

Cylchlythyr | Circular

HEFCW review of teaching funding: Outcomes of stage two consultation

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To: Heads of higher education institutions in Wales
Principals of directly-funded further education institutions in Wales
Response by: No response required.
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This circular provides the outcomes of consultation circular [W22/11HE](#) which informed stage two of our review of teaching funding. The consultation provided information on proposed changes to our teaching funding methodology.

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Introduction

1. This circular provides the outcomes of consultation circular [W22/11HE](#) which informed stage two of our review of teaching funding. The consultation provided information on proposed changes to our teaching funding methodology.
2. Information on stage one of the review can be found in circular [W21/26HE](#), published in August 2021.

Background

3. Circular [W22/11HE](#) sought views on a number of potential changes to our teaching funding methodology. These changes predominantly focused on a new credit-based funding method, as well as changes to individual funding streams such as HEFCW's incentivisation premia, and the introduction of new cost groups to replace the former academic subject categories used in the current credit-based method.
4. The consultation outcomes, and corresponding actions proposed, are provided below.
5. Stages one and two of the teaching funding review have largely focused on the over-arching principles of the new funding method. We are intending to hold a stage three consultation with HEFCW-funded institutions from October 2022 which will focus on specific technical aspects of the new model such as the mapping of data to the cost groups.
6. It was clear from the responses to the stage two consultation that institutions wish to see the financial impact of our proposals. The exact funding implications for institutions will not be known until HEFCW's budget from Welsh Government is confirmed for 2023-24 and later years. However, we are able to model scenarios based on the funding available for this academic year 2022/23. We are planning to provide institutions with mapped data and scenario modelling as part of the stage three consultation.

Consultation outcomes

7. We received 11 responses to the consultation, which closed in June 2022. All of the responses received were from HEFCW-funded institutions. A summary of the response detail and a list of respondents can be found at **Annex A**.
8. Respondents generally supported the principle of using a new credit-based method to allocate core funding for teaching, supplemented by per capita funding and strategic incentivisation premium funding. The proposed elements of the model were generally understood, with some suggestions made for amendments, which have been reflected in the conclusions as appropriate.

9. Responses to the questions about cost groups provided suggestions for alternative groupings for some subjects and disciplines. We have outlined in this circular the changes we plan to make to the mapping as a result.
10. Respondents generally welcomed the idea of having strategic funding available, supplementary to the formulaic teaching funding model, as well as a move to greater parity between funding for full and part-time undergraduate provision.
11. Respondents also highlighted the importance of clarity over the operation of the funding methodology, and transparency of the funding allocations.

Q1: Do you agree that a credit-based model is an appropriate mechanism for providing teaching funding? If not, why not?

12. All responses agreed that a credit-based model was an appropriate mechanism for allocating teaching funding which is well understood within the sector and which could provide equity between students whatever their mode of learning.

Conclusion: We will continue to use a credit-based funding model to provide teaching funding to HEFCW funded institutions.

Q2: Do you agree with these elements of the model, if not, why not?

13. All responses agreed with the proposed elements of the credit-based model as outlined in the consultation. Responses suggested that the model would improve the balance between full-time and part-time funding, and the use of Higher Education Classification of Subjects (HECoS) codes would help ensure that funding was appropriately assigned to specific subject areas. One response suggested that the recovery period should be longer than one year.

Conclusion: We will proceed with the development of a credit-based model, as set out in the consultation. We have considered whether the recovery period should be longer than one year and have concluded that decreased recruitment for two years or longer would generally indicate a downward trend which should be reflected in the funding model. We have therefore decided not to amend this element of the model at this time.

Q3: Are there other elements you would like to see included, if so what are they, or are there any you would like to see removed, and why?

14. The majority of responses did not suggest any changes to the elements to be included in the credit-based model. One response suggested we should use HESA cost centres in the model instead of HECoS codes.

Conclusion: We have chosen to use HECoS codes rather than HESA cost centres, as assignment of departments to cost centres can vary by provider and cost centres are not used by FE providers with directly funded HE provision. The proposed cost group mapping is provided at **Annex B**.

