We recommend that the Government in responding to this Report clarify the effect that the widening of the exemptions and the provision of additional resources for part-time students will have on £100 million ear-marked for first-time students and whether resources will be taken from other parts of the higher education budget. (Paragraph 69)

### Reviews of exemptions

25. We recommend that the Government bring forward from December to the summer the first annual review of the exemptions for the withdrawal of funding for ELQ students, widen the terms of the review and carry out a full consultation as part of the review. We further recommend that the Government set out the financial consequences if the proposed reviews extend any exemptions; in particular, will there be offsetting withdrawal of exemptions for other ELQ students? (Paragraph 70)

### Policing the arrangements

26. We recommend that the Government produce as a matter of urgency comprehensive and clear guidance for higher education institutions and students to ensure that they understand and follow the funding rules on fees for ELQ students. The guidance needs to clarify the responsibilities of higher education institutions, whether they have a duty of due diligence and who should bear the financial consequences for an ineligible ELQ student who either unwittingly or by deception obtains government support for his or her fees. (Paragraph 73)

## Conclusions

27. The announcement of the decision in September 2007 to withdraw institutional funding for those studying for equivalent or lower qualifications has the appearance of a decision taken in some haste, the full effects of which and consequences for other policies such as the need for re-skilling have not been fully examined. The matter would have been better left until the independent review of variable fees due in 2009. The transitional arrangements and exemptions, while welcome, are inconsistent and may well prove inadequate. As the Government has decided to proceed with the changes to ELQ funding, the first annual review of the exemptions provides an opportunity for a full review of the scope and operation of the exemptions. We support the Government's aim of encouraging more first-time students to enter higher education; but without due analysis and evidence of the likely effectiveness and impact of the change, we cannot support the decision to cut funding to ELQ students in this way. (Paragraph 74)

# Formal Minutes

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**Monday 17 March 2008**

Members present:

Mr Phil Willis, in the Chair

Mr Tim Boswell

Dr Evan Harris

Mr Ian Cawsey

Dr Brian Iddon

Dr Ian Gibson

Mr Gordon Marsden

## ***1. Withdrawal of funding for equivalent or lower level qualifications***

The Committee deliberated.

Draft Report (*Withdrawal of funding for equivalent or lower level qualifications*), proposed by the Chairman, brought up and read.

*Ordered*, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 22 read and agreed to.

Paragraph 23 read as follows:

In our view the Government has not shown convincing evidence that the withdrawal of funding for ELQ students and the phased re-allocation of the resources will meet its policy objective to encourage more suitably qualified individuals to start higher education for the first-time. In the absence of research on, or any analysis of, the groups to whom the redirected resources are targeted, we cannot see how the Government is certain that the funds taken from ELQ fees will meet their intended purpose efficiently or effectively. While we recognise that the expansion of the higher education sector has occurred in the teeth of substantial scepticism about the demand for, and value of, extra university places, we could find no convincing evidence that ELQ students were preventing access for first-time undergraduates or that there was a significant unmet demand from first-time undergraduates, though we accept that such evidence is not easy to collate.

Amendment proposed, in line 11, delete from “undergraduates” to the end of the sentence and add: “It seems to us that the Government could have carried out the research into unmet demand from unsuccessful applicants as set out in their memorandum (see paragraph 21) and to use the household or labour force surveys to establish any unmet demand from first-time students who have never applied to university.”—(*Dr Evan Harris.*)

Question put, That the Amendment be made.

The Committee divided.

Ayes, 1

Noes, 5

Dr Evan Harris

Mr Tim Boswell  
Mr Ian Cawsey  
Dr Ian Gibson  
Dr Brian Iddon  
Mr Gordon Marsden

Paragraph agreed to.

Paragraphs 24 to 73 read and agreed to.

Paragraph 74 read as follows:

The announcement of the decision in September 2007 to withdraw institutional funding for those studying for equivalent or lower qualifications has the appearance of a decision taken in some haste, the full effects of which and consequences for other policies such as the need for re-skilling have not been fully examined. The matter would have been better left until the independent review of variable fees due in 2009. The transitional arrangements and exemptions, while welcome, are inconsistent and may well prove inadequate. As the Government has decided to proceed with the changes to ELQ funding, the first annual review of the exemptions provides an opportunity for a full review of the scope and operation of the exemptions. We support the Government's aim of encouraging more first-time students to enter higher education; but without due analysis and evidence of the likely effectiveness and impact of the change, we cannot support the decision to cut funding to ELQ students in this way.

