

# Cylchlythyr | Circular

## 2022/23 Fee and access plan application guidance

**Date:** 25 June 2021  
**Reference:** W21/20HE  
**To:** Governing bodies of institutions in Wales seeking regulation by HEFCW to become automatically designated for their full-time and PGCE (QTS) courses for 2022/23  
**Contact:** [regulationadvice@hefcw.ac.uk](mailto:regulationadvice@hefcw.ac.uk)

HEFCW is publishing this guidance to support institutions applying for a fee and access plan. Welsh Government's aim is for fee and access plans to make a significant and lasting contribution to widening access to higher education in Wales.

Approved fee and access plans are the means by which institutions become regulated by HEFCW. All institutions regulated by HEFCW will have their full-time undergraduate and PGCE (QTS) courses automatically designated for student support. These courses are known as qualifying courses.

The following information sets out the processes for an institution submitting a fee and access plan for the first time and the approval process by HEFCW. Institutions currently regulated have been contacted separately, setting out our expectations of them.

If you require this document in an alternative accessible format, please email [info@hefcw.ac.uk](mailto:info@hefcw.ac.uk).



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## Annexes

The fee and access plan application form is provided in two annexes:

Annex A - Application Form with regulatory information and fee and access plan (a Word template)

Annex B - Fee income, locations, financial information, fee investment, and fee and access plan target information (an Excel template)

## Introduction

1. HEFCW is publishing this guidance to support institutions applying for a fee and access plan. Welsh Government's aim is for fee and access plans to make a significant and lasting contribution to widening access to higher education in Wales.
2. Approved fee and access plans are the means by which institutions become regulated by HEFCW. All institutions regulated by HEFCW will have their full-time undergraduate and PGCE (QTS) courses automatically designated for student support. These courses are known as qualifying courses.
3. Fee and access plan applications should be submitted to HEFCW by completing the application form attached at **Annex A** along with the supporting information requested in **Annex B**. Given the ongoing impact of the Covid-19 pandemic, we will discuss our expectations for currently regulated institutions with them directly.
4. Fee and access plan applications can only be made by institutions in Wales that provide higher education and are charities. Institutions must provide sufficient information to evidence that they meet these criteria, as well as submitting information on the quality of their education, financial viability and the management of financial affairs.
5. Governing bodies of institutions applying for fee and access plans are responsible for the applications submitted to HEFCW and, if approved by HEFCW, for complying with the requirements of the regulatory system in Wales, as set out in **Appendix 1**.
6. Approved fee and access plans must either specify the full-time undergraduate and PGCE (QTS) fees that regulated institutions will charge or provide for the determination of a fee. Fees cannot exceed the maximum fee limits set out by Welsh Government.<sup>1</sup>
7. Only regulated institutions will be able to add full-time undergraduate courses to the Student Loans Company's (SLC) Course Management System (CMS). Where higher education is provided on behalf of a regulated institution, the regulated institution is responsible for including these courses on the SLC's CMS.
8. This guidance sets out the information an institution must include when submitting a fee and access plan application and the application process.
9. Revisions to this latest version of the guidance are minimal and a summary of changes from the [version published in February 2020](#) are set out in **Appendix 2**.

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<sup>1</sup> [The Higher Education \(Amounts\) \(Wales\) Regulations 2015](#)

10. There are currently plans to create a new Tertiary Education and Research Commission by 1 April 2023. This will result in the dissolution of HEFCW with the new Commission having regulatory oversight of higher education in Wales. How these amendments to the oversight of higher education will impact on 2022/23 fee and access plans will be shared with institutions at the appropriate time.

#### Legislation and policy documents

11. This guidance is informed by:
- the [Higher Education \(Wales\) Act 2015](#) (the 2015 Act), explanatory notes, and associated Regulations<sup>2</sup>
  - [Welsh Government Guidance on the preparation for delivery of the new regulatory system](#)
  - [Welsh Government guidance on the preparation for full implementation of the new regulatory system for higher education in Wales](#) and
  - [Welsh Government guidance to HEFCW on fee and access plans](#).
12. HEFCW's fee and access plan guidance has been developed taking account of:
- the [Equality Act \(2010\)](#)
  - the [Equality Act \(2010\) \(Statutory Duties\) \(Wales\) Regulations \(2011\)](#)
  - the [Environment Act \(2016\)](#)
  - the [Welsh Language Standards Regulations \(2017\)](#)
  - the [Well-being of Future Generations \(Wales\) Act \(2015\)](#)
  - HEFCW's new Corporate Strategy (to be published following Ministerial approval, and
  - [HEFCW's Well-being Statement](#) (2018)<sup>3</sup>.
13. Higher education providers applying for a fee and access plan should take account of the following HEFCW publications when completing their application:
- [Corporate Strategy](#)
  - [Remit letters](#) to HEFCW from the Welsh Government
  - [Strategic Equality Plan](#)
  - [HEFCW national measures](#)
  - [Statement of Intervention](#)
  - [Quality Assessment Framework for Wales](#)
  - [Well-being and Health in Higher Education Policy Statement](#)

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<sup>2</sup> [The Higher Education \(Qualifying Courses Qualifying Persons and Supplementary Provision \(Wales\) \(Amendment\) Regulations 2016](#); [The Higher Education \(Fee and Access Plans\) \(Wales\) Regulations 2015](#); [The Higher Education \(Amounts\) \(Wales\) Regulations 2015](#); [The Higher Education \(Designation of Providers of Higher Education\) \(Wales\) Regulations 2015](#); [The Higher Education \(Fee and Access Plans\) \(Notices and Directions\) \(Wales\) Regulations 2015](#); [The Higher Education \(Fee and Access Plans\) \(Notices, Procedure and Publication\) \(Wales\) Regulations 2016](#).

<sup>3</sup> This will be amended once HEFCW's new Corporate Strategy gains Ministerial approval

- [Welsh Language Standards: Implementation Plan](#)
- [Financial Management Code](#)
- [Advance HE review of fee and access plan evaluation frameworks](#)
- [Reaching Wider Programme Guidance](#)<sup>4</sup>
- [Guidance on Partnership Arrangements for Franchise Education Provided on Behalf of Regulated Institutions in Wales](#) (referred to in this guidance as Guidance on Partnership Arrangements).

### Timetable

14. We will signal our expectations for dates of submissions to current regulated institutions directly. All institutions considering applying for a fee and access plan for the first time should contact HEFCW before submitting an application. The process for this is set out on our website, [Notification of intention to submit a fee and access plan](#).

### Prevent

15. Institutions that have a fee and access plan approved by HEFCW will be classified as a relevant higher education body and will immediately need to comply with the Prevent Duty legislation, if they do not already. Institutions **that are headquartered in Wales come under HEFCW's monitoring authority unless they are already inspected by Estyn.**<sup>5</sup> HEFCW's Monitoring Framework circular [W16/39HE](#) sets out how HEFCW monitors providers' implementation of the statutory Prevent Duty. Relevant higher education bodies need to follow this framework to demonstrate due regard to the duty. For more information please contact [prevent@hefcw.ac.uk](mailto:prevent@hefcw.ac.uk).

### Designation of other courses

16. This guidance relates only to full-time undergraduate and PGCE (QTS) student support. All Welsh-funded<sup>6</sup> institutions are automatically designated for student support of part-time undergraduate, full-time and part-time postgraduate, and doctoral courses.
17. Higher education providers that either cannot, or choose not to, apply for a fee and access plan can apply for their full-time undergraduate and PGCE (QTS) courses to be specifically designated for Welsh domiciled students on a 'course-by-course' basis. Additionally, providers that are not publicly funded and wish for their part-time or postgraduate courses to be designated for Welsh domiciled students can apply for them to be specifically designated on a 'course-by-course' basis. For further

<sup>4</sup> The new Reaching Wider Strategy period will begin in 2022/23. Fee and access planning will continue to align with the previous programme. Future fee and access plans should align with the new Reaching Wider Strategy.

<sup>5</sup> Providers that are not headquartered in Wales will be monitored by the relevant authority in that country.

<sup>6</sup> A Welsh institution means an institution in the United Kingdom maintained or assisted by recurrent grants out of funds provided by Welsh Ministers.

information on the specific designation process contact [regulationadvice@hefcw.ac.uk](mailto:regulationadvice@hefcw.ac.uk). Institutions should discuss course designation arrangements for students domiciled in other parts of the UK with the relevant UK administrations.

## **Equality and diversity and HEFCW's impact assessment**

18. We have a duty to impact assess our policies and processes. This guidance has been impact assessed. As a public authority, HEFCW has responsibilities under the Equality Act 2010 and [Public Sector Equality Duty \(2011\)](#) to give due regard to equality and diversity when developing and implementing its policies. In addition, HEFCW has duties under the Well-being of Future Generations (Wales) Act (2015) (Future Generations Act) and duties in relation to the Welsh language.<sup>7</sup> HEFCW is not a regulator of institutions' compliance with legal obligations under the Equality Act 2010, however we monitor performance. The Welsh Government guidance to HEFCW on fee and access plans (paragraph 4.18) states that groups under-represented in higher education may include individuals with protected characteristics,<sup>8</sup> as defined by the Equality Act.
19. We included specific equality and diversity-related questions in our [consultation on the 2017/18 fee and access plan guidance](#), on which this guidance is based. HEFCW encouraged consultation responses to identify any potentially negative impacts on equality and diversity, the Welsh language and the well-being goals, as set out in the Future Generations Act. HEFCW annually monitors data and evidence on individuals with protected characteristics and the Welsh language to inform its policy implementation and practice. HEFCW continues to welcome additional evidence and/or advice to inform its fee and access plan policy development and implementation. Please email any additional evidence and/or advice to [equality@hefcw.ac.uk](mailto:equality@hefcw.ac.uk).
20. We published our [Strategic Equality Plan 2020-2024 \(SEP\)](#) in March 2020, following consultation. Our SEP sets out our priorities for HEFCW and higher education in Wales and how we will collaborate with providers and other partners to achieve them. Institutions should consider these priorities and those priorities set out in their own SEPs when setting their objectives to support under-represented groups in higher education. HEFCW intends to review its SEP to take account the impact of Covid-19 in line with advice from the Equality and Human Rights Commission. We recognise that all regulated institutions will be doing so as well.
21. From 31 March 2021, named public bodies in Wales must pay due regard to the socio-economic duty, as set out in the Equality Act 2010. While HEFCW, nor higher education providers, are currently named public

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<sup>7</sup> Welsh language standards regulations, which apply to HEFCW, were published in early 2017.

<sup>8</sup> Protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnerships, race, religion and belief and non-belief, sex and sexual orientation.

bodies, HEFCW has committed to 'act within the spirit of' the duty, as expected by Welsh Government and we strongly encourage regulated institutions to do the same.

22. HEFCW is committed to providing a high and equal standard of service to the public in both Welsh and English to meet the [Welsh language standards](#). Our [implementation plan](#) sets out how we comply with these standards. Further information is available on our [website](#).
23. HEFCW is not the regulator of institutions' compliance with the Welsh Language Standards. However, we support the development of Welsh medium higher education and expect higher education providers to increase applications to, and enrolments on, Welsh medium courses. Opportunities to study in Welsh are a distinctive and important part of higher education in Wales and in developing fee and access plans, institutions should take account of Welsh medium provision. Our impact assessment process take into account our duties in this regard.
24. HEFCW has submitted its new Corporate Strategy to Welsh Government and is waiting Ministerial approval. We will revise our well-being objectives as required by the Well-being of Future Generations Act (2015). The fee and access planning processes is a key mechanism in the delivery of our Corporate Strategy and evidencing our commitment to the Future Generations goals.

#### **Further information and advice**

25. Any institution wishing to discuss the process for applying for a Fee and Access Plan, or any other aspect of our regulatory functions, should email queries to: [regulationadvice@hefcw.ac.uk](mailto:regulationadvice@hefcw.ac.uk).

## Fee and access plan Application Form

26. The institution applying for a fee and access plan must complete the application form attached at **Annex A** and provide supplementary information in an excel spreadsheet attached at **Annex B**. The application form is split into three parts and each part is split into different sections.
27. This guidance goes through each section of the application form and sets out our expectations for the institution completing the application form.
28. All fee and access plan applications must include the name of the institution and the institution's UK provider registration number.
29. In submitting a fee and access plan application the governing body must name the contacts within the institution that are responsible to the governing body for managing that application. The application form provides for two contacts within the institution. We expect the governing body to nominate a member of its senior management team, such as a Deputy or Pro-Vice Chancellor, to be the lead institutional contact. All correspondence related to the application will be sent to this contact. An additional institutional contact should also be named to ensure that correspondence relating to applications are received and processed in a timely manner. We would expect this to be a senior member of the planning team.

### Part One: Regulatory Information

30. The institution applying for a fee and access plan is required to submit information to demonstrate that it is eligible to apply for a fee and access plan.
31. We require evidence that demonstrates that the institution:
  - is an institution,
  - is located principally or wholly in Wales,
  - provides higher education,
  - is a charity,
  - is financially viable,
  - is financially well managed, and
  - provides quality education.
32. Where HEFCW holds sufficient, up to date information, we will use it, subject to the governing body's permission to do so. The institution can also submit new, additional or more recent information to inform our assessment processes. Where HEFCW does not have sufficient, up-to-date information or data, the institution is required to provide this in

support of its applications. All data submitted as evidence should be the most current, verifiable data.

33. HEFCW reserves the right to visit the institution to better understand eligibility related to the organisation and management of financial affairs and the quality of education provided by, or on behalf of, the institution where information is unclear or insufficient.
34. Information submitted to HEFCW in part one is for our information only and we do not require the institution to publish it.

### **Section 1: Is the fee and access plan applicant an institution?**

35. The 2015 Act does not specifically define the term 'institution'. HEFCW regards the following as institutions:
  - universities formed by Royal Charter,
  - Higher Education Corporations,
  - Further Education Corporations and
  - bodies that train members of the education workforce.
36. The fee and access plan applicant must confirm that it is either one of these types of institution. If the institution is one of these types of institutions it should link to the documentation that evidences this or submit this information if it is not publicly available.
37. If the fee and access plan applicant is not of a type listed in paragraph 34 it must apply to Welsh Government to be [designated as an institution for purposes of the Act](#) prior to submitting a fee and access plan.
38. If the fee and access plan applicant is refused designation as an institution for purposes of the Act, we will not be able to approve the institution's fee and access plan application.

### **Section 2: Is the institution located wholly or principally in Wales?**

39. We will consider the institution as being in Wales by taking account of a range of evidence as set out in the guidance.
40. The institution must list both its principal and legal addresses, where they are different, and any other names under which the institution operates.
41. In addition to this information we require the institution to list the locations of all learning and teaching and non-learning and teaching activities where the institution has an interest, including locations in Wales, the rest of the UK and overseas. For each location where the institution delivers learning and teaching activities the institution must include the number of students on courses at each location. The institution should provide this information in the 'Locations' Table of **Annex B**.<sup>9</sup>

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<sup>9</sup> Guidance on completing Annex B can be found in paragraphs 161 to 218.