Q4: Do you have any comments on the method used to map HECoS codes to cost groups? Do you agree with the mapping? If not, why not and are there particular

areas you find problematic, other than covered in your answers to the questions about particular HECoS codes and CAH groups below? What are these areas?

15. The responses to this question were mixed but overall were generally supportive of the method used to map HECoS codes and the resulting mapping output. Two responses repeated concerns over the use of Transparent Approach to Costing for Teaching (TRAC(T)) data as the basis of the mapping process but did not suggest alternative approaches. Other responses raised concerns over the outcomes of the mapping process for some subjects.

Conclusion: We consider that the consultation responses provided sufficient support for us to proceed with the methodology used in the mapping process as outlined in the consultation. We considered all the suggestions made for amendments to the mapping and have made amendments to the cost groups for some subjects where we considered it appropriate. The changes that we are making in addition to any outlined in the conclusions for questions 6a to 6g are listed below. These are areas where we felt a strong case was made for amending the mapping. A list of changes made to the original mapping is included in paragraph 24.

- CAH11 – Computing: all HECoS codes in this CAH level 1 will be included in cost group 3.
- CAH03-02 – Sports and exercise sciences: All HECoS codes in this CAH level 2 will be included in cost group 3.
- CAH02-02-03 – Pharmacy: all HECoS codes in this CAH level 3 will be included in cost group 2.

Q5: Are the relativities between cost groups appropriate? If not, why not?

16. The majority of respondents agreed that the relativities between cost groups were appropriate. There were comments about the mapping process for the cost groups, which are addressed later in this document. Some responses also repeated comments about needing to understand the impact of the changes on institutions individually before fully supporting the proposals.

Conclusion: We will proceed with the subject relativities as proposed in the consultation.

Q6a: Bioengineering, medical and biomedical engineering CAH level 3 (CAH10 01 06): In this group, HECoS codes are mapped to cost groups 2, 3 and 4. Are the mappings for the individual HECoS codes in this group appropriate, or should all HECoS codes in this CAH group be mapped to cost group 3? If there are mappings within this CAH level 3 that you think are not appropriate, which HECoS codes do you consider to be wrongly mapped and what do you think they should be mapped to and why?

17. Responses to this question were mixed. Some respondents provided no comment due to having no relevant provision in these subjects. Other responses suggested these subjects should be mapped to a single cost group, which should be either

cost group 2 or 3. It was suggested that Biomechanics should be re-coded from cost group 4 to a higher cost group, due to having a similar level of Engineering content as the other subjects which had mapped to a higher cost group.

Conclusion: Having reviewed the mapping again and considered the consultation responses, we have proposed that all engineering and technology subjects (CAH10) should be in a single cost group, and this cost group will be cost group 2. This would allow all engineering and technology subjects to be funded on the same basis and in the highest non-clinical cost group.

Q6b: Engineering and technology CAH level 1 (CAH10): the engineering and technology HECoS codes are primarily in cost groups 2 and 3. Do you consider the mappings for the engineering and technology HECoS codes to be to the right cost groups? Are there particular mappings for HECoS codes in engineering and technology that you have concerns about, and why?

18. Responses to this question were mixed. Several responses supported the mapping. The majority of responses which disagreed with the mapping for these HECoS codes suggested that the same cost group (cost group 2) should be used for all subjects in the grouping.

Conclusion: As above, we have proposed that all engineering and technology subjects (CAH10) should be in a single cost group, and this cost group will be cost group 2.

Q6c: Electrical and electronic engineering CAH level 3 (CAH10_01_08): two HECoS codes in this group are mapped to cost group 2 while the remaining codes are mapped to cost group 3. Would you consider that these two subjects cost more than the rest of the subjects in the CAH group, or should they also be in cost group 3? Please explain why.

19. Respondents generally felt that all engineering subject codes in CAH10_01_08 should be in the same group and this group should be cost group 2. One response suggested that electrical and electronic engineering should be in a higher cost group than cost group 2.

