

Cylchlythyr | Circular

Monitoring and Evaluation of 2018/19 Fee and Access Plans

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To: Regulated institutions and other interested parties
Response by: **24 January 2020**
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This circular sets out how HEFCW will monitor and evaluate the 2018/19 fee and access plans, including details of the information regulated institutions are required to submit to HEFCW.

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Introduction

1. This circular sets out how HEFCW will monitor and evaluate the 2018/19 fee and access plans, including details of the information regulated institutions are required to submit to HEFCW.
2. Monitoring and evaluation of fee and access plans enables HEFCW to assess whether regulated institutions have complied with the fee limits and with the general requirements of their fee and access plan, as well as being effective in improving equality of opportunity and promoting higher education.
3. Our monitoring and evaluation will include requiring regulated institutions to submit compliance and effectiveness reports to us. Compliance and effectiveness report templates are attached at **Annexes A and B**.

Background

4. Outcomes of HEFCW's monitoring and evaluation will be reported to Welsh Ministers as part of HEFCW's annual report to Welsh Ministers setting out how HEFCW has exercised its functions under the Higher Education (Wales) Act 2015. This report will be laid before the National Assembly for Wales. The report will draw attention to any non-compliance issues from regulated institutions, outline where institutions have not met the general requirements of the plan or where the plans have been ineffective. In future reporting, it will also highlight areas of good practice, where the general requirements have been met and where plans have been particularly effective.
5. Failure to comply with fee levels or a general requirement of a fee and access plan could ultimately lead to HEFCW either directing an institution to reimburse excess fees, refusing to approve a future fee and access plan or withdrawing an approved fee and access plan. We would expect these steps to be a last resort. HEFCW's Statement of Intervention¹ sets out these processes in further detail. In the event that an institution does not demonstrate sufficient progress in improving equality of opportunity or promoting higher education in Wales, HEFCW may require the institution to increase the proportion of full-time undergraduate fee income invested in those areas in future fee and access plans.
6. HEFCW's evaluation of the effectiveness of the 2018/19 fee and access plans will identify areas where regulated institutions may need to improve their plans to promote equality of opportunity and higher education more effectively.
7. Part of HEFCW's regulatory role is to identify good practice relating to improving equality of opportunity and the promotion of higher education and give information and advice to regulated institutions about such

¹ [HEFCW, Statement of Intervention, October 2016](#)

practice. This aspect of our evaluation will become a stronger feature of our monitoring and evaluation in the future and as fee and access plans develop.

8. HEFCW's information and advice must be taken account of by regulated institutions. In taking forward its duties, HEFCW will, amongst other things, oversee the monitoring and evaluation of fee and access plans, commission independent evaluations on fee and access plans and hold seminar events.
9. [HEFCW's Regulation Committee](#) will provide advice to Council on how Council discharges its regulatory functions as they relate to approving plans and monitoring and evaluating plans.
10. In future years, there may be changes to the monitoring and evaluation of fee and access plans to improve the process, take account of lessons learned or respond to externally commissioned reviews.

Monitoring and Evaluation

11. The Higher Education (Wales) Act 2015 requires HEFCW to:
 - a) monitor compliance with regulated fee limits;
 - b) monitor compliance with the general requirements of the approved plans;
 - c) evaluate the effectiveness of each plan; and
 - d) evaluate the effectiveness of all plans generally.
12. This section sets out how HEFCW will monitor and evaluate each of these areas. HEFCW's monitoring and evaluation will primarily draw upon information submitted by regulated institutions. Information submitted by regulated institutions will be supplemented by: HEFCW data analysis, including analysis of Student Loans Company (SLC) and Higher Education Statistics Agency (HESA) data, where appropriate; HESA performance indicators and HEFCW Corporate Strategy targets, where appropriate; and the evaluation outcomes and recommendations of the [Advance HE review of fee and access plans](#).
13. HEFCW will share with each regulated institution a pre-populated template indicating the additional information we require. The template consists of a Word document and two Excel worksheets. Generic blank templates are attached for information at **Annex A** and **Annex B**. The Word document asks for information to enable HEFCW to monitor compliance and evaluate effectiveness of the plan and the Excel worksheets collect information about expenditure by category and progress towards targets.
14. We recognise that actual student recruitment and investment may differ from that provided as forecast information in the approved fee and access plan. However, we expect that the proportion of investment committed to equality of opportunity and the promotion of HE, including student support, will remain the same. Where total investment is reduced and any

commitments altered since the approved plan, we will expect a detailed narrative to set out clearly the reasons for changes. We expect all commitments to students to be honoured.