### Section 3: Does the institution provide higher education (HE)?

42. The institution must be able to demonstrate that it provides higher education, as listed in [Schedule 6 to the Education Reform Act 1988](#), regardless of mode of study.
43. Should the institution not subscribe to the Higher Education Statistics Agency (HESA) it must provide a description of the higher education it provides and separately the full-time equivalent numbers of students in Wales that may be taking the higher education courses at the date of application and for three years previously. Should the institution subscribe to HESA then it does not need to provide this information and should leave the application form requesting this information blank. Where the institution had previously returned student information through the lifelong learning Wales record (LLWR) we may use historical information from that record.
44. The institution must have control of its qualifying courses ie its full-time undergraduate and PGCE (QTS) courses. Factors in assessing control include whether the institution has responsibility for the overall content and delivery of the qualifying course(s), quality assessment arrangements and contractual responsibilities to the student. HEFCW will take account of how both parties define this, but it is ultimately for HEFCW to determine whether the provision is provided by, or on behalf of, the institution.
45. The institution is deemed to be in control of the course if it is:
  - the awarding body and it either delivers the qualifying courses itself or the qualifying courses are delivered on its behalf under sub-contractual arrangements,
  - delivering the qualifying courses under a validation arrangement with a university, or
  - delivering the qualifying courses awarded by either Pearson or the Scottish Qualification Authority.
46. The institution will be deemed not to be in control of the course if it provides that course on behalf of another organisation, under a sub-contractual agreement such as a franchise agreement.
47. There will be situations where the institution provides higher education directly and separately provides higher education on behalf of another institution. In these situations, only the courses it provides directly should be included in a fee and access plan, not the courses it provides under sub-contractual arrangements (which are the responsibility of the awarding organisation and come under its regulatory responsibility).
48. The institution may have full-time undergraduate courses provided on its behalf. These courses come within scope of the institution's fee and access plan and are designated for student support when the partner

body, delivering the course, is a separate legal entity and a charity. In this case the partner will not have responsibility for the overall content and delivery of the qualifying course.

49. If the institution applying for a fee and access plan wants higher education courses delivered at its subsidiaries to come within the scope of its fee and access plan, it will need to confirm that agreements are in place for subsidiaries to deliver education on its behalf. These agreements should be between the governing body of the parent organisation and the subsidiary.
50. If the institution applying for a fee and access plan is a subsidiary of a parent organisation and a separate legal entity to that parent organisation it will need to evidence that it is in control of the courses by submitting to HEFCW agreements with the relevant awarding organisation. The institution will be assessed as an institution and must meet all regulatory requirements in its own right.
51. In order to assess whether the institution is in control of the course we require the institution to either:
  - confirm that the qualifying courses in scope of the fee and access plan lead to qualification that the institution awards itself; or
  - name the organisation that awards the qualifications for the courses it is delivering, along with the relevant documentation from the awarding organisation to prove that.
52. Qualifying courses must be validated by an appropriate awarding body:
  - a university that is on the [Welsh Minister's recognised bodies order](#),
  - Pearson, and
  - the Scottish Qualification Agency.

#### **Section 4: Is the institution a charity?**

53. The institution applying for a fee and access plan must be a charity and this must be confirmed in the application along with the institution's charity registration number (where relevant) and the name and address of its charity regulator.
54. All Chartered Universities in Wales and all Higher Education Corporations in Wales are registered charities. All Further Education Corporations are exempt charities.
55. If the institution is not registered with a charity regulator, it must provide reasons for this, together with a copy of its governing document.
56. Where qualifying courses, within scope of the fee and access plan, are being delivered on behalf of the institution then the institution must

confirm that each provider delivering the qualifying courses on its behalf is a charity. This will be captured in the 'Locations' table of **Annex B**<sup>10</sup>.

### **Section 5: Is the institution financially viable?**

57. The institution must provide information to HEFCW about its financial viability, including evidence that it is sustainable over the medium-term. The evidence should be sufficient to give HEFCW reasonable confidence that students will not be at risk of being unable to complete its course as a result of financial failure.
58. Our assessment of the institution's financial performance and sustainability will be an overall judgement that also takes into account the context of the institution's financial position and its strategic plan.
59. The institution should provide full details in its application of its corporate group structure, including details of all group companies or organisations, including subsidiaries, parent/holding companies and associate or joint ventures.
60. As appropriate, the assessment of financial viability may take into account the financial arrangements of any group structure (including subsidiaries, parent/holding companies, or associate and/or joint ventures) where it is considered relevant to financial viability.
61. A financial strategy that reflects the overall strategic plan must be made available at the point of submitting a fee and access plan, setting out appropriate benchmarks and performance indicators, showing how resources are to be used, and how activities and infrastructure will be financed. This should include how the institution assesses and reviews its sustainability, including the use of sustainability assessments
62. The remaining information required depends on HEFCW's relationship with the institution applying for a fee and access plan.

#### If the institution is a university currently regulated by HEFCW

63. The institution must provide updated forecast information set out in the 'Financial Information' Table of Annex B. This will supplement information submitted by the institution as part of the [HEFCW Requests for Forecasts 2019 circular](#). Any supporting narrative should be provided in the application form and the titles of any supporting documents should be referenced in the application.

#### If the institution is not a university currently regulated by HEFCW

64. The institution must provide information, which illustrates:

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<sup>10</sup> Guidance on completing Annex B can be found in paragraphs 161 to 218

- **Historical performance** - a track record of financial performance evidenced by annual reports and externally-audited financial statements for the three years prior to the application. The accounts must be audited each year by a registered auditor. This must not be the same firm and/or individual that prepared the accounts, to ensure that HEFCW can have full confidence in the audit. The basis of the accounts will be Generally Accepted Accounting Practice in the UK (UK GAAP) (or successor requirements) or International Financial Reporting Standards (IFRS), if appropriate.
- **Forecasts – the institution must provide forecasts that cover the estimated current year together with at least three year forecasts, with the support of a parent company guarantee if necessary, that demonstrate they have:**
  - adequate cash flow to remain solvent, that is, sufficient liquidity to pay debts as they fall due, and
  - an adequate balance sheet that maintains a net total assets position such that they would not incur deficits if these would result in a net total liabilities position. Full financial forecasts should cover the current year (2019/20) and the following three years. The evidence should include a commentary on the assumptions being made and how any financial risks are being managed.

65. Where the institution is a college then it can submit the forecast information it provides to Welsh Government.

#### **Section 6: Are the institution's financial affairs well-managed?**

66. The institution will need to provide evidence that it is well-managed with sound management practice in place and the capacity to develop in line with its strategic plan and the financial strategy that supports its fee and access plan. Where the institution has already submitted this evidence to HEFCW please refer where relevant in the application form, in relation to the name of the file provided.
67. The institution must provide information to illustrate that it:
- has financial management processes that are well-governed and controlled adequately and effectively,
  - plans and manages activities to remain viable,
  - has robust and comprehensive systems of risk management and internal control,
  - has effective arrangements for the management and quality assurance of data used for internal decision making,
  - has regular, reliable, timely and adequate information to monitor operational and financial performance,
  - reports information regularly, comprehensively and correctly to appropriate senior management and those charged with governance,
  - manages its estate in a sustainable way in line with an estates strategy,

- is able to meet all the necessary data capture and reporting requirements for HEFCW including those administered by HESA and other bodies as required by HEFCW. Examples include:
    - the report of the latest internal audit of data systems and processes
    - the annual HESES survey
    - student, student destination, staff, estates, finance and business and community interaction data provided to HESA and
    - the annual assurance return.
68. In assessing the data management capabilities consideration will be given, where applicable, to the institution's track record in submitting data to HEFCW or other bodies including HESA, the Welsh Government and the Student Loans Company and its compliance with the code of practice for [higher education data collections](#) in preparing data for submission.
69. The institution must provide evidence that it can comply with the principles of the Higher Education Code of Governance<sup>11</sup> unless adherence to alternative, equally robust governance principles such as Colleges Wales' Code of Good Governance for Colleges in Wales<sup>12</sup>, can be evidenced. HEFCW recognises that the Code is voluntary and the institution may be able to apply alternative governance practices to achieve similar outcomes. However, HEFCW considers that the principles and intended outcomes (referred to as 'the Elements') of the Code are sound. Where it is not possible to evidence compliance with the Code, HEFCW will require an explanation that describes equally robust alternative arrangements that are in place or demonstrates that there are appropriate and reasonable grounds for non-adherence.
70. If the institution does not already comply with the Higher Education Code of Governance, it should discuss with HEFCW, before applying for a fee and access plan, how it might provide evidence of equally robust alternative arrangements.
71. The institution will need to take account of all relevant guidance on the responsibilities of trustees and effective trusteeship. This [guidance](#) is available on the [Charity Commission website](#).
72. The institution must provide evidence that it:
  - complies with the statutory requirements relating to external audit, and
  - is owned, managed and run by 'fit and proper persons' by providing:
    - evidence of its organisation's identity and that of key individuals (for example, the Governing Body, Vice Chancellor, Principal, directors, shareholders, trustees), along with their skills and experience, and

<sup>11</sup> [Higher Education Code of Governance \(Committee of University Chairs\) December 2018](#)

<sup>12</sup> Code of Good Governance for Colleges in Wales (Colleges Wales) 2016

- confirmation that directors / trustees (as relevant) are eligible to act as either directors or trustees and have not been disqualified from acting as directors or trustees.

### **Section 7: Is the education provided by and on behalf of the institution adequate to meet the needs of students?**

73. We are responsible for assessing or making arrangements for the assessment of the quality of all education provided, both by and on behalf of regulated institutions. Education provided outside Wales is considered to be provided in Wales if it is provided as part of a course that is provided principally in Wales. The institution applying for a fee and access plan will need to evidence that the quality of all the education it provides (not just the quality of its qualifying higher education courses) is adequate to meet the reasonable needs of those receiving the education or undertaking the course.
74. Currently, the reasonable needs for the quality of higher education are considered to be met if the institution has obtained satisfactory judgements in an external quality assurance review which meets standards set out by HEFCW.<sup>13</sup> These judgements ensure quality assessment is rigorous. In every case, the institution obtaining judgements of less than 'meets' or equivalent, will be deemed to have, or to be at risk of having, inadequate quality. The reasonable needs for non-higher education provision are considered to be met if the institution has a successful review/inspection by the appropriate body responsible for the quality standards of that provision (e.g. [Estyn](#), [Pearson](#), etc). External review evidence will also need to be supplemented by additional information that provides ongoing assurances that the quality of education remains adequate.
75. For fee and access plan applications, the institution must provide *all* of the following:
- Confirmation that it has internal quality assessment procedures in place for all of its education provision – whether such provision is by institutions or on its behalf. This includes all higher education provision (including qualifying courses and non-qualifying courses such as part-time study and apprenticeships), and non-higher education provision, e.g. school, further or professional education. It covers education provided by the institution or on its behalf via other providers under sub-contractual agreements.
  - Confirmation and evidence that all of its higher education provision, including higher education provided on its behalf (eg franchise provision), has obtained satisfactory judgements in a relevant external quality assurance review. If the institution is looking to become regulated for the first time, it must demonstrate that it has successfully undergone two reviews by the Quality Assurance

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<sup>13</sup> See information provided on HEFCW's [quality assessment framework webpages](#)

Agency for Higher Education (QAA) at four yearly intervals, with the most recent being a [Gateway Quality Review – Wales](#). If the institution is currently regulated, it must demonstrate that it has successfully undergone a *Higher Education Review: Wales*, [Quality Enhancement Review](#) or equivalent external quality assessment review process within the past six years. In the year immediately following a review, if existing regulated institutions are in the process of working through a review outcome to address issues resulting from a less than fully satisfactory outcome, we expect them to set out in detail how they are addressing those outcomes. We would expect these actions to be completed within 12 months. We also expect any other reviews or inspections that the institution is required to undertake for other higher education provision such as apprenticeships to be evidenced.

- Confirmation and evidence that all of its non-higher education provision, and any non-higher education provided on its behalf, has successfully undergone a review/inspection by the appropriate body responsible for the quality standards of that provision. In the year immediately following a review/inspection, if existing regulated institutions are in the process of working through a review/inspection outcome to address issues resulting from a less than fully satisfactory outcome, we expect them to set out in detail how they are addressing or planning to address those outcomes. We would expect these actions to be completed within 12 months.
- Confirmation that the governing body has been able to sign off the quality assurance statements requested annually:
  - 1 The governing body has received a report taking account of the external quality assurance review, and an action plan has been put in place and implemented as appropriate, in partnership with the student body.
  - 2 The methodologies used as a basis to improve the student academic experience and student outcomes are, to the best of our knowledge, robust and appropriate.
  - 3 A) For providers with degree awarding powers: The standards of awards for which we are responsible have been appropriately set and maintained.  
B) For providers without degree awarding powers: The standards of awards for which we are responsible have been appropriately maintained.
  - 4 The governing body has considered a report on the annual dialogue between the institution and the student union or equivalent, scrutinised student survey outcomes and confirmed that action plans had been put in place and implemented, in partnership with the student body.
  - 5 The governing body has received a copy of the relationship agreement between the institution and the student union or

equivalent, and a copy of the student charter, both of which have been reviewed within the past year.

- Confirmation that there are appropriate partnership arrangements in place with all other bodies that either deliver education on its behalf or (where relevant) deliver qualifications that lead to one of its awards. The institution will have list all bodies that either deliver education on its behalf or (where relevant) deliver qualifications that lead to one of its awards in the 'Locations' Table of Annex B, confirming that an agreement is in place for each partnership. We expect all agreements to have been signed after 1 September 2015 (or have an addendum added after 1 September 2015) to confirm the arrangements fall under the 2015 Act.<sup>14</sup> HEFCW may request evidence of the partnership agreements.

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<sup>14</sup> As noted above in the section relating to criteria on being an institution in Wales providing higher education, HEFCW reserves the right to require copies of the relevant agreements. HEFCW will keep requirements regarding quality under review, and so may update these in future years.

## Part Two: Fee and access plans

76. This section provides guidance to the institution completing the fee and access plan form attached at **Annex A**.
77. The fee and access plan sets out the institution's commitment to widening access to, through and beyond HE through supporting equality of opportunity and promoting higher education in Wales.
78. The HE Act sets out the general requirements of a fee and access plan. The general requirements are to:
- take, or to secure the taking of, measures to attract applications from prospective students who are members of under-represented groups,
  - take, or to secure the taking of, measures to retain students who are members of under-represented groups,
  - provide, or to secure the provision of, financial assistance to students,
  - 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,
  - 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,
  - monitor compliance with the provisions of the plan, and
  - monitor progress in achieving the objectives set out in the plan.

We have set out in the application form where in the plan we expect the general requirements to be evidenced.

79. Fee and access plans must be published and must be made accessible to students in any format should this be requested.
80. The application form must clearly indicate the name of the institution applying for the fee and access plan.
81. The institution can apply its own branding to the template from the outset but must not change the application form in any way once it has been approved by us.

### Duration of the fee and access plan

82. A fee and access plan will be considered to be 'in force' from the date it is approved and it has 'effect' from the academic year to which the fee and access plan relates. For example, a 2022/23 plan will be in force from the date of HEFCW's approval, July 2021, and in effect in the academic year 2022/23.

83. Fee and access plans must specify the period when they will be in effect. We work to an academic and planning year for many purposes, including fee and access planning, which is 1 August until 31 July. Aligning fee and access planning with our annual planning cycle enables institutions to be agile in responding to Welsh Government and HEFCW policies and students' needs and to publish fee levels at around the same time as other UK higher education institutions.