Amendment proposed, in line 10, delete from "education" to the end of the sentence and insert: "but we believe that the decision to cut funding to ELQ students in this way should have followed due analysis and evidence of the likely effectiveness and impact of the change."—(*Mr Ian Cawsey.*)

Question put, That the Amendment be made.

The Committee divided.

Ayes, 2

Noes, 4

Mr Ian Cawsey  
Dr Ian Gibson

Mr Tim Boswell  
Dr Evan Harris  
Dr Brian Iddon  
Mr Gordon Marsden

Paragraph agreed to.

Summary agreed to.

*Resolved*, That the Report be the Third Report of the Committee to the House.

*Ordered,* That the Chairman make the Report to the House.

*Ordered,* That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

Written evidence was ordered to be reported to the House for printing with the Report.

[Adjourned till Wednesday 19 March at 9.00 am

# Witnesses

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**Thursday 17 January 2008**

*Page*

**Professor Brenda Gourley**, Vice-Chancellor, Open University, **Professor David Latchman**, Master, Birkbeck College, University of London, **Ms Gemma Tumelty**, National President, National Union of Students, and **Ms Sally Hunt**, General Secretary, University and College Union

Ev 1

**Bill Rammell MP**, Minister for Lifelong Learning, Further and Higher Education, Department for Innovation, Universities and Skills (DIUS), and **Professor David Eastwood**, Chief Executive, Higher Education Funding Council for England (HEFCE)

Ev 9

## List of written evidence

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1	Open University	Ev 23, 264
2	National Union of Students	Ev 35
3	Professor David Latchman, Master of Birkbeck College, University of London	Ev 39, 265
4	University and College Union	Ev 43
5	Milton Contact	Ev 52
6	School of Pharmacy and Chemistry, Liverpool John Moores University	Ev 53
7	Helen Lintell, Student Services Manager, Open University in the South West	Ev 53
8	Million +	Ev 54
9	Institute of Fund Raising	Ev 61, 253
10	Royal Veterinary College, University of London	Ev 62
11	British Association for Counselling and Psychotherapy	Ev 64
12	City of Westminster College	Ev 65
13	Council of University Classical Departments	Ev 66
14	Office of the City Remembrancer	Ev 67
15	Y Action	Ev 67
16	Association of Chartered Certified Accountants	Ev 68
17	Council for Industry and Higher Education	Ev 70
18	Chartered Management Institute	Ev 71
19	Institute of Ecology and Environmental Management	Ev 73
20	Open University Students Union	Ev 74
21	Kings College London	Ev 78
22	British Society for Immunology	Ev 81
23	Skill: National Bureau for Students with Disabilities	Ev 81
24	Microsoft	Ev 82
25	University of East London	Ev 83
26	WEA Maidenhead Branch	Ev 86
27	Institute of Psychiatry, King's College London	Ev 87
28	Community and Youth Work Training Agencies Group	Ev 87
29	Education Sub-Committee of the Geological Society of London	Ev 88
30	British Computer Society	Ev 88
31	Institute for Orthodox Christian Studies, Cambridge	Ev 90
32	Conservatoires UK	Ev 91
33	English Association	Ev 93
34	Rt Revd Graham James, Lord Bishop of Norwich and Chairman of the Ministry Division of the Archbishops Council	Ev 94
35	Cambridge Theological Federation	Ev 95
36	University of Oxford	Ev 97
37	Heads of Department of Mathematical Sciences	Ev 99
38	Public and Commercial Services Trade Union	Ev 101
39	Council for the Mathematical Sciences	Ev 102
40	Heythrop College, University of London	Ev 104
41	Relate Institute	Ev 105