Conclusion: As above, we have proposed that all engineering-based subjects (CAH10) should be in a single cost group, and this cost group will be cost group 2.

Q6d: Physical geographical sciences CAH level 3 (CAH26_01_02): the HECoS codes in this CAH are mapped to a mixture of cost group 2 and cost group 4. HECoS codes in Human geography are mapped to cost group 4. Are there genuine cost differences between the codes in this CAH level 3, or should all codes in this CAH level 3 be in the same cost group? If in the same cost group, what cost group should that be (please explain why)?

20. Responses to this question were split: some considered that the mapping was correct and there were genuine cost differences between these subject codes. One response suggested there were no major costs differences between codes, but that these should all be in a higher cost group.

Conclusion: We are proposing to use cost group 3 for this subject, based on the consultation responses and as a compromise between cost group 2 and cost group 4.

Q6e: Tourism, travel and transport CAH level 3 (CAH17 01 06): the HECoS codes in this CAH level 3 group map to a mixture of cost groups 3, 4 and 5. Some of the HECoS codes have similar descriptions and therefore might be expected to be mapped to similar cost groups. Are there genuine cost differences between the codes within this CAH level 3 group or should they all be in the same cost group? If there are differences, would you consider that the HECoS codes are mapped to the right cost groups, or should changes be made, and why? If they should all be in the same cost group, what cost group should that be and why?

21. Responses to this question were split: some institutions offered no comment; some agreed that the mapping was appropriate. Others suggested that a single cost group should be used and this should be cost group 3 or 4.

Conclusion: We are proposing to use cost group 4 for this provision.

Q6f: Nursing and midwifery and Allied health, CAH level 2 (CAH02 04 and CAH02 06): These two CAH level 2 groups are primarily in cost group 4. Most of the HECoS codes in these groups were previously in ASC 2, which had a unit of funding for part-time undergraduate credit based funding which was about mid-way, if the units of funding were ranked from largest to smallest. This could be interpreted as this group of subjects being relatively less costly than previously. Is the mapping for these two CAH level 2 groups appropriate, and if not, why not, and are there particular HECoS codes it is not appropriate for?

22. Responses raised a number of queries regarding the mapping for these subjects. A few responses suggested that some of these subjects should be put into higher cost groups than had been proposed, but that others such as nursing and ophthalmics had been correctly mapped. One response urged HEFCW to be mindful that these subjects received funding from Health Education and Improvement Wales and to ensure there was alignment in terms of the strategic aims of the funding.

Conclusion: We will proceed with the cost group mapping for these subjects as outlined in the consultation. Much of this provision is directly funded by Health Education and Improvement Wales and we do not consider that there is sufficient evidence for us to amend the cost groups for these subjects at this time. We will continue to liaise with HEIW to discuss issues relating to the funding of this non-HEIW fundable provision in order to identify any future changes needed.

Q6g: Psychology CAH level 1 (CAH04): all codes in this CAH level 1 are mapped to cost group 5. Previously, the HECoS codes in this CAH level 1 group were mapped to ASC 3, Science, which was relatively more costly. Is the mapping to cost group 5 appropriate for all the HECoS codes in this CAH level 3 group? For any HECoS codes you think it is not appropriate for, which cost group should they be mapped to and why?

23. Responses generally disagreed with the proposed mapping for Psychology. The majority of responses felt that Psychology should be in a higher cost group than had been proposed due to it being an expensive subject to deliver, taking into account staff costs, staff/student ratios and laboratory equipment.

Conclusion: We propose to update the cost group for Psychology CAH level 1 HECoS codes. As such, these subjects will now be included in cost group 3.