## Contents page

84. We expect all fee and access plans to include a contents page to assist readers to navigate the plan.

## Executive summary

85. The executive summary should set out the main features of the plan and highlight key priorities and anticipated investment. Executive summaries should a clear and succinct overview of the plan. We expect executive summaries to include:
- the purpose and strategic objectives of the plan,
  - the groups identified as under-represented in higher education, and
  - the fee income being invested to deliver the objectives as a percentage of the total full-time undergraduate and PGCE (QTS) fee income for students under the current fee regime.
86. Executive summaries should be accessible as they may be read by a range of interested parties, such as students. Executive summaries and the plans must explain any acronyms used and best practice would be to avoid abbreviations unless strictly necessary.
87. The executive summary should be no more than **1,000 words**.

## Section 1 - Fee levels

### Section 1.1 – Fee levels or the determination of a fee level at each location

88. Fee and access plans must either:
- specify each fee level that the institution will charge or
  - provide for the determination of a fee level.

Guidance for these two methods of presenting fees are set out below.

#### Specifying fee levels

89. Where the institution specifies full-time undergraduate and PGCE (QTS) fee levels in a plan they should be clearly set out in the table provided. For each fee level, the institution should separately list each location where that fee will be charged and the qualification that the student being charged that fee in 2022/23 is studying towards. The qualifications that must be listed should be:
- first degree,

- integrated masters' degree,
  - a PGCE leading to QTS,
  - a PGCE not leading to QTS,
  - Foundation Degree,
  - HND,
  - HNC,
  - diploma of higher education, or
  - certificate of higher education.
90. Where a fee level is not agreed for a particular type of qualification at a location, the institution will not be able to charge that level of fee. For example, should an approved plan include fee levels charged at £7,500 for HNCs and HNDs at a location of another partner which is a charity providing a qualifying course on its behalf, the institution will not be able to charge a fee for any other qualification, such as a foundation degree, at that location, unless it first varies its plan, through HEFCW's variation process.
91. The institution must consider as separate locations each:
- of its own campuses; and
  - campuses of the charities providing full-time undergraduate courses on the institution's behalf.
92. When listing fee levels the institution cannot exceed the maximum fee limits in regulations. These are currently:
- £4,500 for the final academic years of courses where that academic year is normally required to be completed after less than 15 weeks attendance and a course of initial training of teachers including an academic year during which any periods of full time study are in aggregate less than 10 weeks,
  - £1,800 for sandwich courses,
  - £1,350 for study and work placements overseas, and
  - £9,000 for all other courses.
93. Where the institution commits to specifying fee levels in plans, the institution must take into account the potential impact of changes to the maximum fee, following fee and access plan approvals. Any changes to maximum fee limits will require a variation to a fee and access plan. When considering variations to fee and access plans, we will have regard for the fundamental principle that must students know, before committing to a course, the aggregate amount of fees that the institution will charge for the duration of the course.
94. When completing the application form, the institution can delete the box provided for determining fee levels if it is specifying fee levels.

#### Determining a fee level

95. Where an institution determines a fee level, the institution must provide a clear explanation of how the fee will be calculated. The institution could

make reference and link to the maximum fee amount as prescribed in 2015 Act regulations, for example, and state when the actual fee levels will be set and where this information will be found on its website, as well as confirming that the fee will not exceed the maximum amount permitted. The institution must ensure that when it sets a fee level, it is set in a way that is consistent with how the fee level has been determined in an approved fee and access plan.

96. When completing the application form, the table for specifying fee levels can be deleted, if it is determining a fee level.
97. Where the institution determines how a fee will be calculated, it will need to provide more information of how it will determine a fee do this in part 3 of the application form. This information will be used only by HEFCW to understand investment to improve equality of opportunity and the promotion of higher education. Further information is included below in the section on fee income investment.

## **Section 1.2 – Aggregate Fee Levels**

98. It is a general requirement of the HE Act that all regulated institutions must either:
  - provide clear information to potential and current students about their aggregate fees for the completion of the course and the basis for any potential fee increases for the duration of their course, or
  - confirm that there will be no fee increases for the duration of their course.
99. This section of the fee and access plan application form must also set out how the institution will communicate fee information to its students and link to where the information can be found on its website.
100. This section must relate to all fee levels being charged, not just those charged at the maximum fee rate.
101. It is good practice for institutions to publically commit to abiding by the [Competition and Markets Authority \(CMA\) guidelines for higher education](#).
102. In approving the fee and access plan application for submission to HEFCW, the institution's governing body is confirming its processes for determining or specifying fee levels comply with these guidelines.

## **Section 2 – Student Partnership**

103. The student voice should be evident throughout the plan. The institution should explain in the application form how the institution involves students as partners in decision-making and strategic planning. This will demonstrate the institution's commitment to aligning with its Student

Charter, student partnership, and provision of information to prospective students in line with CMA guidance.

104. The institution must clearly explain how the institution has identified the priorities of its diverse student populations (including those studying courses provided on its behalf by another charity) and explain how these students' views inform the institution's objectives, the activities and services to be delivered through the plan and the under-represented groups it is supporting.
105. We want to understand how the institution provides feedback to its students on how it has taken account of their priorities. Examples of services and activities set out in the plan that are delivered in collaboration with students would be helpful.
106. Information regarding how the plan was informed by surveys of prospective students, or as a result of Reaching Wider Partnerships' involvement, may strengthen the plan and evidence how the student voice was taken into account.

### Section 3 – Identifying under-represented groups

107. The institution must set out clearly the groups under-represented in higher education that it will support with fee and access plan investment to improve equality of opportunity in Wales. **Only groups identified as under-represented in HE should be supported by equality of opportunity investment.**
108. The following groups are considered by HEFCW to be under-represented in higher education. We identify some of these in our national measures, the Reaching Wider Programme and in our Strategic Equality Plan. We expect the institution to support all under-represented groups listed in HEFCW's national measures. These are listed as follows:
  - Students of all ages from the bottom two quintiles of the Welsh Index of Multiple Deprivation 2014.
  - Students of all ages from the bottom quintile of the Welsh Index of Multiple Deprivation 2014.
  - Students of all ages that would benefit from studying part-time Higher Education.
  - Students of all ages studying through the medium of Welsh.
  - People of all ages from UK low participation in HE areas.
109. In supporting these under-represented groups we expect Fee and Access Plans to be clear about how the range of modes and levels of study being offered including full-time, part-time, flexible working etc.
110. We expect the institution to use the fee and access plan to fund its institutional contribution to the Reaching Wider Programme at the same rate as in previous years. The institutional Reaching-Wider priority groups continue to be:

- post-16 young people within the bottom two quintiles of the Welsh Index of Multiple Deprivation,
- adults without level 4 qualifications within the bottom two quintiles of the Welsh Index of Multiple Deprivation, and
- care experienced applicants<sup>15</sup> and carers in all age groups across Wales.

**Only these groups should be supported through the institutional contribution to the Reaching Wider Programme and listed separately in this section. We expect the institutions to clearly set out the Reaching Wider WIMD institutional groups identified and supported separately from wider WIMD groups, that is those post 16 learners and adults without level 4 qualifications.**

111. The institution can also prioritise fee and access plan investment to support some of the under-represented groups listed below. Inclusion of any of these groups must be supported by evidence that they are under-represented in the institution, in Wales or in UK HE. We do not expect the institution to support all of these under-represented groups through its fee and access plan investment.
- Students with protected characteristics.
  - Students from some ethnic minority groups.
  - Young males from WIMD and low participation areas (POLAR 4).
  - People living in workless households.
  - People experiencing 'in work poverty'.
  - Refugees and asylum seekers.
  - Learners who were in receipt of an Educational Maintenance Allowance (EMA).
  - Learners who were eligible for free school meals.
  - Applicants and students who are the first in family to enter higher education.
  - Service and ex-service personnel and their families.
  - Ex-offenders.
112. An institution may include other groups it has identified as being under-represented in higher education. Where this is the case they should be listed separately in this section.
113. The institution should also take into consideration issues of race equality in higher education, building on the Advance HE enhancement programme: Race: access and success in Higher Education. We also expect institutions to respond to Welsh Government's remit that "achieving a Charter Mark as a demonstration of their commitment to eradicating racism and racial inequality at all levels within the sector".

#### **Section 4 – Objectives, underpinning activities, under-represented groups and targets as they relate to supporting equality of opportunity and the promotion of HE**

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<sup>15</sup> Looked after children and care leavers

114. The institution must set out its fee and access plan objectives to improve equality of opportunity and promote higher education. The institution set these out separately for equality of opportunity (in section 4.1 of the form) and the promotion of higher education (in section 4.2). Against each objective the institution must:
- set targets that it will use to measure progress towards the success of its objectives,
  - the investment to deliver its objectives, and
  - list the under-represented groups that the institution will be supporting through delivering each equality of opportunity objective.

#### Institution's objectives

115. When setting objectives the institution must be clear that objectives to improve equality of opportunity only support students and applicants from the under-represented groups it has identified. Only objectives to promote higher education can support all students.
116. The institution must take account of the general requirements of fee and access plans when setting objectives to improve equality of opportunity. Objectives should address how institutions will:
- attract applications from students who are members of under-represented groups, and
  - retain students who are members of under-represented groups.
117. We strongly encourage the institution to include objectives related to progression and increasing the proportion of students studying through the medium of Welsh. These objectives will recognise that the definition and aim of widening access in Wales is “widening access to and through higher education”<sup>16</sup> and taking into consideration Welsh Government ambitions around the Welsh language.

#### Targets

118. To measure progress towards the achievement of the institution's objectives and ambitions to improve, a fee and access plan should contain specific, measurable, achievable, realistic, time-bound (SMART) targets. Each objective must have at least one SMART and appropriate target.
119. HEFCW published its [national measures for higher education performance](#) in November 2018. We expect the institution to set at least one target per objective that aligns to the national measures, demonstrating how they are delivering for Wales.<sup>17</sup>

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<sup>16</sup> As set out in HEFCW's draft Widening Access to Higher Education Strategic Approach and Widening Access Programme of Action to be published on [HEFCW's website](#).

<sup>17</sup> HEFCW considers relevant National measures to be: Widening Access, Participation, Retention, Part-time, Diversity of the student population, National Student Survey, Welsh Medium, Student Mobility, Employment and Graduate Employment.

120. We expect the institution to include longer-term targets (three to five years ahead of the academic year to which the plan relates) and a milestone target for the year to which the fee and access plan relates. All targets must be supported by a SMART target descriptor, which demonstrates the institution's ambition. The targets must include numbers and/or percentage increases or decreases as appropriate. The corresponding number/percentage must be included as contextual information. We will be clear whether the number or percentage is the target/milestone from the way the institution has phrased the target descriptor and provided the information on the template.
121. The target, target descriptor and contextual information for both long term and milestone targets should be included in the 'Targets' Table of **Annex B**. The milestone target and target descriptor should also be included in the tables in either sections 4.1 or 4.2 of the application form depending on whether the target relates to an objective to improve equality of opportunity or to promote higher education.
122. The institution must set targets informed by the most recent data available. Milestone targets must be achievable within the period of the plan. The institution must be able to report to HEFCW on the achievement of targets by December following the academic year the fee and access plan relates. For example, a 2022/23 fee and access plan should include only targets where data can be reported to us in December 2023. This reporting date will impact on target-setting.
123. Where appropriate, plans may include collaborative targets. Collaborative targets may increase engagement with other institutions, secure economies of scale, or avoid unnecessary duplication. HEFCW encourages the alignment of investment and planning underpinned by collaborative targets, including with the Reaching Wider Programme. Where collaborative provision takes place we expect transparency in reporting and investment and the avoidance of double funding.
124. We expect the institution to set targets that demonstrate its intention to improve performance or maintain performance, where this is already strong. We will be informed of the institution's performance through evidence and data available to us and through the monitoring of previous fee and access plans.
125. In setting Welsh medium targets, HEFCW expects the institution to agree targets with the [Coleg Cymraeg Cenedlaethol](#) (the Coleg). We will liaise with the Coleg to assess the appropriateness of the targets.
126. The institution should set targets that are outcomes focused, for example targets to increase a specific group under-represented in higher education rather than output-related targets such as delivering a number of activities, events and conferences. The development of institutional strategies and other areas of core business are not suitable targets.

127. The institution's targets must be derived from auditable sources. A clear data audit trail must be maintained to confirm methodology for the calculation of the targets and progress against targets for subsequent monitoring.

#### Under-represented groups

128. The table in section 4.1 must set out only those under-represented groups that will be supported through the delivery of each of the identified objectives. This is not required for the table in section 4.2 as those objectives relate to promoting higher education which support all students.
129. Where an under-represented group is included in a target listed in the table in 4.1 the institution must include that same under-represented group, in the column of the table titled 'under-represented group'. The institution must also include the other under-represented groups being supported that are not included in the target descriptor in the same column.
130. Where there is institutional Reaching Wider investment associated with an objective listed in table 4.1 of the application form, the institutional Reaching Wider under-represented groups should be clearly set out in the under-represented group column of the table, separate from the other under-represented groups listed.
131. Where the target is a collaborative target with the Reaching Wider Partnership, the target must clearly state this and name its Reaching Wider Partnership.

#### Fee income investment

132. The institution must invest a reasonable proportion of fee income received from full-time undergraduate and PGCE (QTS) courses to achieve its fee and access plan objectives. The institution must set out the proportion of fee income being invested to deliver each of its objectives to improve equality of opportunity and to promote higher education in section 4.1 and 4.2 of the application form. The total fee income being invested in equality of opportunity and the promotion of higher education should be set out in the 'Fee Investment' table of **Annex B**.
133. **If the institution is currently regulated, we require it to invest at least the same proportion of total full-time undergraduate and PGCE (QTS) fee income previously. We require:**
- **the proportion of money invested in improving equality of opportunity,**
  - **Reaching Wider, and**
  - **student support to be maintained at the same level as previous years.**

134. Where the institution has not fully achieved previous fee and access plan commitments, is not performing to the level we expect or is not ambitious enough in its objectives, HEFCW may set an expectation of higher rates of investment in future years, within a range of 15% to 20% of total fee income. This will be communicated to the institution separately.
135. If the institution has not previously been regulated we expect it to invest between 14% and 17% of its total undergraduate full-time income. This investment must be agreed with us. This range of percentage investment has been established with all existing regulated institutions.
136. Investment should be presented against each fee and access plan objective.
137. Welsh Government expects HEFCW to be robust in expecting more from regulated institutions whose record suggests insufficient progress towards improving equality of opportunity.