42	London Chamber of Commerce and Industry	Ev 107
43	University of Kent	Ev 108
44	University of Cumbria	Ev 110
45	Campaign for Learning	Ev 111
46	UKRC for Women in Science, Engineering and Technology	Ev 114
47	Tavistock and Portman NHS Foundation Trust	Ev 119
48	Guildhall School of Music & Drama	Ev 121
49	Merseytravel	Ev 122
50	Portia	Ev 125
51	Society of St Thomas & St Augustine	Ev 127
52	Council of University Heads of Pharmacy	Ev 127
53	National Institute of Adult Continuing Education	Ev 129
54	School of Pharmacy, University of London	Ev 131
55	Prospect	Ev 132
56	Churches Main Committee	Ev 133
57	Association of Colleges	Ev 134
58	e-skills UK	Ev 137
59	London Higher	Ev 139
60	Bradford College	Ev 140
61	Council of Professors and Heads of Computing	Ev 142
62	GuildHE	Ev 146
63	British Psychological Society	Ev 150
64	TUC	Ev 153
65	Universities Association for Lifelong Learning	Ev 153
66	British Ecological Society	Ev 158
67	Institute of Physics	Ev 160
68	Institute of Education, University of Leeds	Ev 164
69	Birkbeck College Student Union Council	Ev 167
70	1994 Group	Ev 172
71	University of Liverpool	Ev 174
72	European Research into Consumer Affairs	Ev 177
73	Universities UK	Ev 178
74	Women's Budget Group	Ev 182
75	University of Teesside	Ev 185
76	Arts Council England	Ev 189
77	Midlands Energy Consortium (Birmingham, Loughborough and Nottingham Universities)	Ev 190
78	British Association of Psychotherapists	Ev 196
79	Science Council	Ev 198
80	Revd David A Neaum	Ev 202
81	Royal Pharmaceutical Society of Great Britain	Ev 203
82	Campaign for Science & Engineering	Ev 204
83	Oxford Partnership for Theological Education and Training	Ev 204
84	Arts Institute at Bournemouth	Ev 207
85	Master of Fine Arts in Theatre Directing, Birkbeck College	Ev 208

86	Society for Old Testament Study	Ev 210
87	British Philosophical Association	Ev 210
88	Westminster College, Cambridge	Ev 211
89	Archaeology Training Forum	Ev 212
90	Anglia Ruskin University	Ev 214
91	Revd Canon Gordon Oliver, Director of Ministry and Training, Diocese of Rochester	Ev 216
92	Association of MBAs	Ev 217
93	University of Sunderland	Ev 218
94	British Association for Applied Linguistics	Ev 220
95	Bloomsbury College of the University of London	Ev 221
96	Thames Valley University	Ev 223
97	School of Philosophy, Birkbeck College	Ev 226
98	University of Southampton	Ev 226
99	University of Warwick	Ev 228
100	Edexcel	Ev 229
101	Shap Working Party on World Religions in Education	Ev 229
102	Conservatoires for Dance and Drama	Ev 231
103	Law Society	Ev 234
104	English Heritage	Ev 236
105	National Youth Agency	Ev 238
106	Royal Pharmaceutical Society	Ev 239
107	CBI	Ev 240
108	University of Cambridge	Ev 241
109	Professor Graham Turpin, Clinical Psychology Unit, University of Sheffield	Ev 243
110	UNISON	Ev 245
111	University of Bolton	Ev 246
112	Association of Business Schools	Ev 249
113	London First	Ev 250
114	Swindon College	Ev 252
115	Oxford University, Department for Continuing Education	Ev 258
116	Council for College and University English	Ev 259
117	Sir Richard Stapley Educational Trust	Ev 259
118	John Bowis MEP	Ev 260
119	University of the Arts, London	Ev 260
120	Lord Leitch	Ev 264

## List of unprinted evidence

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The following memoranda have been reported to the House, but to save printing costs they have not been printed and copies have been placed in the House of Commons Library, where they may be inspected by Members. Other copies are in the Parliamentary Archives, and are available to the public for inspection. Requests for inspection should be addressed to The Parliamentary Archives, Houses of Parliament, London SW1A 0PW (tel. 020 7219 3074). Opening hours are from 9.30 am to 5.00 pm on Mondays to Fridays.