Monitoring compliance with regulated fee limits

15. HEFCW will analyse data from HESA and the SLC to assess whether regulated institutions charged fees in excess of the fee limits set out in approved fee and access plans.
16. Each regulated institution will be required, in the templates, to confirm that it did not charge fees in excess of the fee limits it set out in its 2018/19 approved fee and access plan. A narrative must set out the institution's processes for ensuring excess fees were not charged and details of how governing bodies were assured of this. Some providers will have multiple fee limits relating to provision delivered directly, provision delivered on its behalf, sandwich years out and overseas placements. All fees will need to be accounted for.
17. In the event that an institution did charge fees in excess of the fee limits set out in its approved fee and access plan, the regulated institution must signal how it became aware of the excess fees charged and the action taken to resolve that. In the event that the institution has not taken appropriate action to reimburse excess fees HEFCW may consider initiating an intervention under its Statement of Intervention.

Monitoring compliance with the general requirements of the approved plans

18. The general requirements of a fee and access plan are the provisions that Welsh Government require a governing body to include in its fee and access plan². These are that governing bodies:
 - a) take, or to secure the taking of, measures to attract applications from prospective students who are members of under-represented groups;
 - b) take, or to secure the taking of, measures to retain students who are members of under-represented groups;
 - c) provide, or to secure the provision of, financial assistance to students;
 - d) make available to students or prospective students information about financial assistance available to students from any source, or to secure that such information is made available;
 - e) inform any prospective student, before the student commits to undertaking a course, of the aggregate amount of fees that the institution will charge for the completion of the course, or to secure that any prospective student is so informed;
 - f) monitor compliance with the provisions of the plan; and
 - g) monitor progress in achieving the objectives set out in the plan.
19. Regulated institutions must confirm whether they have fulfilled these requirements. Institutions must set out their actions and processes to

² www.legislation.gov.uk/wsi/2015/1498/pdfs/wsi_20151498_mi.pdf

demonstrate how they met these requirements and gained assurances that the requirements were met. Where the general requirements of fee and access plans have not been met, institutions must provide a clear explanation about all reasonable steps taken to avoid non-compliance with the general requirement of the plan. In the event that the institution has not taken all reasonable steps to comply, HEFCW may consider initiating intervention under its Statement of Intervention.

Evaluating the effectiveness of each plan

20. To evaluate the effectiveness of each 2018/19 fee and access plan, we require institutions' to report on the total fee and access plan investment in improving equality of opportunity and promoting higher education. Reporting should be against the Welsh Government's categories of provision and against targets set in the 2018/19 fee and access plans.
21. Additionally, we require regulated institutions to provide a critical review of the effectiveness of their plans. We will expect the critical review to:
 - assess performance against targets;
 - identify activities that contributed towards achieving the plan's objectives;
 - identify activities that failed to contribute fully towards achieving the plan's objectives and lessons learned; and
 - assess how student fee income was most effectively invested to meet the fee and access plan objectives.
22. Institutions must submit the frameworks they have used to evaluate the 2018/19 fee and access plans with this submission. The frameworks should set out how institutions will assess fee and access plans' success or otherwise over time, including how plans' development will be informed by evaluation outcomes.

Evaluating the effectiveness of all plans

23. HEFCW will assess all compliance and effectiveness reports to determine how effective regulated institutions as a whole have been in promoting equality of opportunity and higher education across Wales.

Monitoring and Evaluation Submissions

24. The deadline to submit the monitoring and evaluation report is **Friday 24 January 2020**.
25. Submissions should be uploaded to our secure site at www.hefcw.ac.uk/uploadfap.aspx.
26. In submitting the monitoring and evaluation reports, regulated institutions must include confirmation from the governing body that they have

approved the report, that the contents of the report are accurate at the time of writing and they are based on verifiable data.

27. We will undertake an initial analysis of the compliance and effectiveness reports in February and March and will return to institutions should we require further information. We intend to discuss the outcomes of this exercise with our Regulation Committee at its meeting in May. This will inform consideration of 2021/22 fee and access plan submissions.

Further information / responses to

28. For further information, contact Steve Williams (029 2085 9744; steven.williams@hefcw.ac.uk).