Activities and services to support equality of opportunity and the promotion of higher education

138. The institution must list the activities and services it will deliver in 2021/22 to achieve each of its objectives to improve equality of opportunity (in section 4.1.1 of the application form) and to promote higher education (in section 4.2.1). When assessing the activities and services being delivered we will need to understand clearly how the activities and services will contribute directly to achieving the objectives.
139. **Where an activity or service is being delivered to support an objective to improve equality of opportunity, the activities and services and their related investment must relate only to the under-represented groups the institution has identified. If activities and services are provided for all students, plans must clearly evidence to HEFCW how under-represented students are particularly supported and benefit from this activity. Equality of Opportunity investment should only relate to the proportion of activities and services likely to be accessed by under-represented groups.** Where this is not the case, relevant activities should be included in the promotion of higher education section (section 4.2.1 of the application form).
140. The promotion of higher education section allows the institution to list activities and services that relate to all students. Such activities and services might include those that improve the experience and employability outcomes of all students, as well as demonstrate how the institution engages with whole schools and colleges, employers and other partners and the local community.
141. Activities and services that are core business of an organisation delivering higher education must not be included. These could include but are not limited to, activities and services such as:

- strategy writing,
  - paying core senior management,
  - paying the living wage,
  - funding subscriptions,
  - delivering essential monitoring and reporting processes, and
  - funding general marketing and recruitment posts.
142. We recognise that some activities and services may contribute to delivering multiple objectives. Where this is the case, we will want to understand how that activity or service will contribute to the different objectives. The institution will need to be clear, for its own auditing purposes how investment has been apportioned between the different objectives being delivered.
143. There is a general requirement that each fee and access plan must make financial assistance and information about financial support available to students. We expect these commitments to be set out in this section of the plan, including the types of financial assistance available for both under-represented groups (and supported by equality of opportunity investment) and assistance for all students supported by promotion of HE investment. We expect financial commitments to students made in a plan to be honoured.
144. We expect all activities and services detailed in a fee and access plan to be monitored regularly and evaluated periodically to ensure that the institution is confident that delivery remains on target and that activities and services meet the needs of students and potential students.
145. We are particularly interested in any new and innovative activities and services the institution will be delivering in 2021/22 to meet its fee and access plan objectives.
146. Where activities and services have titles or acronyms are used, please explain them in full or provide a glossary.
147. The institution should set out clearly which activities and investment it is contributing towards delivering its Reaching Wider commitments to Reaching Wider priority groups.
148. Activities and services delivered at other organisations, which are charities providing education on the institution's behalf should be reflected in this section and identified as such.

### **Section 5 – Monitoring compliance with the general requirements of the 2021/22 fee and access plan**

149. The fee and access plan must address two of the general requirements of a fee and access plan by detailing, in section 5 of the application form, how the governing body intends to monitor compliance with:

- the general requirements and fee levels of a fee and access plan, and
  - how the governing body will monitor performance against the objectives set out in the plan.
150. When assessing this we will expect to understand in some detail:
- the groups or committee structures that monitor the plan in the year to which the plan relates and how they assess the institution's compliance with the plan,
  - the extent of governing body engagement, and
  - the involvement of students in processes, including students where education is provided on behalf of the institution.
151. We recognise that the governing body may not engage in the operational detail and that this level of detail may be delegated to another committee but we need to understand the processes by which assurance is provided to the governing body to enable it to make informed decisions and discharge its duty in a timely fashion.

## Section 6 – Evaluating fee and access plans

152. HEFCW has a duty to evaluate the effectiveness of individual fee and access plans. We require the institution, in section 6 of the application form, to set out how it will evaluate the effectiveness of its plan. We expect the institution to provide information related to:
- the framework it will be using to evaluate the fee and access plan,
  - the roles of groups and committees in the institution in evaluating of the plan,
  - the processes of implementing change following evaluation, and
  - any particular aspects of the plan that will be evaluated along with an explanation for why those aspects will be the focus of the evaluation.
153. Given that evaluating a fee and access plan provides the institution with an opportunity to identify how it can be more effective in its delivery of fee and access plan objectives, we would expect the institution to allocate a reasonable proportion of its fee income to evaluating its plan. If it does so, we require the institution to set out how this investment will be used and the level of investment in the 'Fee Investment' Table of **Annex B**.
154. In 2019, we commissioned Advance HE to review evaluation frameworks being used by institutions in Wales and to provide guidance on effective ways to evaluate Fee and access plans in the future. The Advance HE review can be found on our [website](#). We expect all regulated institutions to familiarise themselves with the review outcomes. In particular, we expect all institutions to develop evaluation frameworks that take in account each of the recommendations and align with the principles in the report.

## Part Three: Evidence to HEFCW in support of the fee and access plan application

155. To support the institution's fee and access plan we require it to submit supporting evidence and data to us, as set out below. Information provided in Part Three of the application form does not need to be published, allowing the institution to be more succinct in its presentation and to refer to documents and data that HEFCW is already aware of.

### Evidence and data to support the plan's objectives, targets and activities

156. We require the institution to submit evidence to us to explain in more detail its fee and access plan application including the current context and priorities. In making its case, we require the institution to explain with some detail and examples. Where reference is made to institutional documentation, we want to understand clearly the extent and focus of alignment, rather than simply providing us with a list or link. Evidence and data should include:

- how the plan aligns to its mission and purpose and key strategic documents, its institutional strategy and underpinning strategies and plans, its strategic equality plan and particularly its widening access strategy,
- how each objective, aligns with wider institutional priorities,
- which objectives and activities explicitly contribute to its region, its contribution to the Well-being of Future Generations goals and civic mission,
- how activities and services will support its under-represented groups,
- the reasons for any objectives and targets that are different from the previous year's plan, including the introduction of new objectives/targets or omission of previous targets,
- how the outcomes of previous performance, monitoring and evaluation exercises have informed the current plan, and
- how impact assessment outcomes have informed the current plan, including equality impact assessments.

157. The institution should take account of effective practice as evidenced by international, national or regional research and data, where relevant.

158. Plans should explain fully the nature and extent of the institution's commitment to the [Reaching Wider Programme](#). Plans should be explicit about:

- activities and investment that supports the HEFCW-funded Reaching Wider Programme institutional plan embedded in the 2022/23 fee and access plan, including the Reaching Wider priority groups,
- any fee plan contribution to regional Reaching Wider Partnership activity work, and
- targets for Reaching Wider institutional activity and/or joint Reaching Wider Partnership working

159. In November 2018, HEFCW agreed that the Reaching Wider Strategy period would be extended to 2021/22 We want to understand clearly how the institution's plans and its work with Reaching Wider Partnerships add value to equality of opportunity regionally and Wales-wide. A key aspect of institutional Reaching Wider provision is supporting priority groups to transition from Reaching Wider Partnership to institutional provision.
160. Where an institution is determining a fee then it will need to explain the basis on which they have done this. This will help us understand the commitment to support the plan's objectives, targets and activities.

### **Evidence and data to support the plan's focus on under-represented groups**

161. The institution must provide evidence and data in this section of the application form, to justify why under-represented groups listed in section 3 of the plan will be supported by the proportion of tuition fee income accounted for in the fee and access plan.
162. We recognise that there are different ways of defining 'groups under-represented in higher education'. Definitions might include under-representation within the institution's student body, including students at partner institutions, as well as under-representation in the higher education system in Wales or the UK more generally. Many individuals with protected characteristics, are under-represented in higher education.<sup>18</sup> It will be for the institution to clearly evidence how the under-represented groups are defined in this section.
163. When providing evidence and data the institution should consider that the aim of widening access in Wales is to secure equality of opportunity, inclusion, progression and success in higher education. Widening access enables learners of all ages, from priority backgrounds, who face the highest social and economic barriers, to fulfil their potential as students, lifelong learners, citizens and employees.
164. When assessing this section of the application we expect to understand how the under-represented groups identified in section 3 of part of the application form align with the institution's mission, priorities and strategic equality plan commitments, as appropriate. We expect the evidence to include previous fee and access plan monitoring and evaluation outcomes and impact assessment outcomes. We will ask for additional information or data to inform our understanding of how under-represented groups have been identified should we need clarification. This may delay our approval of plans.
165. Confirm which Reaching Wider priority groups the institution is targeting and why. The Reaching Wider institutional priority groups are listed in para 110 of the guidance.

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<sup>18</sup> Protected characteristics are: age; disability; gender reassignment; marriage or civil partnership; pregnancy and maternity; race; religion or belief; and sex.

166. When identifying under-represented groups, the institution should balance the scale of investment with the number of groups it proposes to engage with. Investment spread across too many groups may not enable the institution to make sufficient progress to improve equality of opportunity. How the institution has considered this should be demonstrated in this section.
167. Where the under-represented groups being supported vary from those supported in previous years, an explanation should be provided in this section.
168. Not every individual within groups under-represented in higher education will face barriers in accessing, progressing and succeeding in higher education. Institutions should take this into account and target the most disadvantaged students and potential students. NUS Wales' campaigns to support these groups may inform institutions' priorities. Where they do so, this should be clearly set out in this section.

#### **Annex B – information to support fee and access plan application form**

169. This section of the guidance relates to **Annex B** of the fee and access plan application. In completing the tables there, institutions should take account of guidance in section three of part one of the template.
170. **Annex B** is a spreadsheet containing five worksheets. Each worksheet collects the following data (worksheet name in brackets):
  - Fee income from home full-time undergraduate (FTUG) and post graduate certificate in education (Qualified Teacher Status) (PGCE (QTS)) students under the current fee regime (Fee income)
  - Location, type, level, partnership information and forecast student numbers for all activity controlled by the applicant (Locations)
  - Financial forecasts (Financial information)
  - Fee and access plan income forecast expenditure (Fee investment)
  - Targets (Targets)and are described in more detail in paragraphs 171-213 below.
171. The two tables published in **Annex B** of this circular are sample tables only. One relates to Higher Education Institutions and one relates to Further Education Institutions (FEIs). Applicants must complete an electronic version of one of the tables. An individualised template, in Excel format containing the tables to complete, will be sent to currently regulated institutions. This will be prepopulated by HEFCW with information from the 2021/22 fee and access plan and, for currently regulated HE institutions, from the December 2020 forecast submitted to HEFCW.
172. Data relating to the amount that was expected to be invested in equality of opportunity, promotion of higher education, evaluation, forecast investment, Reaching Wider and student financial support in the 2021/22

fee and access plan will be prepopulated in the '**Fee Investment**' worksheet. Forecast data for 2022/23 relating to the gross home FTUG tuition fee (including PGCE) as submitted to HEFCW in the December 2020 forecast will be prepopulated in the '**Financial Information**' worksheet (HEIs only).

173. Institutions not regulated currently should contact [regulationadvice@hefcw.ac.uk](mailto:regulationadvice@hefcw.ac.uk) in line with the process set out on our website in order to receive an investment worksheet, [Notification of intention to submit a fee and access plan](#).
174. **Information should only be entered in the cells shaded in yellow.** All other cells in each worksheet should not be amended in any way. This is to maintain formulae such as those used to calculate totals and to ensure validation checks and comparisons can be carried out. Therefore all non-yellow cells are locked to prevent accidental alteration of the spreadsheet. To view the formulae in any of these cells it is possible to unlock each sheet by going to the '**Review**' ribbon and selecting '**Unprotect sheet**' and entering the password **FAP22**. **The structure and layout of the spreadsheet should not be amended in any way either.** Maintaining a standard layout for completed templates assists the process for prepopulating future year's fee and access plan templates with data from the preceding year, such as that outlined in paragraph 164 for this fee and access plan.
175. Simple validations have been added to each worksheet and are intended as an aid to completing the table, for instance, where student numbers are returned fees would also be expected to be returned. The validations are not intended to imply any expectations from HEFCW. If data entered trigger a validation, a message will appear in red at the right of the table. A message 'Please review the messages in red to the right of the table' will appear in the grey bar at the top of each worksheet to alert the applicant to the presence of these messages.
176. There are six worksheets in **Annex B**, those listed in paragraph 162 above, and another worksheet labelled '**Lists**' which contains lookup information. This worksheet aids the functioning of other worksheets, contains no formulae and is for reference only. As no information should be entered in this worksheet or deleted from it all cells are locked.
177. If you have any questions about the workbook or have any technical difficulties with it, please contact the Statistics Team at: [hestats@hefcw.ac.uk](mailto:hestats@hefcw.ac.uk).

#### Audit of data returned on Annex B

178. Processes and data used in the completion of the tables in **Annex B** are included in the scope of the external audit of higher education data. Systems and processes used to complete the tables are also included in the scope of the annual internal audits of higher education data systems and processes. HEFCW may request further detail on how targets

included on the ‘**Targets**’ worksheet of **Annex B** were calculated and we may commission an external audit that focuses on the processes and data used in the calculation of the targets.

Fee income from home full-time undergraduate and PGCE (QTS) students under the current fee regime

179. The table in the ‘**Fee income**’ worksheet collects information about fee income and student numbers relating to provision for home full-time undergraduate and PGCE (QTS) students under the current fee regime which the applicant controls.

Include information about courses that:

- the applicant provides, controls and validates themselves,
- the applicant provides and controls which is validated by another body but are not part of a franchise<sup>19</sup> arrangement,
- the applicant provides and controls, that is validated by themselves, their parent or another body, where they are a subsidiary of that parent and the parent is not including the courses in their fee and access plan,
- the applicant franchises out to other charitable providers in the UK that are charities or are parents of charitable subsidiaries that are not submitting their own fee and access plan and the students are based in the UK, and
- are delivered by a charitable subsidiary in the UK, where the applicant is the parent of that subsidiary, and the subsidiary is not submitting their own fee and access plan.

Do not include information about courses that:

- that the applicant provides on behalf of another provider via a franchise agreement,
- that the applicant does not provide and that the applicant validates only,
- that are delivered by a subsidiary, where the applicant is the parent of that subsidiary, and the subsidiary is submitting their own fee and access plan,
- that the applicant franchises out to a non-charitable provider, and
- that are delivered by a non-charitable subsidiary, where the applicant is the parent of that subsidiary.

180. The data to be returned in the table are split into franchised out / subcontracted, and not franchised out / subcontracted. For each type of student listed in the table the forecast number of students should be entered in **column C** and the total forecast fee income that relates to them in **column D**. Data entered in **column C** and **column D** should be consistent with the data collected in the ‘**Financial information**’ worksheet.

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<sup>19</sup> HEFCW uses the term ‘Franchise’ when referring to provision delivered via partnership arrangements which includes sub-contractual/collaborative arrangements – refer to glossary on our [website](#).

Location, type, level, partnership information and forecast student numbers for all activity controlled by the applicant

181. The table in the ‘**Locations**’ worksheet collects information about all the activity forecast to take place in 2022/23 that the applicant controls. This includes both full-time and part-time provision at postgraduate and undergraduate levels and further education and below. It collects information about the organisation providing the provision, the location, type and level of provision, forecast student numbers and the applicant’s partnerships. Activity both in and outside the UK should be recorded here.
182. Where partnerships are expected to be in place for the 2022/23 academic year but will not be finalised at the time of submitting the 2022/23 fee and access plan application to HEFCW in March, institutions should exclude them from the submission. If a new partnership is finalised in 2022/23 and relates to a full-time undergraduate and PGCE (QTS) course requiring student support then a variation to the plan will be required.
183. Data to be returned in the ‘**Locations**’ worksheet includes all activity that the applicant controls. This includes all modes and levels including further education and below, based in the UK or overseas including the EU that:
- the applicant provides, controls and validates themselves,
  - the applicant provides and controls which is validated by another body,
  - the applicant provides and controls, that is validated by themselves, their parent or another body, where they are a subsidiary of that parent and the parent is not including the provision in their fee and access plan,
  - a subsidiary of the applicant delivers, where the applicant is the parent of the subsidiary and the subsidiary is not submitting their own fee and access plan,
  - the applicant franchises out,
  - is the applicant delivers in collaboration with a partner, and
  - the applicant does not provide and validates only.
184. One row of data should be provided for each combination of providing organisation, location address, type and level of activity and type of partnership. This table is designed to obtain an overview of all activity the applicant is engaged in, therefore partnership information will not be relevant to every row, as indicated in paragraph 182 below.
185. The name of the organisation providing the activity should be entered in **column B** and its UKPRN in **column C**. If the activity is provided by the applicant then the applicant’s name and UKPRN should be entered. If the activity is provided by another organisation via a partnership such as a franchise arrangement, a subsidiary, a validation arrangement or other sub-contractual or collaborative arrangement then the name and UKPRN of that other organisation should be entered.