24. In relation to questions 4 and 6a to 6g, below is a summary of the changes we have proposed to the cost group mapping compared to the original mapping presented in the consultation and having taken account of the consultation responses. The mapping from HECoS code to cost group is at Annex B. The final cost group mapping will be confirmed when the final funding model is published. Note that CAH refers to version 1.3.4 of the common higher aggregation hierarchy grouping of [HECoS codes](#). CAHXX refers to a CAH level 1 grouping, CAHXX-XX to CAH level 2 and CAHXX-XX-XX to CAH level 3. More information can be found on the [HESA website](#).

- CAH10 – Engineering and technology: all HECoS codes in this CAH level 1 will be included in cost group 2.
- CAH26-01-02 – Physical geographical sciences: all HECoS codes in this CAH level 3 will be included in cost group 3.
- CAH17-01-06 – Tourism, travel and transport: all HECoS codes in this CAH level 3 will be included in cost group 4.
- CAH04 – Psychology: all HECoS codes in this CAH level 1 will be included in cost group 3.
- CAH11 – Computer Science: all HECoS codes in this CAH level 1 will be included in cost group 3.
- CAH03-02 – Sports and exercise sciences: All HECoS codes in this CAH level 2 will be included in cost group 3.
- CAH02-02-03 – Pharmacy: all HECoS codes in this CAH level 3 will be included in cost group 2.

In addition to the changes listed above, we have made some minor changes to the model to tidy up areas where there were differences in the cost group mapping for HECoS codes within CAH level 3.

- HECoS code 101318 - Biodiversity conservation: moved to cost group 3 from cost group 2.
- HECoS code 101326 – Gerontology: moved to cost group 5 from cost group 4.

Q7: Are the tuition fees proposed to be used in the model appropriate? If not, why not, and what alternatives are there?

25. The responses to this question were split. Some institutions felt that the proposed tuition fee levels to be used in the model were appropriate. Others felt that fee levels for part-time undergraduate provision should be higher, to reflect higher rates charged by some institutions for some of this provision. A number of

responses seemed to indicate a lack of understanding as to how the fee levels would be used in the model.

26. In relation to postgraduate taught fees, a few responses suggested that further work would be needed to determine an appropriate fee for use in the model.

Conclusion: We will proceed to the third stage of the consultation using the tuition fee levels as proposed in the stage two consultation. We will endeavour to be clearer on how all the elements operate in the scenario models that we will share in the third stage of the consultation and also when we publish the final model. If postgraduate taught provision is included in the model in future, we will do further work on calculating appropriate fee levels.

Q8: Do you agree that we should include sandwich year out and language years abroad recruited credits as the proportion of the maximum full-time undergraduate tuition fee that is charged according to the regulations?

27. Responses to this question generally supported the proposal. One response suggested that all year-out credits should receive the same funding level as those students studying the full year and not undertaking a sandwich/placement year, in order to reflect the cost of servicing the year-out (providing staff support and meeting the educational needs of the student).

Conclusion: We will proceed to include sandwich year out and language years abroad recruited credits as the proportion of the maximum full-time undergraduate tuition fee that is charged according to the regulations.

Q9: Do you agree with the methodology to calculate the maximum number of funded credits before growth? If not, why not, and what do you suggest as an alternative?

28. Responses to this question generally supported the proposal. Other responses raised issues for HEFCW to consider when implementing the proposal, such as: ensuring the final methodology was clear and easy to understand; ensuring definitions used in the model were well-understood (e.g. such as 'completed module') and prioritising future growth of part-time provision where recovery is being made, following a period of decline.

Conclusion: We will proceed with the methodology to calculate the maximum number of funded credits before growth, as outlined in the consultation. We will ensure that all elements of the model are clearly explained when we publish the final method.

Q10: Does the recovery element work as a way of incentivising an increase in recruitment by ensuring that a one year dip in recruitment does not affect the funded credits for more than one year? If not, why not, and do you have any alternative suggestions?

29. The majority of respondents supported the idea of the recovery element, although a few responses did not agree that it would act as a recruitment incentive in and of

itself. One response suggested the recovery period should be longer than one year.

Conclusion: We will proceed with the inclusion of the recovery element in the final model. We will keep the recovery period under review.