1	ELQ 02 Elizabeth Brown, King Edward VI Handsworth School, Birmingham	32	ELQ 43 Amy Theerman
2	ELQ 04 Donald Hedges	33	ELQ 45 Jessica Hyde
3	ELQ 06 Katherine Helps	34	ELQ 46 Bob Meadows
4	ELQ 07 Dr Stephen Dobson	35	ELQ 47 Andrew Fawcett
5	ELQ 08 Michael Allen, Associate Lecturer, Open University	36	ELQ 48 Michael Wellby
6	ELQ 09 Alan Slomson	37	ELQ 49 Tom Wade
7	ELQ 10 Jim Mackison	38	ELQ 50 Lauran Doak
8	ELQ 12 Bob Crawford	39	ELQ 51 Lynda Gold
9	ELQ 14 Denis R Smith	40	ELQ 52 Yvonne Park
10	ELQ 17 Bryan Moore	41	ELQ 53 Sylvia Pyne
11	ELQ 18 Bonnie Joyce	42	ELQ 54 Brian Longstaff
12	ELQ 19 Alex Keel	43	ELQ 55 Adrian Dean
13	ELQ 20 Kym Pendered	44	ELQ 56 Charles Gordon Clark
14	ELQ 21 Martin Paul Coss	45	ELQ 57 A W Allcock
15	ELQ 22 Richard Cooper	46	ELQ 58 John Shipton
16	ELQ 23 Kristina Bennert	47	ELQ 59 Dr David Mercer
17	ELQ 24 Sharon Lockwood	48	ELQ 60 David Waters
18	ELQ 25 Martin Breslin	49	ELQ 61 June Traill
19	ELQ 26 Julian Ashbourn	50	ELQ 62 Barbara Dye
20	ELQ 27 Emma Sullivan	51	ELQ 63 Evan Haynes
21	ELQ 28 Rex Mackrill	52	ELQ 64 Susan Pollard
22	ELQ 29 Keith Moyse	53	ELQ 65 Dr Pelvender Singh Gill
23	ELQ 30 Steve Ward	54	ELQ 66 Neil Buckle
24	ELQ 31 Linda Shipley	55	ELQ 67 Rosemary Mullen
25	ELQ 33 Paul F Moran	56	ELQ 68 Joanne Harris
26	ELQ 35 Tim Lambert	57	ELQ 69 Mike Green
27	ELQ 36 Phil Dalton	58	ELQ 70 Brian Durrant
28	ELQ 37 Harry Noyes	59	ELQ 71 D J Gilbey
29	ELQ 40 David Millard, Emeritus Fellow of Green College, Oxford	60	ELQ 72 Anthony Matthew
30	ELQ 41 David McDermott	61	ELQ 73 Lincoln Allen
31	ELQ 42 Ledger White	62	ELQ 74 Dr Paul Garcia
		63	ELQ 75 Victoria Barker
		64	ELQ 76 Tracy Broadbent
		65	ELQ 77 Nadia Jeffreys