186. The address of the campus where the provision is taking place, or of the organisation itself if there is only one main campus should be entered in **column D**.
187. In **column E**, the type of the activity should be entered. Learning and teaching, or research can be selected from the drop down list. If the type of activity is neither learning and teaching or research, a description should be typed in **column E**.
188. In **column F**, the level of study should be selected from the drop down list. If the qualification being studied does not fall into the levels available in the drop down list, (postgraduate, undergraduate, further education) then the level should be typed in **column F**.
189. In **column G**, the total forecast number of students undertaking the activity should be entered.
190. If the activity is or is not being delivered by a partner, this should be indicated in **column H**. If the activity is not being delivered by a partner then **columns I, J and K** do not need to be completed. If the partner is or is not a charity should be indicated in **column I** using the Y/N drop down list. The type of partnership should be entered in **column J** using the drop down list, and the date of the partnership agreement should be entered in **column K**.
191. We would only expect university-owned research locations to be included in this section. These should only be included if they are different to their primary teaching location.

#### Financial forecasts

192. As noted in paragraph 163 above, there are two versions of the '**Financial information**' worksheet, one for HEIs and one for FEIs. These are included in the sample tables in Annex B of this circular, but previously regulated applicants will receive only the version relevant to them in their individualised template.
193. The '**Financial information**' worksheet collects information which reconciles forecast income in 2022/23 from home full-time undergraduate and PGCE (QTS) fees under the current fee regime entered in the '**Fee income**' worksheet with forecasts provided to either HEFCW (HEIs) or Welsh Government (FEIs), or subsequent updates to those forecasts.
194. There are two tables in this worksheet, and applicants must complete only **one**.
195. The table to complete is indicated when entering Y or N to the first question, which asks if the fee and access plan has been prepared on the basis of forecasts already submitted to HEFCW (HEIs) or Welsh Government (FEIs). Y or N **must** be entered here to indicate which table

to complete and for the validations in this worksheet to work correctly. If completing this worksheet on the basis of a **submitted** forecast, then **table 1** must be completed. If completing this worksheet on the basis of a **new** forecast then **table 2** must be completed.

196. The reconciliations have provisionally been populated with text indicating adjustments that were required to reconcile previous fee and access plans to forecasts. These should not be regarded as exhaustive and should be overwritten where applicable.
197. Forecasts are completed following the guidance issued by HEFCW in [W20/36HE: Request for updated forecasts 2020 - HEFCW](#) (HEIs) or by Welsh Government (FEIs only).
198. The **'Income Validation'** section (included in both table 1 and 2) in this worksheet compares the fee and access plan forecast total home full-time undergraduate and PGCE (QTS) fees under the current fee regime from the **'Fee income'** worksheet with the forecast submitted to HEFCW/Welsh Government (table 1) or the new forecast (table 2) and calculates the difference which is displayed as the variance. Applicants are requested to list reconciling items which explain the variance. Once reconciling items and the associated forecast income have been completed the final figure of the table should equal zero. If it does not then a message will appear in red to the right of the table, however a tolerance of +/- £5k is allowed in the validations. Fee income is collected in £ in the **'Fee income'** worksheet and in £'000s in the **'Financial Information'** worksheet. Data from the **'Financial Information'** worksheet and the **'Fee income'** worksheet are both rounded to the nearest £1,000 before any validation is applied.
199. If the applicant is providing new forecast data and is therefore completing table 2, then information relating to income, expenditure, surplus and consolidated statement of cash flow should be provided in the yellow cells for all years indicated. The guidance for completion of these items can be found in the guidance issued by HEFCW or Welsh Government.
200. If you have any questions about financial forecast definitions used in this worksheet, please contact the Sustainability and Assurance Team at [assurance@hefcw.ac.uk](mailto:assurance@hefcw.ac.uk).

#### Fee and access plan income forecast investment

201. The table in the **'Fee investment'** worksheet sets out investment committed to achieve each objective, to evaluate fee and access plans, for reaching wider and for financial support.
202. In sections a) and b) of this table, **chosen objectives** and forecast investment as outlined in the applicant's 2021/22 fee and access plan are prepopulated at the top of the table in the section headed 'Objectives from 2021/22 fee and access plan'. If the applicant wishes to continue to use some or all of these objectives then the 2021/22 forecast investment

should be entered in the yellow cells opposite each relevant objective in **column K**, and leave **column K** blank for any non-relevant objectives.

203. If the applicant wishes to add new objectives, these should be entered in the section headed 'New objectives' in the yellow cells in **column B**, and the corresponding 2022/23 forecast investment entered in **column K**.
204. It is not necessary to amend prepopulated 2021/22 forecast investment for any 2021/22 objectives which are not to be used or to provide 2021/22 forecast investment for any new objectives.
205. Where investment is forecast against more than one objective, it should be split between objectives.
206. **Investment to deliver objectives to improve equality of opportunity must relate only to groups under-represented in higher education.**
207. In the remaining sections of this table, c) to f) the 2021/22 figures have also been prepopulated from the 2021/22 fee and access plan.
208. Forecast investment on evaluation of the effectiveness of fee and access plans is collected in section (c) and income being spent on Reaching Wider in section (e).
209. Student financial support activities will be a part of total investment in objectives to support equality of opportunity and/or the promotion of higher education (as set out in (a) and (b)). Section (f) asks the applicant to separately identify forecast investment in student financial support activities **already included** in (a) and (b) and the anticipated numbers of students supported.
210. Where the percentage of income forecast to be invested in equality of opportunity (a) or promotion of higher education (b) is different to that in 2021/22, or the percentage of expenditure on student support (f) is lower than in 2021/22, you will be prompted to explain the reason on the worksheet.

### Targets

211. A fee and access plan should contain SMART institutional targets that contribute to demonstrating the applicant's commitment to increasing and/or maintaining the number of students from under-represented groups in higher education, or other fee and access plan objectives, as appropriate. Targets should demonstrate the level of ambition and pace of progress to be made as a result of fee and access plan provision and investment.
212. HEFCW recognises that it is neither beneficial nor meaningful to set targets in all fee and access plan areas. Plans should contain sufficient targets to provide a full account of, and return on, the level of public

investment to which the plan relates. The level of public investment will differ between HE providers, as will the quantity of targets.

213. The table in the '**Targets**' worksheet collects data about targets and objectives set by the applicant. Further information relating to targets and objectives can be found in paragraphs 109 to 121.
214. Long term targets and a milestone target for the year that the fee and access plan relates are required. All targets must be supported by a target descriptor that includes numbers and/or percentage increases or decreases as appropriate. The corresponding number/percentage must be included as contextual information.
215. The target, target descriptor and contextual information for both the long term and milestone targets should be entered in the '**Targets**' worksheet as described below.
216. A target should be based on National measures and additionally can an institution-specific target. This should be indicated in **column B** using the drop down list.
217. A description of the target, that is, what the target aims to achieve, should be given in **column C**, including, either a percentage or a number or both.
218. **Column D** asks for the objective, and must correspond to those listed in the '**Fee investment**' worksheet relating to equality of opportunity or promotion of higher education. Each objective must have at least one target included in the '**Targets**' worksheet.
219. **Column E** and **column F** request information about whether the target is the responsibility of more than one fee and access plan applicant.
220. **Column G** asks for the baseline year which will normally be the year for which the most recent data are available, or if this is not the case, an explanation should be provided in the commentary in **column U**. **Column H** and **column I** ask for the baseline data. Where only a number or only a percentage is given, contextual information should be included in **columns J, K and L**.
221. **Column M** and **column N** ask for the milestone target that the applicant is aiming towards. A percentage, a number, or both where possible, must be included. Where only a number or only a percentage is given, contextual information should be included in **columns O, P and Q**. For example, if the percentage increase of students from a particular group is a target, you should include in the contextual information the expected number increase of this group and/or the expected population of students that the percentage is based on. Population numbers should be consistent with other information provided in this Annex and your latest student number forecasts, i.e. those returned to HEFCW in December

2020 or updated figures. This is only required for the 2022/23 milestone targets and the baseline data and not for future targets.

222. **Column R, S and T** ask for the longer term target, requesting the year the target relates to, the number and/or the percentage.
223. The contextual data provides information about how the target was calculated, the scale of the activity and the level of performance. It will enable an assessment of the extent of the ambition and progress to be made by HEFCW and the board of governors. The contextual information will be used to understand more fully whether any increases or decreases in the target translate to significant differences in numbers of students where percentages are given or in percentages where numbers are given.
224. Some points to note in completing the **'Targets'** worksheet:
- Targets should be sufficient in number, and at the right level, to inform monitoring. Some 'targets', where they are not sufficiently SMART, may be better placed and articulated in the narrative provision section of plans, this includes targets without data or baselines. Targets should enable HEFCW and the governing body to account for progress and investment.
  - The Communities First programme was phased out in March 2018. Fee and access plan targets based on Communities First data will be difficult to monitor and we advise against them.
  - For targets based on destinations that relate to outcomes from the HESA Graduate Outcomes survey, baseline data may have to be based on the HESA destination of leavers from higher education (DLHE) survey. Targets may need to be more ambitious than when both the baseline and target were based on the DLHE to take account of the extended time period for the new survey.
  - Plans must include targets that are achievable by the end of academic year 2022/23, or they must include 2022/23 milestone targets that contribute towards a longer-term target, to enable progress to be reported by December 2023. For example, targets measured by achievement against UK performance indicator benchmarks should set targets indicating progress against HESA's 2021/22 performance indicators for HEFCW to analyse targets against benchmark data available by December 2023.
  - Where the target is measurable by the end of 2023 but does not relate to 2022/23 data, a note should be made in the commentary box to explain the data used.

#### Reasons for collecting data in Annex B

225. Data returned on the **'Fee income'** worksheet provides the total fee income available for investment and also enables HEFCW to assess the average fee levels home domiciled FTUG and PGCE (QTS) students under the current fee regime are being charged.

226. Data returned on the '**Locations**' worksheet will be used to provide data to be considered in HEFCW's assessment of quality; to monitor the partnership arrangements in place in the UK, and to monitor partnership and campus arrangements in place abroad.
227. Data returned on the '**Financial information**' worksheet will be used in the assessment of financial sustainability.
228. Data returned on the '**Fee investment**' worksheet enable HEFCW to assess the level of fee income from home FTUG and PGCE (QTS) students under the current fee regime that will be invested in equality of opportunity, promotion of higher education, Reaching Wider Partnerships, evaluation of the effectiveness of fee and access plans and student financial support.
229. Data returned on the '**Targets**' worksheet will be used by HEFCW to assess the extent to which the applicant has met its fee and access plan objectives.

## How HEFCW will manage the 2022/23 fee and access plan process

219. The following information sets out the processes for an institution submitting a fee and access plan for the first time and the approval process by HEFCW. Institutions currently regulated will be contacted separately, setting out our expectations of them.
220. The institution must include the following information:
- Regulatory information that demonstrates that the institution is eligible to enter the regulated sector in Wales.
  - Its detailed commitment to improving equality of opportunity and promotion of higher education.
  - Supplementary evidence to support the fee and access plan.
  - Evidence of governing body approval.
221. The institution will receive two templates:
- A fee and access plan application form, including a governing body approval form.
  - An excel document to supplement information provided in both the regulatory information and the fee and access plan
- For institutions that are currently regulated, HEFCW will pre-populate the templates where it holds the relevant data. For institutions applying for a fee and access plan for the first time, HEFCW will provide a standard application form, without investment information, on request from [regulationadvice@hefcw.ac.uk](mailto:regulationadvice@hefcw.ac.uk).

### Submission

222. Institutions applying for a fee and access plan for the first time should contact HEFCW in the first instance to discuss its intended submission. As part of that discussion we will agree suitable timelines for submission.
223. The governing body of the institution is responsible for a fee and access plan and must approve both the initial application to HEFCW and the final re-submission of a plan, where the plan has been revised following discussions with HEFCW. We expect student representatives to be part of that approval process. The institution may wish to secure delegated authority from its governing body, at an early stage and if appropriate.
224. Completed fee and access plan applications should be uploaded to our secure site at <https://transfer.hefcw.ac.uk/uploadfap>. All file names should be clearly labelled with the institution's name, a description of the file and the date of submission. Please note that there is a maximum file name length of 255 characters. Please submit:
- **Annex A** in Word format
  - **Annex B** in Excel format.
  - The governing body sign off should be submitted in PDF format.

## HEFCW's assessment of fee and access plans

225. Fee and access plan applications and HEFCW's initial analysis of them will be considered by HEFCW's Regulation Committee.<sup>20</sup> HEFCW will provide initial feedback to institutions, taking account of the Committee's advice.
226. HEFCW will assess the fee and access plan applications against the following criteria:

The robustness of evidence as it relates to:

### Regulatory information

- being an institution in Wales,
- providing higher education,
- being a charity,
- financial viability,
- effective organisation and management of financial affairs, and
- the quality of the education provided or provided on its behalf.

The robustness of evidence as it relates to:

### Fee and access plans

- providing clear information about fee levels, ensuring fees do not exceed that permitted to be charged,
- explaining fully how student partnership has informed the development of the fee and access plan,
- identifying and supporting under-represented groups to improve equality of opportunity in higher education,
- setting ambitious objectives and the extent to which they demonstrate the institution's intentions to improve equality of opportunity and the promotion of higher education,
- setting targets which demonstrates a long term commitment to improve student outcomes, aligning with HEFCW's national measures,
- committing an appropriate proportion of fee income to improve equality of opportunity and the promotion of higher education,
- demonstrating how activities and services will effectively contribute to delivering the objectives, and
- detailing governance arrangements and student engagement, including how the institution will monitor and evaluate the 2022/23 fee and access plan.

## HEFCW's fee and access plan approval and rejection process

227. Once HEFCW's fee and access plan analysis and iteration processes with the institutions has been completed, HEFCW will approve or move to reject plans.

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<sup>20</sup> [www.hefcw.ac.uk/en/about-us/governance/committees/](http://www.hefcw.ac.uk/en/about-us/governance/committees/)

HEFCW will not approve fee and access plans until it is satisfied that the institution has both provided appropriate regulatory information and demonstrated satisfactorily their commitment to improving equality of opportunity and promoting higher education.