Q11: Do you agree that the ability to provide funding for these two types of growth should be included in the model? If not why not, and would you suggest growth is included in a different way (please specify) or not at all?

30. Respondents were generally supportive of the proposal to provide funding for a conversion of fees only (where fees only are credits that are recruited above the current number of funded credits), and additional growth that can be added to the funded credits. One response suggested HEFCW should make allocations in line with institutional strategies and individual circumstances, rather than via a formulaic approach. Another response supported the proposal as long as it allowed for targeted growth.

Conclusion: We will proceed to include these two types of growth in the new model.

Q12: Do you agree that the possibility of an incentive should be included in the model? If so, is the proposed method a good way of doing this? If not, why not and what method would you suggest as an alternative?

31. Respondents were generally supportive of the proposal. One response suggested that any incentive needed to be strategic and made with sufficient notice for institutions to implement. Another response supported the proposal as long as it was clear which area the incentive would be offered in. A further response suggested that institutions might face challenges in affording and sustaining new provision, with only a year of growth included in the new model.

Conclusion: We will proceed to include the possibility of a recruitment incentive within the model, using the method outlined in the consultation.

Q13: Is there anything else you would like to see taken into account in the model? If so, what do you think should be included? Is there anything in the model you think shouldn't be in there? If so, what and why?

32. The majority of responses did not suggest anything else to include in the model. One response suggested that the methodology should consider how successful outcomes could be recognised and incentivised. Another response suggested that funding for start-up costs relating to new provision could be included in the model.

Conclusion: Successful student outcomes are a key focus of our regulatory approach. We will continue to review how our funding and regulatory functions are aligned, and how positive performance can continue to be incentivised. We will consider the suggestion to provide funding for start-up costs in any future strategic development funding opportunities.

Q14: Do you have any other comments on the inputs to be used in the model, or the outputs listed below?

33. Only one response provided a comment in relation to this question, suggesting that it would be useful if there was consultation regarding the incentive areas reflected in the model so that government priorities could be appropriately supported by the sector.

Conclusion: We will take this suggestion into account as part of our ongoing engagement with institutions.

Q15: Weighing up the advantages and disadvantages of HESES and EYM, what would be your preference to use in the model for recruited credits? (Noting that, for 2023/24 funding, using HESES would involve collecting HESES data for full-time and sandwich undergraduate provision as well as part-time undergraduate provision, for the 2022/23 academic year; and data extracted from the HESA student record for EYM would relate to the 2021/22 academic year.) Please explain your reasoning.

34. The responses to this question were balanced between HESES and EYM, with a slight preference for EYM. Responses provided reasons for supporting each method, and encouraged HEFCW to consider reducing burden in the final process. Responses cited the forthcoming implementation of Data Futures as a reason for reducing burden and workload. Some responses noted that HESES was more up to date, whilst EYM was consistent with other methodologies used in funding processes.

Conclusion: We will proceed with using EYM data in the model to calculate recruited credits, in order to reduce burden for providers and HEFCW, and to consistently use HESA data in funding. This has also been confirmed in the recently published HESES consultation (circular [W22/33HE](#)).

Q16: Assuming that in-year data are available, would you be content with a model that used a 12-month period of recruitment data rather than an academic year? If not, why not? What would you suggest as an alternative and what advantages would it have?

35. The majority of respondents agreed, albeit with some caveats, that a 12-month period of recruitment data would be preferable over an academic year's worth of data. A few responses favoured using academic year data over calendar year data, with one response suggesting it would better align with institutional administration and processes. Respondents said they would welcome further information on how the data collection process would operate and at what point in the year the data would be collected.

Conclusion: We plan to move to using a 12-month period of recruitment data in the model, rather than academic year data, when we can utilise in-year data collected by HESA. We will consult further on how this would operate in future.

Q17: Do you agree with the proposed way to calculate any adjustment to funding, as set out in paragraphs 64 and 69? If not, why not, and what do you suggest as an alternative?