66	ELQ 78 Mary Fitzgerald	111	ELQ 124 Brian Crammon
67	ELQ 79 Pat Coldwell	112	ELQ 125 Emma Garwood
68	ELQ 80 Michael Eustace	113	ELQ 126 John Newman
69	ELQ 81 Michael Slater	114	ELQ 127 Dominique Jethwa
70	ELQ 82 Tony Trueman	115	ELQ 128 Victor Johnstone
71	ELQ 83 Janet Herdman	116	ELQ 129 Lisa Bretherton
72	ELQ 84 Zahida Azam	117	ELQ 136 Carol Long
73	ELQ 85 Prudence Morrison	118	ELQ 139 Kate Graham
74	ELQ 86 Anthony Sneider	119	ELQ 140 John Monk, Open University
75	ELQ 88 Delphina Dendy	120	ELQ 141 Al Edmonds
76	ELQ 89 Christine Buckberry	121	ELQ 143 Jim Mackison
77	ELQ 90 Donald Komrower	122	ELQ 144 Susan Fewster
78	ELQ 91 Miland Joshi	123	ELQ 147 Heather Wood
79	ELQ 92 Jim Edgar	124	ELQ 148 Paul Grover
80	ELQ 93 Tony Baxter	125	ELQ 149 Dr Isabel Davis, Birkbeck
81	ELQ 94 Keith Javes	126	ELQ 150 John Wildman
82	ELQ 95 John Taylor	127	ELQ 151 Jonathan Brooke
83	ELQ 96 Margretta Finnegan	128	ELQ 152 Ian Russell
84	ELQ 97 Phil Older	129	ELQ 153 Gary Cook
85	ELQ 98 Christina Stevenson	130	ELQ 154 Michael McEllin
86	ELQ 99 Annie Hoskins	131	ELQ 155 Adam Ogilvie-Smith
87	ELQ 100 John Warden	132	ELQ 156 Duncan Hall
88	ELQ 101 Jenny Furber	133	ELQ 157 Matthew Smart
89	ELQ 102 Janet Flint	134	ELQ 158 M Hinshelwood
90	ELQ 103 Jo Allaway	135	ELQ 159 Andrew Peck
91	ELQ 104 Kathryn Brooks	136	ELQ 160 Julie Roberts
92	ELQ 105 Steve McNeice	137	ELQ 161 Gaby Charing
93	ELQ 106 James Loveday	138	ELQ 162 Hannah Bristow
94	ELQ 107 Diana Milne	139	ELQ 163 Mark Beeby
95	ELQ 108 Elaine Whitaker	140	ELQ 164 Richard Fisher
96	ELQ 109 Pauline Bateman	141	ELQ 165 Esta Jacobs
97	ELQ 110 Michele Booth	142	ELQ 166 Ann Clark
98	ELQ 111 Helen Pletts	143	ELQ 167 Robert Talboys
99	ELQ 112 Caroline Aston	144	ELQ 168 Dawn Mills
100	ELQ 113 Esta Impey-Martin	145	ELQ 169 Paul Cherry
101	ELQ 114 Jo Farquar	146	ELQ 170 Marion Carter
102	ELQ 115 Stephanie Wilson	147	ELQ 171 Maighread Gough
103	ELQ 116 Jacqueline Godfrey	148	ELQ 172 Emma Evans
104	ELQ 117 Rowena Gardner	149	ELQ 174 Derrick Hodson
105	ELQ 118 Sarah Francis	150	ELQ 175 Philip Stapleton
106	ELQ 119 Jean Willmott	151	ELQ 176 Julia Shay
107	ELQ 120 Tanya Wood	152	ELQ 177 Chris Pateman
108	ELQ 121 Janet Chow	153	ELQ 178 Melvyn Jones
109	ELQ 122 Clare Edholn	154	ELQ 179 Paul Gethin
110	ELQ 123 Christine Dolan		