#### Approval and publication

228. HEFCW will confirm fee and access plan approval by writing to the institution's governing body.
229. Where the institution is successful in its application, it must publish the required elements of its approved plan on its website, including the date of HEFCW approval and the date of publication.<sup>21</sup> We expect the fee and access plan (part 2 of the application form) to be published on the same web page that tuition fees are set out. The approved fee and access plan can be linked to other webpages as necessary. It would be good practice to include a summary of the plan on the webpage with the link. The link to the published fee and access plan must be shared with HEFCW within 14 days of approval. Any changes to the link must be communicated to HEFCW within seven days of the change being made.
230. Fee and access plan applications can be submitted to HEFCW in the institution's corporate style, recognising that the approved version will be published and forms part of the institution's corporate documentation. However, the published text **must** not vary in any way from the text in the plan approved by HEFCW.
231. There is no need to publish any HEFCW guidance notes, including those which form part of the application form.
232. HEFCW will notify the Student Loans Company (SLC) of approved fee and access plans and full-time undergraduate fee limits for 2022/23 as agreed in the fee and access plan. Additionally, HEFCW will confirm which charities are delivering full-time undergraduate courses on behalf of regulated institutions with the SLC.

#### Rejection

233. If the institution does not have a fee and access plan approved following HEFCW's approval process as set out above, it may continue its dialogue with HEFCW and/or be subject to the processes set out below, and described on our [website](#), relating to HEFCW's processes for intending to reject a plan.
234. If HEFCW is not satisfied that the institution meets its criteria for approving a plan after a reasonable iteration is complete, it will write to the governing body (to the Chair and Clerk of the governing body and

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<sup>21</sup> This guidance indicates that the regulatory information (section one) of the fee and access plan is for HEFCW and not for publication.

copied to the Accountable Officer) setting out the reasons for its proposed intention to reject plans.

235. HEFCW will not approve a fee and access plan where:
- regulatory information provided by the institution is considered to be inadequate<sup>22</sup>,
  - the institution's fee limits exceed the maximum applicable fee limit specified in the legislation<sup>23</sup>, or
  - an institution's governing body has not confirmed its approval of the plan.
236. HEFCW will not approve a fee and access plan where it considers the criteria for the assessment of the fee and access plans are not satisfactorily met.
237. If HEFCW intends to reject a fee and access plan it must provide the institution's governing body with a warning notice. The diagram on our [website](#) sets out the stages of the notice process.

#### Exit from the regulatory system

238. There are three ways in which a regulated institution can exit the regulatory system including:
- not applying for a fee and access plan to be approved,<sup>24</sup>
  - not having an application for a plan approved, or
  - having an approved plan withdrawn.
239. HEFCW has a statutory duty to withdraw approval of a fee and access plan where it is no longer satisfied that the institution meets the definition of a regulated institution. HEFCW has powers to withdraw its approval of a fee and access plan in other circumstances.<sup>25</sup>
240. Where a regulated institution exits the system:
- HEFCW's powers in relation to the quality of education provided by, or on behalf of, the institution continue to apply in relation to the institution's designated courses.
  - HEFCW may give the governing body of the institution a direction to take (or not take) specific steps for the purpose of dealing with, or preventing a failure to comply with, a general requirement of an approved fee and access plan if, at the time of the failure, the fee and access plan was in force.
  - the institution's governing body will be required to ensure that fees, for academic years starting within the period to which its fee plan related, continue to comply with the applicable fee limit.

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<sup>22</sup> Information regarding being an institution in Wales, providing higher education and being a charity that is financially viable with sound arrangements for the organisation and management of its financial affairs and quality of all the education provided by, or on behalf of, it.

<sup>23</sup> [The Higher Education \(Amounts\) \(Wales\) Regulations 2015](#)

<sup>24</sup> HEFCW will invite applications for fee and access plans annually, until further notice.

<sup>25</sup> HEFCW's powers for intervention are set out in its [Statement of Intervention](#) (Annex B).

- the institution’s governing body will be required to ensure that students do not lose fee protection and that fees, for academic years starting within the period of its most recent fee and access plan, continue to comply with the relevant fee limit for the duration of students’ courses.

### **Variation of a fee and access plan**

241. While fee and access plans are in force<sup>26</sup>, regulated institutions are required to inform HEFCW immediately of any changes to their charitable status, principal location or activities that may impact on their ability to satisfy the criteria under Section 2(3) of the 2015 Act.
242. Where there are any changes to approved fee and access plans and their commitments, regulated institutions should discuss the implications of these changes with HEFCW and their student representatives at the earliest opportunity and in advance of any changes being made. Such changes may include, but are not limited to:
- changes to tuition fees,
  - provision at new locations,
  - new or revised arrangements for higher education provided on behalf of institutions, or
  - where a body providing learning and teaching on behalf of institutions ceases to be a charity while the fee and access plan is in force.
243. Variations to fee and access plans will require HEFCW agreement.
244. Any financial commitments to students made in plans approved by HEFCW must be honoured and are not subject to a variation.
245. Where a published plan is varied with HEFCW approval, the institution must publish its revised plan and include the revised date of HEFCW’s approval and the revised date of publication. A version of the original plan should always be made available when requested. Where a variation to a plan is not approved by HEFCW the existing published plan will stand.
246. Detailed guidance on varying a fee and access plan is provided on the [HEFCW website](#).
247. Variations that include changes to fee levels should be made before students are accepted on to a course. Where the institution is seeking a variation with a view to expanding the qualifying courses offered, students must not be accepted on to the courses until the variation is approved by HEFCW and the agreed courses and fees are confirmed. Institutions must ensure that commitments to students about their fees are honoured and comply with CMA guidelines.

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<sup>26</sup> The period in which a plan is “in force” is the period beginning with the day on which it is approved and ending: either the day on which the period to which the plan relates expires (i.e. the end of the academic year in respect of which the plan has effect); or the date of a withdrawal notice under section 38 or 39, whichever of those occurrences is the earlier.

## Appendix 1: Regulated institutions' obligations

1. In successfully applying for a fee and access plan all governing bodies of regulated institutions are obligated to :
  - ensure that regulated course fees do not exceed the applicable fee limit
  - comply with any direction lawfully given by HEFCW
  - take into account any HEFCW guidance when complying with a direction issued by HEFCW in relation to compliance with fee limits
  - comply with the general requirements of an approved fee and access plan
  - cooperate with HEFCW in exercising its duties to monitor and evaluate the compliance and effectiveness of a plan
  - take into account HEFCW guidance on quality
  - take into account advice in relation to provision which is, or is likely to become, inadequate in terms of quality
  - cooperate with HEFCW's duty to assess the quality of its education and education provided by an external provider on its behalf
  - comply with any requirement imposed by the financial management code
  - comply with a direction in respect of failure to comply with the code
  - take into account any guidance contained in the financial management code
  - cooperate with HEFCW's functions in respect of failure to comply with the code
  - cooperate with HEFCW's duties to monitor compliance with the code.

## Appendix 2: Summary of key changes made to the latest fee and access plan guidance

1. The 2022/23 fee and access plan guidance is largely similar to the previous version of the guidance. Some amendments have been made to strengthen our expectations in particular areas and to reflect changes to our process for submitting fee and access plans in 2022/23. The key areas where the fee and access plan guidance has been amended are as follows:
  - Strengthening requirements that institutional investment in improving equality of opportunity should only support the institutions' under-represented groups.
  - Clearer expectations that institutions set out longer-term targets.
  - Expectations on institutions to take account of Advance HE's review of evaluation framework and institutions to invest in their evaluation of fee and access plans.
2. The HEFCW Regulation Committee's advice has been taken into account. HEFCW's [Regulation Committee](#) will review the fee and access plan guidance periodically to contribute to improving the process and we will continue to engage in a dialogue with regulated institutions on all aspects of fee and access planning.

## Fee and Access Plan Application Form

<b>Institution name:</b>	
<b>UK provider registration number:</b>	

	<b>Lead institutional contact</b>	<b>Additional institutional contact</b>
<b>Contact name:</b>		
<b>Job title:</b>	<p>We expect this individual to be a member of the senior management team that is responsible to the governing body for overseeing the fee and access plan application.</p> <p>All correspondence will be sent to this contact.</p>	<p>We would expect this individual to be the member of staff that is delegated responsibility for developing the fee and access plan.</p> <p>This contact will be copied into all correspondence.</p>
<b>Telephone number:</b>		
<b>Email address:</b>		

The institution is not required to publish this page.

## Part One: Regulatory Information (not required for publication)

Section 1: Is the fee and access plan applicant an institution?	
<p>Is the fee and access plan applicant one of the following?</p> <ul style="list-style-type: none"> <li>• a university formed by Royal Charter,</li> <li>• a Higher Education Corporation</li> <li>• a Further Education Corporation</li> <li>• a body that trains members of the education workforce.</li> </ul>	<p>Yes / No (delete as applicable)</p>
<p>If the answer is 'yes' to the above, which type of institution is the fee and access plan applicant?</p>	<ul style="list-style-type: none"> <li>• a university formed by Royal Charter</li> <li>• a Higher Education Corporation</li> <li>• a Further Education Corporation</li> <li>• a body that trains members of the education workforce.</li> </ul> <p>(delete as applicable and provide a link to the documentation that evidences this statement or submit the documentation if it is not publicly available)</p>
<p>If the answer is 'no' to the above, please confirm the date the Welsh Government designated the fee and access plan applicant as an institution and attach a copy of the correspondence from Welsh Government as part of the application.</p>	<p>DD/MM/YYYY</p>
Section 2: Is the institution located wholly or principally in Wales?	
<p>Principal address and legal address where different</p>	
<p>Are there any other names under which the institution operates?</p>	

Confirmation of where all learning and teaching activities are located and how many students attend courses at that those locations.	Provide this information in the 'Locations' table in Annex B.
Where all other (non-learning and teaching) activities are located.	Provide this information in the 'Locations' table in Annex B.
<b>Section 3: Does the institution provide higher education (HE)?</b>	
Provide a description of the higher education provided by the institution in Wales, including the awards provided.	[If the institution subscribes to and returns data to HESA, we will use that data, so this section can be left blank.]
Provide the full-time equivalent (FTE) numbers of students in Wales that may be taking the higher education courses at the date of application and for three years previously.	[If the institution subscribes to and returns data to HESA, we will use that data, so this section can be left blank.]
Is the institution delivering courses, within the scope of the fee and access plan, that lead to a qualification it awards?	Yes / No
If no, confirm who is the awarding organisation is and the nature of the arrangement with the awarding body.	<p>The awarding organisation must be either a university in the United Kingdom, Pearson or the Scottish Qualifications Authority.</p> <p>If the awarding organisation is a university, the institution applying for a fee and access plan must be in control of the course and this must be confirmed here.</p> <p>If the awarding organisation is either Pearson or the SQA then no further clarification is provided.</p> <p>Agreements between the institution delivering the qualifying course and the awarding organisation must be submitted alongside the application. The relevant file names should be set out here.</p>

<b>Section 4: Is the institution a charity?</b>	
Confirmation that the institution is a charity	Yes / No The institution must be a charity. All Chartered Universities in Wales and all Higher Education Corporations in Wales are registered charities.
Provide the institution's charity registration number and the name and address of its charity regulator.	
Where the institution is not registered with a charity regulator, provide the reasons for this together with a copy of any governing document.	
Provide the names, address and charity registration number of other bodies delivering full-time undergraduate courses on the institution's behalf.	This will be captured in the 'Locations' table of Annex B
<b>Section 5: Is the institution financially viable?</b>	
The institution's corporate group structure, including details of all group companies or organisations (including subsidiaries, parent/holding companies and associate or joint ventures).	Reference should be made to the title of the documents submitted – any narrative to support the documentation should be completed here.
The institution's most up to date financial strategy or confirmation that the most recent financial strategy submitted to HEFCW is the current strategy. Information should include how the institution assesses and reviews its sustainability, including the use of sustainability assessments.	Reference should be made to the title of the documents submitted – any narrative to support the documentation should be completed here.

<b>If the institution is a university currently regulated by HEFCW</b>	
Financial forecast information to supplement information previously submitted to HEFCW.	The institution must complete the 'financial information' table in Annex B.
<b>If the institution is <u>not</u> a university currently regulated by HEFCW</b>	
Last 3 years' audited financial statements.	Reference should be made to the title of the documents submitted – any narrative to support the documentation should be completed here.
Last 3 years' external audit annual reports.	Reference should be made to the title of the documents submitted – any narrative to support the documentation should be completed here.
<p>Financial forecasts that cover the estimated current year together with at least three year forecasts (with the support of a parent company guarantee, if necessary) or reference to evidence previously submitted to HEFCW demonstrating that they have:</p> <ul style="list-style-type: none"> <li>• an adequate cash flow to remain solvent, that is, sufficient liquidity to pay debts as they fall due and</li> <li>• an adequate balance sheet, that is, that they maintain a net total assets position and would not incur deficits if these would result in a net total liabilities position.</li> </ul>	Where the institution is a college and submits forecasts to Welsh Government then these can be used.
<b>Section 6: Are the institution's financial affairs well-managed?</b>	
Has the institution got financial management processes that are well governed and controlled adequately and effectively?	<p>Information should include</p> <ul style="list-style-type: none"> <li>• Last 3 years' internal audit annual reports, giving assurance levels over core financial controls</li> </ul>

	<ul style="list-style-type: none"> <li>• Last 3 years' financial forecasts</li> <li>• Information obtained from our assurance processes relating to governance structures including audit committee, finance committee or equivalent.</li> </ul>
How does the institution plan and manage activities to remain viable?	Provide information on the institution's budget setting and monitoring process, and the process for the production, distribution and monitoring of management accounts
Has the institution got robust and comprehensive systems of risk management and internal control?	Information should include: <ul style="list-style-type: none"> <li>• Last 3 years' internal audit annual reports, giving assurance levels over risk management processes</li> <li>• Last 3 years' internal audit annual reports, giving overall internal control opinion</li> </ul>
Has the institution got effective arrangements for the management and quality of data and for the assurance of data used for internal decision making?	Information should include: <ul style="list-style-type: none"> <li>• Last 3 years' internal audit reports of HE data systems and processes</li> <li>• The latest external data audit</li> </ul>
Has the institution got regular, reliable, timely and adequate management accounts or equally robust information to monitor operational and financial performance?	The institution should provide a brief overview of the information typically contained within their management accounts, how often these are produced and with whom they are shared. If the institution does not prepare management accounts, describe any other relevant processes
Does the institution report information regularly, comprehensively and correctly to appropriate senior management and those charged with governance?	Information should include: <ul style="list-style-type: none"> <li>• Last 3 years' internal audit annual reports, giving assurance levels over governance processes</li> <li>• Last governance effectiveness review, if undertaken externally</li> </ul>

<p>Does the institution manage its estate in a sustainable way in line with an estates strategy?</p>	<p>An estates strategy or equivalent, as well as information on the monitoring of estates performance would help to provide evidence of managing the estate in a sustainable way</p>
<p>Is the institution able to meet all the necessary data capture and reporting requirements for HEFCW including those administered by the Higher Education Statistics Agency (HESA) and other bodies, as required by HEFCW?</p>	<p>[If the institution is already a regulated institution, we will use (subject to confirmation) the following data:</p> <ul style="list-style-type: none"> <li>• Last 3 years' internal audit reports of HE data systems and processes</li> <li>• The latest external data audit</li> <li>• The annual HESES survey</li> <li>• Data provided to the LLWR</li> <li>• Student, student destination, staff, estates, finance and business and community interaction data provided to HESA and</li> <li>• The annual assurance return.]</li> </ul>
<p>Does the institution comply with the principles of the Higher Education Code of Governance (Committee of University Chairs, December 2014) unless adherence to alternative, equally robust arrangements can be evidenced.</p>	<p><b>[Amend/delete</b> the following statements <u>and</u> provide additional information, under (ii) below, where appropriate:</p> <p>(i) The institution confirms that it complies/does not comply with the principles of the Higher Education Code of Governance (Committee of University Chairs (December 2014).</p> <p>(ii) The institution adheres to alternative, equally robust governance arrangements and the following information sets out these arrangements.</p> <p>(iii) The institution cannot demonstrate adherence to robust governance arrangements.]</p>
<p>Does the institution comply with the statutory requirements relating to external audit and is owned, managed and run by 'fit and proper persons' by providing:</p>	<p>[If the institution is already a regulated institution, we do not require this information</p> <p>In respect of the institution's identity non-regulated institutions should provide, for example a charter, certificate of incorporation, etc.</p>