36. The majority of respondents agreed with the proposal for calculating funding adjustments. One response suggested that the level of study should not be treated separately in the model. Another response suggested the model should allow for rapid growth.

Conclusion: We will proceed with the proposal to calculate adjustments to funding, as set out in the consultation.

Q18: Do you have any other comments or suggestions about recruitment data to be used in the model?

37. The majority of respondents did not have any further comments. The remaining responses cited burden as an issue, with one suggesting that burden could be reduced by exclusively using HESA data.

Conclusion: We will continue to keep under review our data collection requirements. The introduction of Data Futures could facilitate a reduction in burden in future, however any changes would be subject to engagement and consultation with providers.

Q19: Do you agree with our proposal to provide top-up funding for expensive subjects via the new credit-based method? Please explain your answer.

38. The majority of respondents agreed with our proposal to provide top-up funding for expensive subjects via the credit-based method. Respondents encouraged HEFCW to ensure that the funding provided via this method was no lower than currently provided via the expensive subject premium.

Conclusion: We will continue to provide funding for expensive subjects and use the credit-based method as the mechanism for this.

Q20: Do you agree with our proposal to provide top-up funding for higher cost subjects via the new credit-based method? Please explain your answer.

39. The majority of respondents agreed with our proposal to provide top-up funding for higher cost subjects via the credit-based method. One respondent could not fully endorse the proposal without understanding the impact it would have on the institution.

Conclusion: We will plan to use the credit-based model to provide funding for higher costs subjects, as outlined in the consultation.

Q21: Do you agree that we should continue to provide (disability) premium funding on this basis?

40. The majority of respondents agreed that we should to continue to provide premium funding in respect of students with disabilities. One response suggested we should

further simplify our funding methodology and consider removing the premium funding, with support provided via fee and access plans. Other responses highlighted potential difficulties relating to eligibility and students being able to access Disabled Students' Allowance funding.

Conclusion: We will continue to provide premium funding to institutions to recruit and support students with disabilities.

Q22: The level of funding associated with each student is currently £300. Do you agree that this amount is appropriate when calculating premium funding? If not, why not?

41. The responses to this question were evenly split, with some suggesting the amount was appropriate, and others suggesting that it should be at a higher level. One response suggested that we should consolidate disability premium funding within the credit-based method, and students with disabilities should be supported via fee and access plan investment instead. Several responses cited inflation, cost of living, and diagnostic assessment costs as reasons why the premium amount should be increased.

Conclusion: We support the aim, in principle, of increasing the amount of funding per student in the disability premium. However, this decision will be subject to budget availability as confirmed in future Welsh Government budgets for HEFCW.

Q23: What are your views on the possibility of amending the access and retention premium to include full-time undergraduate provision in addition to part-time undergraduate provision? Please explain your answer.

42. The responses to this question were split. There was some support for the expansion of the premium, however other responses did not agree with the proposal and suggested that the premium should continue to prioritise undergraduate, part-time provision only.

Conclusion: We have reflected on the consultation responses and are undertaking further modelling and analysis before reaching a final conclusion. We will confirm the outcomes of this work in due course.

Q24: Do you agree with our proposal to continue to use the geographical mappings used in 2022/23 funding allocations to categorise students included in the allocation into deprived and low participation areas? Please explain your answer.

43. The majority of respondents agreed with our proposal to use the 2022/23 geographical mapping in relation to deprived and low participation areas. One response suggested that the proposal would benefit students who did not live in Welsh Index of Multiple Deprivation 2019 areas. Another response suggested that HEFCW should consider an alternative definition of widening access, taking account of data collected through HESA.

Conclusion: We will proceed with our proposal to continue to use the geographical mappings used in the 2022/23 funding allocations in relation to

deprived and low participation areas. We will continue to engage with providers on issues affecting eligibility, including widening access, participation and population density issues.

Q25: Do you agree with our proposal to update the census data used in the mapping of postcodes to low participation areas from 2011 to 2021, when appropriate data are available? Please explain your answer.

44. All responses supported the proposal.

Conclusion: We will proceed as planned.