155	ELQ 180 Sally Watts	199	ELQ 227 Ian Last
156	ELQ 181 Hilary Pegg	200	ELQ 228 Marion Sheppard
157	ELQ 182 Richard Crawford	201	ELQ 229 Ms Lesley Sams
158	ELQ 183 Maurice Greenham	202	ELQ 230 Dr Jacqueline Bower
159	ELQ 184 Wendy Berry	203	ELQ 231 Peter Wood
160	ELQ 185 Erica Johnson	204	ELQ 232 Charles Hopkins
161	ELQ 186 Eileen Dale	205	ELQ 233 J A Fish
162	ELQ 187 Gillian Beattie-Smith	206	ELQ 234 Mrs Beverley Barton
163	ELQ 188 Mike Barford	207	ELQ 235 James O'Neill
164	ELQ 189 Deryck Hillas	208	ELQ 236 Bernard Duffy
165	ELQ 190 John Aherne	209	ELQ 237 Marie Brydon
166	ELQ 191 Sherry Golding	210	ELQ 239 Elaine Holland
167	ELQ 192 David Morson	211	ELQ 240 Don Crawford
168	ELQ 193 Mike Haley	212	ELQ 241 Catherine Waddington
169	ELQ 194 John Hunt	213	ELQ 242 Max Majendie
170	ELQ 195 Norman Castleton	214	ELQ 243 James Morrison
171	ELQ 196 Chris Swain	215	ELQ 247 Jonathan King
172	ELQ 197 Patricia McKay	216	ELQ 248 Oliver Ashmore
173	ELQ 199 Keith Barrett	217	ELQ 249 Jillian Lipscombe
174	ELQ 200 Eileen Austin	218	ELQ 250 Peter Munn
175	ELQ 201 Louise Wall	219	ELQ 255 Chris Fox
176	ELQ 202 Christopher Fermor	220	ELQ 256 Tony Brown
177	ELQ 203 Louise Russell	221	ELQ 257 Richard Correll
178	ELQ 204 Rose Prentice	222	ELQ 258 Matthew Pringle
179	ELQ 205 Catherine Wells	223	ELQ 259 Robert Harkess
180	ELQ 206 Lucy Gettins	224	ELQ 260 Claire Everitt
181	ELQ 207 Radke Platte	225	ELQ 261 Julie Pavett
182	ELQ 208 Jessica Jeffrey	226	ELQ 262 Jo Hibbard
183	ELQ 210 Margaret Smart (Former Chief Inspector of Higher Education within HM Inspectorate)	227	ELQ 263 Rowland Foote, Principal and Chief Executive, Doncaster College
184	ELQ 211 Paul Featherstone	228	ELQ 264 Stephen Murray
185	ELQ 212 Mike McIntyre	229	ELQ 265 Michael Walker
186	ELQ 213 Helen Davies	230	ELQ 266 Nicola Harrison
187	ELQ 214 Bill Robinson	231	ELQ 267 Roger Gedye
188	ELQ 215 John Fox	232	ELQ 268 Michael Joacobs
189	ELQ 217 Ormond Simpson	233	ELQ 269 John Skipper
190	ELQ 218 Tracey Wiffen	234	ELQ 270 Sheila Fisher
191	ELQ 219 Conan Norton	235	ELQ 272 John Andrew Charters
192	ELQ 220 David Hall	236	ELQ 273 Karen Button
193	ELQ 221 Shaun Murray	237	ELQ 274 Craig Baker
194	ELQ 222 Esther Williams	238	ELQ 275 Suzanne Wilcox
195	ELQ 223 Becky Stothart	239	ELQ 276 Wendy Greenland
196	ELQ 224 Paul Schwer	240	ELQ 277 Karen Horsley
197	ELQ 225 Frank Hughes	241	ELQ 278 Bernard Rooney
198	ELQ 226 Donald Fay	242	ELQ 279 Paul Martin