<ul style="list-style-type: none"> <li>evidence of the institution’s identity and that of key individuals (for example, the Governing Body, Vice Chancellor, Principal, directors, shareholders, trustees), along with their skills and experience and</li> <li>confirmation that directors (if a company) or trustees (if a charity) are eligible to act as either directors or trustees and have not been disqualified from acting as directors or trustees.</li> </ul>	<p>In respect of individuals, non-regulated institutions should provide sufficient information on key individuals to allow searches to be made of both Companies House and Charity Commission records, including lists of disqualified directors/trustees.]</p>
<p><b>Section 7: Is the education provided by and on behalf of the institution adequate to meets the needs of students?</b></p>	
<p>Confirmation that there are internal quality assurance procedures in place for all of its education provision.</p>	<p>Confirmation that there are internal quality assurance procedures in place for all education provision.</p>
<p>A statement confirming that the organisation has successfully undergone a review of higher education (including higher education provided on its behalf). Include link to the report(s).</p>	<p>Statement should be provided here.</p>
<p>If an organisation is working through review outcomes to address issues identified, please state this.</p>	<p>If existing regulated institutions are in the process of working through a review outcome to address issues identified, in accordance with normal procedures, we would expect them to set out in detail how they were addressing or planning to address those outcomes. We would expect these actions to be completed within 12 months.</p>
<p>A statement confirming that the organisation has successfully undergone a review/inspection(s) of its non-higher education (including non-higher education provided on its behalf). Include link to the</p>	<p>Statement should be provided here.</p>

<p>report(s) and information on the date of the review/ inspection.</p>	
<p>If an organisation is working through review/inspection outcomes to address issues identified, please state this.</p>	<p>If existing regulated institutions are in the process of working through a review/inspection outcome to address issues identified, in accordance with normal procedures, we would expect them to set out in detail how they were addressing or planning to address those outcomes. We would expect these actions to be completed within 12 months.</p>
<p>Confirmation that there are partnership agreements in place with all other bodies that either deliver education on its behalf or (where relevant) deliver qualifications that lead to one of its awards.</p>	<p>Yes / No The institution must complete the 'Locations' table in Annex B that evidences this.</p>
<p>If the institution is not regulated, it should provide a quality assurance statement signed by its governing body.</p>	<p>Submit the statement as part of the submission and reference the title of the document, as submitted, here.</p>

## Part Two: Fee and Access Plan (required for publication)

<b>Fee and Access Plan</b>	
Name of institution	Fee and access plans should be stand-alone documents and the name of the institution should be clearly set out.
Duration of the fee and access plan	The institution should specify the dates between which the institution will operate its 2022/23 academic year. We would normally expect this to be 1 August 2022 to 31 July 2023 for 2022/23 fee and access plan.
<b>Contents Page</b>	
Provide a list of contents	
<b>Executive Summary</b>	
<p>The institution should provide an executive summary setting out the main features of the plan and highlighting key priorities. Please limit the executive summary to no more than 1000 words. We will expect the summary to include the following:</p> <ul style="list-style-type: none"> <li>• the purpose and strategic objectives of the plan</li> <li>• the groups identified as under-represented in higher education</li> <li>• the fee income being invested to deliver the objectives as a percentage of the total full-time undergraduate.</li> </ul>	

<b>Section 1 - Fee levels</b>	
Section 1.1 – Fee levels or the determination of a fee level at each location	
<b>Fee level</b>	<b>Location of course</b>
Specify each fee level that will be charged by the institution.	<p>Set out:</p> <ul style="list-style-type: none"> <li>• each location that the fee listed in the left hand column will be charged at; and</li> <li>• the qualifications that will be delivered at those locations for that fee.</li> </ul> <p>Locations may include the institution’s campuses and locations of other charities delivering on the institution’s behalf.</p>
	<p>Set out:</p> <ul style="list-style-type: none"> <li>• each location that the fee listed in the left hand column will be charged at; and</li> <li>• the qualifications that will be delivered at those locations for that fee.</li> </ul> <p>Locations may include the institution’s campuses and locations of other charities delivering on the institution’s behalf.</p>
	<p>Set out:</p> <ul style="list-style-type: none"> <li>• each location that the fee listed in the left hand column will be charged at; and</li> <li>• the qualifications that will be delivered at those locations for that fee.</li> </ul> <p>Locations may include the institution’s campuses and locations of other charities delivering on the institution’s behalf.</p>
Specify each fee level that will be charged by the institution.	<p>Set out:</p> <ul style="list-style-type: none"> <li>• each location that the fee listed will be charged at; and</li> </ul>

	<ul style="list-style-type: none"> <li>• the qualifications that will be delivered at those locations for that fee.</li> </ul> <p>Locations may include the institution’s campuses and locations of other charities delivering on the institution’s behalf.</p> <hr/> <p>Set out:</p> <ul style="list-style-type: none"> <li>• each location that the fee listed will be charged at; and</li> <li>• the qualifications that will be delivered at those locations for that fee.</li> </ul> <p>Locations may include the institution’s campuses and locations of other charities delivering on the institution’s behalf.</p> <hr/> <p>Set out:</p> <ul style="list-style-type: none"> <li>• each location that the fee listed will be charged at; and</li> <li>• the qualifications that will be delivered at those locations for that fee.</li> </ul> <p>Locations may include the institution’s campuses and locations of other charities delivering on the institution’s behalf.</p>
<p>If the institution plans to determine, rather than specify, fee levels, it must set out here how that fee level will be calculated.</p>	

### Section 1.2 - Aggregate fee levels

The institution must include a statement to potential and current students that sets out either:

- the aggregate fees for completing the course and the basis for any potential fee increases for the duration of their course, or
- confirmation that there will be no fee increases for the duration of their course.

This statement must reflect all different fee levels charged and set out where this information will be provided by the institution.

### Section 2 - Student Partnership

The institution should set out how it has involved students in the development of this plan.

When assessing this section of the application we will expect to understand:

- how the institution identifies the views of its diverse student populations (not just the institution's sabbatical officers) and how those views have informed:
  - the plan's objectives,
  - the activities and services the institution is delivering, and
  - the under-represented groups the institution is supporting.
- how the institution feeds back to its students how it has responded to the priorities identified by its students, and
- whether the plan was informed by surveys of prospective students or as a result of Reaching Wider Partnership involvement.

If the institution has courses delivered on its behalf by another charity, or it delivers courses at multiple campuses, then we will expect the institution to explicitly reference how it has identified the priorities of those students.

Where particular activities are delivered in collaboration with students this should be clearly identified.

### Section 3 - Under-represented groups

List the under-represented groups the institution will support through its fee and access plan investment to improve equality of opportunity in Wales.

The groups should be separated into those groups identified by HEFCW as under-represented in higher education (these are listed in the supporting guidance document), those that will be supported through the institution's institutional contribution to the Reaching Wider Programme and those different groups identified by the institution as under-represented in HE.

We expect the institution to prioritise only those groups that it can most effectively support through its fee and access plan investment, this may mean that the institution cannot support all under-represented groups through plan investment.

### Section 4 - Objectives, underpinning activities and targets as they relate to supporting equality of opportunity and the promotion of HE

#### Section 4.1 - Equality of Opportunity

No.	Objective	Target(s) for 2022/23	Under-represented groups	Investment
1	<p>Objective identified by the institution.</p> <p>In setting objectives, the institution must take into consideration the general requirements that all fee and access plans must demonstrate how it will:</p> <ul style="list-style-type: none"> <li>attract applications from students who are members of under-represented groups</li> </ul>	<p>List the milestone target(s) that will be used to measure progress towards the long-term success of this objective.</p> <p>All targets will be set out with the required information in Annex B along with relevant longer-term targets.</p> <p>We expect the institution to include HEFCW National Measures as targets where relevant.</p>	<p>List the specific under-represented groups that will be supported through investment to meet this objective.</p> <p>Where the objective and target includes a National Measure target, ensure that the relevant under-represented groups being measured are included here.</p> <p>Where there is institutional Reaching Wider investment, the institutional Reaching Wider</p>	<p>Provide the proportion of tuition fee income invested to deliver this objective.</p>

	<ul style="list-style-type: none"> <li>• retain students who are members of under-represented groups.</li> <li>• make information on financial assistance available to students or prospective students.</li> </ul>		<p>under-represented groups should be clearly set out.</p> <p>Where the target is a collaborative target with the Reaching Wider Partnership, state the Reaching Wider under- representative group</p>	
<p>2</p>	<p>Objective identified by the institution.</p> <p>In setting objectives, the institution must take into consideration the general requirements that all fee and access plans must demonstrate how it will:</p> <ul style="list-style-type: none"> <li>• attract applications from students who are members of under-represented groups</li> <li>• retain students who are members of under-represented groups.</li> <li>• make information on financial assistance available to students or prospective students.</li> </ul>	<p>List the milestone target(s) that will be used to measure progress towards the long-term success of this objective.</p> <p>All targets will be set out with the required information in Annex B along with relevant longer-term targets.</p> <p>We expect the institution to include HEFCW National Measures as targets where relevant.</p>	<p>List the specific under-represented groups that will be supported through investment to meet this objective.</p> <p>Where the objective and target includes a National Measure target, ensure that the relevant under-represented groups being measured are included here.</p> <p>Where there is institutional Reaching Wider investment, the institutional Reaching Wider under-represented groups should be clearly set out.</p> <p>Where the target is a collaborative target with the Reaching Wider Partnership, state the Reaching Wider under- representative group</p>	<p>Provide the proportion of tuition fee income invested to deliver this objective.</p>

3	<p>Objective identified by the institution.</p> <p>In setting objectives, the institution must take into consideration the general requirements that all fee and access plans must demonstrate how it will:</p> <ul style="list-style-type: none"> <li>• attract applications from students who are members of under-represented groups</li> <li>• retain students who are members of under-represented groups.</li> <li>• make information on financial assistance available to students or prospective students.</li> </ul>	<p>List the milestone target(s) that will be used to measure progress towards the long-term success of this objective.</p> <p>All targets will be set out with the required information in Annex B along with relevant longer-term targets.</p> <p>We expect the institution to include HEFCW National Measures as targets where relevant.</p>	<p>List the specific under-represented groups that will be supported through investment to meet this objective.</p> <p>Where the objective and target includes a National Measure target, ensure that the relevant under-represented groups being measured are included here.</p> <p>Where there is institutional Reaching Wider investment, the institutional Reaching Wider under-represented groups should be clearly set out.</p> <p>Where the target is a collaborative target with the Reaching Wider Partnership, state the Reaching Wider under-representative group</p>	<p>Provide the proportion of tuition fee income invested to deliver this objective.</p>
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<b>Section 4.1.1 Activities and services to deliver each equality of opportunity objective in 2022/23</b>	
Objective 1	<p>For each objective, list all of the activities and services the institution plans to deliver in 2022/23 to make progress against each of the objectives set out in section 4.1.</p> <p>In our assessment of the list of activities and services it will need to be evident that the activities and services funded through the plan:</p> <ul style="list-style-type: none"> <li>• contribute to meeting the objective and related target(s)</li> <li>• support the under-represented groups targeted through this objective</li> <li>• support institutional institutional RW programme target groups, where appropriate</li> <li>• support students at all locations courses are being delivered by the institution or on its behalf, whether that is at the institution's different campuses or at the campus of another organisation delivering on the institution's behalf</li> <li>• take account of best practice</li> <li>• clearly identify institutional Reaching Wider Programme related activities</li> <li>• where appropriate, take account of the general requirement that each fee and access plan must make financial assistance available to students.</li> </ul> <p>Where this information is not evident we will discuss this with the institution.</p> <p>We would expect the activities and services to be set out in the following way:</p> <p>In 2022/23 we will:</p> <ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul>
Objective 2	<p>For each objective, list all of the activities and services the institution plans to deliver in 2022/23 to make progress against each of the objectives set out in section 4.1.</p> <p>In our assessment of the list of activities and services it will need to be evident that the activities and services funded through the plan:</p> <ul style="list-style-type: none"> <li>• contribute to meeting the objective and related target(s)</li> <li>• support the under-represented groups targeted through this objective</li> </ul>

	<ul style="list-style-type: none"> <li>• support institutional institutional RW programme target groups, where appropriate</li> <li>• support students at all locations courses are being delivered by the institution or on its behalf, whether that is at the institution’s different campuses or at the campus of another organisation delivering on the institution’s behalf</li> <li>• take account of best practice</li> <li>• clearly identify institutional Reaching Wider Programme related activities</li> <li>• where appropriate, take account of the general requirement that each fee and access plan must make financial assistance available to students.</li> </ul> <p>Where this information is not evident we will discuss this with the institution.</p> <p>We would expect the activities and services to be set out in the following way:</p> <p>In 2022/23 we will:</p> <ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul>
<p>Objective 3</p>	<p>For each objective, list all of the activities and services the institution plans to deliver in 2022/23 to make progress against each of the objectives set out in section 4.1.</p> <p>In our assessment of the list of activities and services it will need to be evident that the activities and services funded through the plan:</p> <ul style="list-style-type: none"> <li>• contribute to meeting the objective and related target(s)</li> <li>• support the under-represented groups targeted through this objective</li> <li>• support institutional institutional RW programme target groups, where appropriate</li> <li>• support students at all locations courses are being delivered by the institution or on its behalf, whether that is at the institution’s different campuses or at the campus of another organisation delivering on the institution’s behalf</li> <li>• take account of best practice</li> <li>• clearly identify institutional Reaching Wider Programme related activities</li> <li>• where appropriate, take account of the general requirement that each fee and access plan must make financial assistance available to students.</li> </ul>

	<p>Where this information is not evident we will discuss this with the institution.</p> <p>We would expect the activities and services to be set out in the following way:</p> <p>In 2022/23 we will:</p> <ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul>
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#### Section 4.2 - Promotion of higher education

No.	Objective	Target(s) for 2022/23	Investment
1.	Objective identified by the institution.	<p>List the milestone target(s) that will be used to measure progress towards the long-term success of this objective.</p> <p>All targets will be set out with the required information in Annex B along with relevant longer-term targets.</p> <p>We expect the institution to include HEFCW National Measures as targets where relevant.</p>	Provide the proportion of tuition fee income invested to deliver this objective
2.	Objective identified by the institution.	<p>List the milestone target(s) that will be used to measure progress towards the long-term success of this objective.</p> <p>All targets will be set out with the required information in Annex B along with relevant longer-term targets.</p> <p>We expect the institution to include HEFCW National Measures as targets where relevant.</p>	Provide the proportion of tuition fee income invested to deliver this objective