243	ELQ 280 Craig Foster	287	ELQ 344 Dr David Huen.doc
244	ELQ 282 Mrs Pat Jones	288	ELQ 347 Linda Neate
245	ELQ 283 Tom Hudson	289	ELQ 349 David Atkins
246	ELQ 284 Dr Barnett	290	ELQ 351 George Riches
247	ELQ 300 Ellie Rickman	291	ELQ 352 Marco Georgiou
248	ELQ 301 Dr Alexander Douglas	292	ELQ 354 Barbara Hateley
249	ELQ 302 Lionel Sacks	293	ELQ 356 Hannah Dulieu
250	ELQ 303 Helen Lloyd	294	ELQ 361 Susannah Cowton
251	ELQ 305 Dr R Higgins	295	ELQ 361A Susannah Cowton
252	ELQ 306 Derek Johns	296	ELQ 363 Eric Pritchard
253	ELQ 307 Ivan Keeling	297	ELQ 364 Daniel Banks
254	ELQ 308 Robert McCord	298	ELQ 376 Peter Telford
255	ELQ 309 Johanna Stimpson	299	ELQ 405 Louise Green
256	ELQ 311 Ruth Talbot	300	ELQ 406 Nick Dibben
257	ELQ 313 Martin Watts	301	ELQ 408 R T Hutchinson
258	ELQ 314 Jackie Stanley	302	ELQ 409 Carol Smith
259	ELQ 315 Nick Gilbert	303	ELQ 410 Elizabeth Theokritoff
260	ELQ 316 Sally McMahon	304	ELQ 411 Kate Cummings
261	ELQ 317 Penelope Bray	305	ELQ 415 Jo Richards
262	ELQ 318 Heather Hobden	306	ELQ 416 Mark Huitson
263	ELQ 319 Patrick Rossiter	307	ELQ 417 Ian Mackay
264	ELQ 320 Michael Aicken	308	ELQ 418 David Pulley
265	ELQ 321 Clare Gouldstone	309	ELQ 419 Rachel Wiggans
266	ELQ 322 Gyn Davies	310	ELQ 420 Sandra Roberts
267	ELQ 323 Richard Berry	311	ELQ 421 Graham Page
268	ELQ 324 Karen Bannister	312	ELQ 422 Janet Cormack
269	ELQ 325 Dave Draper	313	ELQ 423 Reg Rea
270	ELQ 325 A Dave Draper	314	ELQ 431 Bella Tiwari
271	ELQ 326 Walt Bugden	315	ELQ 434 Graham Ranger
272	ELQ 327 Martin Benzing	316	ELQ 435 Diana Smith
273	ELQ 328 Rosemary Lane	317	ELQ 436 Andrew Cormack
274	ELQ 329 David Hall	318	ELQ 437 Susan Devine
275	ELQ 330 Ann Lakin	319	ELQ 438 James Lamb
276	ELQ 331 John Wilson	320	ELQ 439 Despo Speel
277	ELQ 332 Jonathan Clennell	321	ELQ 440 Clare Higgins
278	ELQ 333 Mervyn Wilson	322	ELQ 441 John Richard Jones
279	ELQ 334 Carol Groombridge	323	ELQ 442 Joanna Greenwell
280	ELQ 335 Ruth Darby	324	ELQ 443 Dr John Godfrey
281	ELQ 336 Mark Corney	325	ELQ 444 Imogen Nay
282	ELQ 337 Cheryl McKendrick	326	ELQ 445 Robert Marshall
283	ELQ 338 Mike Hally	327	ELQ 446 Rachel Bream
284	ELQ 339 Sue Dickerson	328	ELQ 447 Ellen Wakeham
285	ELQ 340 Robyn Ainsworth	329	ELQ 448 Judith James
286	ELQ 341 Margaret and Stephen Hilditch	330	ELQ 449 Jo Berriman
		331	ELQ 450 Amy Price

332	ELQ 451 Mark Ingall	351	ELQ 470 Mickey Randall
333	ELQ 452 Bronislaw Najduch	352	ELQ 471 P Duffield
334	ELQ 453 Kevin Lambert	353	ELQ 472 Michael Cooke
335	ELQ 454 Robin Richmond	354	ELQ 473 Elizabeth Reavill
336	ELQ 455 Margaret Coombs	355	ELQ 474 Peter Mellor
337	ELQ 456 Anthony Brown	356	ELQ 475 Dorothy Wright
338	ELQ 457 Hirono Angold	357	ELQ 476 Bill Bradbeer
339	ELQ 458 Mike Bryce	358	ELQ 477 Michael Ayton
340	ELQ 459 Anthony Glazebrook	359	ELQ 478 Carol Haynes
341	ELQ 460 Colin Price	360	ELQ 479 Jennifer Burnett
342	ELQ 461 Isable Darling	361	ELQ 480 Lesley Kane
343	ELQ 462 Anne Williams	362	ELQ 481 Helen Wallace
344	ELQ 463 Jeremy Parsons	363	ELQ 482 Peter Savage
345	ELQ 464 Simon Wilson	364	ELQ 483 Tim Rigley
346	ELQ 465 Piers Burnham	365	ELQ 484 Jonny Hirst
347	ELQ 466 Jennifer Yates	366	ELQ 486 Steve Debnam
348	ELQ 467 Mary Bush	367	ELQ 489 K T Anandakumar
349	ELQ 468 Maureen Mackintosh	368	ELQ 495 Sarah-Jane Smith
350	ELQ 469 Jessica Saraga		

## List of Reports from the Committee during the current Parliament

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### Session 2007–08

First Report	UK Centre for Medical Research and Innovation	HC 185
Second Report	The work and operation of the Copyright Tribunal	HC 245
First Special Report	The Funding of Science and Discovery Centres: Government Response to the Eleventh Report from the Science and Technology Committee, Session 2006–07	HC 214
Second Special Report	The Last Report: Government Response to the Thirteenth Report from the Science and Technology Committee, Session 2006–07	HC 244