3.	Objective identified by the institution.	<p>List the milestone target(s) that will be used to measure progress towards the long-term success of this objective.</p> <p>All targets will be set out with the required information in Annex B along with relevant longer-term targets.</p> <p>We expect the institution to include HEFCW National Measures as targets where relevant.</p>	Provide the proportion of tuition fee income invested to deliver this objective
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**Section 4.2.1 Activities and services to deliver each promotion of higher education objective in 2022/23**

Objective 1	<p>For each objective, list all of the activities and services the institution plans to deliver in 2022/23 to make progress against each of the objectives set out in section 4.2.</p> <p>In our assessment of the list of activities and services it will need to be evident that the activities and services identified:</p> <ul style="list-style-type: none"> <li>• contribute to meeting the objective and related target(s)</li> <li>• support students at all locations courses are being delivered by the institution or on its behalf, whether that is at the institution's different campuses or at the campus of another organisation delivering on the institution's behalf</li> <li>• take account of best practice</li> <li>• meet the general requirement that each fee and access plan must make financial assistance available to students.</li> </ul> <p>Where this information is not evident we will discuss this with the institution.</p> <p>We would expect the activities and services to be listed in the following way:</p> <p>In 2022/23 we will:</p> <ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul>
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<p>Objective 2</p>	<p>For each objective, list all of the activities and services the institution plans to deliver in 2022/23 to make progress against each of the objectives set out in section 4.2.</p> <p>In our assessment of the list of activities and services it will need to be evident that the activities and services identified:</p> <ul style="list-style-type: none"> <li>• contribute to meeting the objective and related target(s)</li> <li>• support students at all locations courses are being delivered by the institution or on its behalf, whether that is at the institution’s different campuses or at the campus of another organisation delivering on the institution’s behalf</li> <li>• take account of best practice</li> <li>• meet the general requirement that each fee and access plan must make financial assistance available to students.</li> </ul> <p>Where this is not evident we will require an explanation from the institution which may result in amendments to the list.</p> <p>Where this information is not evident we will discuss this with the institution.</p> <p>In 2022/23 we will:</p> <ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul>
<p>Objective 3</p>	<p>For each objective, list all of the activities and services the institution plans to deliver in 2022/23 to make progress against each of the objectives set out in section 4.2.</p> <p>In our assessment of the list of activities and services it will need to be evident that the activities and services identified:</p> <ul style="list-style-type: none"> <li>• contribute to meeting the objective and related target(s)</li> <li>• support students at all locations courses are being delivered by the institution or on its behalf, whether that is at the institution’s different campuses or at the campus of another organisation delivering on the institution’s behalf</li> <li>• take account of best practice</li> <li>• meet the general requirement that each fee and access plan must make financial assistance available to students.</li> </ul>

Where this information is not evident we will discuss this with the institution.  
 We would expect the activities and services to be listed in the following way:  
 In 2022/23 we will:

- 
- 

### **Section 5 - Monitoring compliance with the general requirements of the 2022/23 fee and access plan**

Set out how the governing body will: monitor compliance with the general requirements, monitor fee levels and detail how the governing body will monitor progress, performance and the effectiveness of its plan against the objectives.

When assessing this we will expect to understand:

- Which groups or committees monitor the plan in the year to which the plan relates and afterwards to assess the institution's compliance with the plan
- The extent of governing body engagement and
- The involvement of students in the process, including students where education is provided on behalf of the institution.

### **Section 6- Evaluating the effectiveness of the 2022/23 fee and access plan**

The institution must explain how it will evaluate the effectiveness of its 2022/23 plan so that lessons can be learnt and the institution can demonstrate commitment to equity of outcomes.

We will expect the explanation to detail:

- The institution's evaluation framework and its implementation
- The roles of groups and committees that will evaluate the plan
- Any particular aspects of the 2022/23 plan that will be evaluated, including why these have been chosen
- What investment allocated to evaluation will be delivering.

## Part 3 – Evidence to HEFCW in support of fee and access plan application (not required for publication)

### Evidence to support fee and access plan application

#### Evidence and data to support the plan's objectives, targets and activities

We require the institution to submit evidence to make a case for its fee and access plan application.

In making its case we require the institution to explain:

- How the plan aligns to its mission.
- How each objective and target, aligns with key strategic documents, including its corporate strategy and underpinning strategies including its strategic equality plan.
- Which objectives and activities contribute to its region and civic mission.
- Where the institution has set objectives and targets that are different to the previous year's plan, the reasons for that.
- How previous monitoring exercises have informed the current plan.
- How impact assessments have informed the current plan.
- Where the institution is determining a fee the basis on which the fee has been determine.

#### Evidence and data to support the plan's focus on under-represented groups

In this section HEFCW will expect the institution to:

- Set out the data and evidence for why the institution is supporting, with fee and access plan investment, each of the under-represented groups listed in section 3 of part 2 of the fee and access plan application form.
- In its data and evidence, reference:
  - findings of the previous fee and access plan equality impact assessment which has informed the development of this plan,
  - the data, findings and/or priorities in the institution's strategic equality plan as this relates to groups with protected characteristics.
- Provide an explanation of where under-represented groups identified in this plan differ from groups identified in previous years and an explanation for this.

- Understand the under-represented groups the institution will support as part of its contribution to the HEFCW Reaching Wider Programme and, separately, any contribution to its regional Reaching Wider Programme Partnership.

We recognise that the institution may have to limit the number of under-represented groups it supports through fee and access plan investment to effectively support those groups.

SAMPLE

## Authorisation of the fee and access plan application to HEFCW (required for publication)

In authorising fee and access plan applications, the governing body:

- i. has seen and considered appropriate evidence to support the declarations being made in this application.
- ii. confirms that there has been appropriate consultation with its students, both those studying at the institution and at other providers where education is delivered on its behalf.
- iii. confirms that the information provided in this fee and access plan application is accurate and current, at the time of writing, and is based on verifiable data.
- iv. confirms that: **[delete one or more statements, as appropriate]**
  - a. it is acceptable for HEFCW to use financial, quality and/or other information/data that it holds about a currently regulated institution, regardless of whether the information/data was originally provided for purposes of regulation under the 2015 Act;
  - b. it is not acceptable for HEFCW to use financial, quality and/or other information/data that it holds about a currently regulated institution for purposes of regulation under the 2015 Act; and
  - c. it is submitting new, up-to-date, more recent information/data to inform HEFCW's assessment.
- v. understands that HEFCW reserves the right to undertake a visit to the institution to better understand eligibility related to the organisation and management of financial affairs, the data submitted on fee and access plans and/or the quality of education provided on, or on behalf of, the institution.
- vi. understands that it must provide HEFCW and/or HEFCW's agent, with information, assistance and access to its facilities and the facilities of other bodies providing higher education on its behalf.
- vii. understands that HEFCW may carry out, or arrange for an agent to carry out, a review relating to the quality of education provided by, or on behalf of the institution, and its governing body must take into account any advice given to it by HEFCW or the body appointed by HEFCW for this purpose.
- viii. confirms that all education provided by, or on its behalf, regardless of the level or location of the provision has been taken into account in this fee and access plan application.
- ix. confirms that the institution is at a low risk of failure on financial grounds over the medium- to long- term.

- x. confirms that the accounts are audited each year by a registered auditor and that the registered auditor is not the same firm and/or individual that prepared the accounts.
- xi. confirms that the institution complies with Competition and Markets Authority (CMA) guidelines for higher education.
- xii. understands that any financial commitments to students made in the fee and access plan, as approved by HEFCW, must be honoured.
- xiii. confirms that the institution will ensure that a copy of the fee and access plan can be made accessible to its students in any format.
- xiv. confirms that the institution will clearly signpost its students to HEFCW’s complaints processes.

<b>Fee and access plan application submission to HEFCW<sup>1</sup></b>	
Date of Governing Body approval:	
Governing Body authorised signature:	
Date:	
<b>Final fee and access plan submission once HEFCW has confirmed it has no further issues (where applicable)</b>	
Date of Governing Body approval:	
Governing Body authorised signature:	
Date:	

<sup>1</sup> Fee and access plans published on the institution’s websites must only include versions approved by HEFCW.

**Fee and access plan 2022/23****Fee income from home and EU domiciled full-time undergraduate and PGCE (QTS) students under the current fee regime**

**Institution name:**  
**Institution UKPRN:**

Please enter data in the yellow cells. All other cells have been locked. This is to prevent accidental alteration of the spreadsheet. If you need to view the formulae in any of these cells then it is possible to unlock each sheet by going to the Review ribbon and selecting Unprotect sheet. FAP22

**Guidance** for completing this table can be found on pages 34-43

**Forecast total full-time home and EU students and fee income 2022/23**

		Students	Fee income	Average fee
		No.	£	£
Franchised out / subcontracted	Full-time home and EU undergraduate sandwich year out			
	Full-time home and EU undergraduate year abroad			
	Full-time home and EU undergraduate other			
	Full-time PGCE (QTS)			
	Total	0	0	
Not franchised out / subcontracted	Full-time home and EU undergraduate sandwich year out			
	Full-time home and EU undergraduate year abroad			
	Full-time home and EU undergraduate other			
	Full-time PGCE (QTS)			
	Total	0	0	
<b>Total</b>		<b>0</b>	<b>0</b>	



**Fee and access plan 2022/23**  
**Financial forecasts**

**Institution name:**  
**Institution UKPRN:**

Please enter data in the yellow cells. All other cells have been locked. This is to prevent accidental alteration of the spreadsheet. If you need to view the formulae in any of these cells then it is possible to unlock each sheet by going to the Review ribbon and selecting Unprotect sheet. The password is **FAP22**.

Guidance for completing this table can be found on pages 34-43

Has the FAP been prepared on the basis of the approved forecast submitted to Welsh Government? Y/N		# Y complete table 1, if N complete table 2
--	--	---

1) Where forecasts submitted to Welsh Government are the basis for this template

<b>Income validation</b>		Forecast 2021-22
		£'000
Higher Education fees as per Table A code 15 of Welsh Government forecast submission*		
Fee income from "Fee income" sheet		0
<b>Variance</b>		-
<i>*excluding HEW/NHS</i>		
<b>Reconciling items, to explain variance above (please overwrite examples provided):</b>		
e.g. courses other than FTUG		-
		-
		-
		-
		-
		-
		-
		-
<b>Total reconciling items</b>		0
<b>Should equal nil</b>		0
<i>*a tolerance of +/- £5k has been applied to the validation</i>		

**OR**

2) Where the basis for this template is a new forecast approved by your Governing Body subsequent to the Welsh Government submission

	Estimate 2019-20 £'000	Forecast 2020-21 £'000	Forecast 2021-22 £'000	Forecast 2022-23 £'000
<b>Income</b>				
HE fees (Home & EU FTUG incl PGCE and education contracts)*	-	-	-	-
Other HE fees	-	-	-	-
WG grant	-	-	-	-
Other income	-	-	-	-
Total income	-	-	-	-
Full-time undergraduate income from franchise arrangements (where not included above)	-	-	-	-
<b>Total gross income (including franchisor)</b>	-	-	-	-
<i>*excluding HEW/NHS</i>				
<b>Expenditure</b>				
Total expenditure	-	-	-	-
Full-time undergraduate income from franchise arrangements - gross up in costs	-	-	-	-
<b>Total gross expenditure (including franchisor)</b>	-	-	-	-
<b>Surplus / (deficit) before other gains / (losses) and share of surplus / (deficit) in joint ventures and associates</b>	-	-	-	-
Other gains / (losses)	-	-	-	-
Tax	-	-	-	-
<b>Surplus / (deficit) for the year</b>	-	-	-	-
<b>Consolidated statement of cash flow</b>				
Surplus / (deficit) for the year (per above)	-	-	-	-
Adjustments to cash for non cash and investment and financing activities	-	-	-	-
Net cash flow from operating activities	-	-	-	-
Total cash flow from investing activities	-	-	-	-
Total cash flow from financing activities	-	-	-	-
Increase / (decrease) in cash and cash equivalents in the year	-	-	-	-
Cash and cash equivalents at beginning of the year	-	-	-	-
Cash and cash equivalents at the end of the year	-	-	-	-
<b>Income validation</b>				
Gross tuition fee and education contracts from above*				
Fee income from "Fee income" sheet				0
<b>Variance</b>				-
<i>*excluding HEW/NHS</i>				
<b>Reconciling items, to explain variance above (please overwrite examples provided):</b>				
e.g. courses other than FTUG				-
				-
				-
				-
				-
				-
				-
				-
<b>Total reconciling items</b>				-
<b>Should equal nil</b>				-
<i>*a tolerance of +/- £5k has been applied to the validation</i>				

Fee and access plan 2022/23			
Fee and access plan income forecast expenditure			
Institution name:			
Institution UKPRN:			
Forecast expenditure of the fee income returned in the 'Fee Income' sheet, provided against your chosen objectives, is to be returned in this table.			
Please enter data in the yellow cells. All other cells have been locked. This is to prevent accidental alteration of the spreadsheet. If you need to view the formulae in any of these cells then it is possible to unlock each sheet by going to the Review ribbon and selecting Unprotect sheet. The password is FAP22.			
Guidance for completing this table can be found on pages 34-43			
a) Equality of opportunity			
Objectives to improve equality of opportunity		2022/23	2021/22
Objectives from 2021/22 Fee and Access Plan		£	£
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
New objectives for 2022/23			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
		<b>Total</b>	<b>0</b>
Percentage of forecast investment to be spent on Equality of Opportunity			
b) Promotion of higher education			
Objectives to promote higher education		2022/23	2021/22
Objectives from 2021/22 Fee and Access Plan		£	£
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
New objectives for 2022/23			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
		<b>Total</b>	<b>0</b>
Percentage of forecast investment to be spent on Promotion of higher education			
If the 2022/23 proportions to be invested in a) or b) are different* from the 2021/22 proportions please provide commentary below:			
*A tolerance of +/- 1% has been applied to the validation			
c) Evaluation			
Investment in evaluating the effectiveness of fee and access plans		2022/23	2021/22
		£	£
d) Total forecast expenditure of 2022/23 fee and access plan investment. a) + b) + c)			
Total fee income		2022/23	2021/22
		£	£
Total investment (a) + b) + c)		0	0
Percentage of total fee income to be invested			
e) Reaching Wider			
Investment to support Reaching Wider Partnership		2022/23	2021/22
		£	£
f) Student financial support (already included in a) and b) above)			
		2022/23	2021/22
	£	Anticipated student numbers supported	Anticipated student numbers supported
Fee waivers			
Bursaries			
Scholarships			
Hardship funds			
Provision of financial management advice and skills			
Other financial support			
	<b>Total</b>	<b>0</b>	<b>0</b>
Percentage of forecast investment to be spent on student financial support			
If the proportion to be invested in 2022/23 is less* than in 2021/22 please provide commentary below:			
*A tolerance of +/- 1% has been applied to the validation			



<b>YesNo</b>	<b>Arrangement type</b>	<b>UKPRN</b>	<b>name_english</b>	<b>Courses of higher education</b>	<b>Activity</b>	<b>Target type</b>
Y	Franchise			Postgraduate	Learning and teaching	National measure
N	Subsidiary			Undergraduate	Research	Other institutional
	Validation			Further education		
	Other collaborative			Other	Other	