Q26: Do you agree with our proposal to continue using the proportion of Welsh domiciled students that are from quintiles 1 and 2 of WIMD19, at a 35% threshold, to categorise providers as widening access providers? Please explain your answer.

45. The majority of responses were in favour of using the 35% threshold to categorise providers as widening access providers. The remaining responses did not support the proposal and suggested the threshold should either be reduced or removed entirely.

Conclusion: We will proceed with our proposal to continue using the proportion of Welsh domiciled students that are from quintiles 1 and 2 of WIMD19, at a 35% threshold, to categorise providers as widening access providers.

Q27: Do you agree with our proposal to continue using the retention categories that are in the 2022/23 model? Please explain your answer.

46. The majority of responses supported the proposal to continue using the retention categories which were used in the 2022/23 model. One response supported the proposal but would wish to see the 35% threshold removed. One response disagreed with the proposal, instead suggesting we should remove the premium funding entirely, as noted elsewhere in the consultation responses, for the purpose of simplicity and reduction of burden.

Conclusion: We will continue to use the retention categories used in the 2022/23 model.

Q28: Do you agree with our proposal to increase the relative difference in funding rates between the two retention categories? If so, what difference would you suggest and why, and should it be the same for each geographical category, or, if not, please explain your answer?

47. The majority of responses to this question supported the proposal. One response agreed in principle and suggested that emphasising the importance of retention over recruitment was important to ensure that students were fully supported to progress well through their university studies. Other responses stated that they would welcome further information to understand the rationale and impact of the proposal.

Conclusion: We have reflected on the consultation responses and are undertaking further modelling and analysis before reaching a final conclusion. We will confirm the outcomes of this work in due course.

Q29: Do you agree with our proposal to retain the relative differences between the three rates of funding for the geographical groups (WIMD19 and a widening access provider, WIMD19 and not a widening access provider and low participation areas)? Please explain your answer.

48. The responses to this question were varied. A few responses welcomed the recognition that additional resources were sometimes needed to support and enable effective retention and progression for widening access students. One response did not understand the rationale for the relative differences, stating that the relative differences between “retained” and “not retained” should be comparable across all three groups.

Conclusion: We will retain the relative differences between the three rates of funding for the geographical groups (WIMD19 and a widening access provider, WIMD19 and not a widening access provider and low participation areas). There was sufficient support in the responses for us to continue with this method.

Q30: Do you agree that we should continue to offer per capita funding? Please explain your answer.

49. The majority of responses agreed that we should continue to offer per capita funding. Other responses suggested that the funding at its current level was ineffective and should be removed, increased, or allocated in a more strategic way.

Conclusion: We will continue to provide per capita funding for all taught levels and modes of study.

Q31: Do you agree with our proposal to provide per capita funding on the basis of a variable rate between modes and levels? Please explain your answer.

50. Responses to this question were mixed. The majority of responses supported the proposal to provide per capita funding on a varied basis, with the priority for part-time students. Responses in disagreement suggested the removal of the per capita funding entirely, as noted elsewhere.

Conclusion: We will continue to provide per capita funding on a fixed rate basis, as we do currently.

Q32: Do you agree that we should provide a greater level of per capita funding for part-time, undergraduate provision, with the rates for full-time undergraduate, full-time postgraduate and part-time postgraduate remaining the same? Please explain your answer.

51. Responses to this question were split, and generally reflected the responses to question 31, however the majority of responses supported the proposal to prioritise part-time, undergraduate provision in the per capita funding stream.

Responses in support of the proposal welcomed the intention to bring parity of funding to part-time and full-time study, with part-time undergraduate provision being more expensive to deliver.

Conclusion: As noted above, we will plan to continue to provide per capita funding on a fixed rate basis, as we do currently, for all taught modes of study.

Next steps

52. We are planning to hold a stage three consultation with funded institutions from October 2022. This will include more detailed modelling of the credit-based funding method and mapping of HESA end of year monitoring data to cost groups. The outcomes of stage three will inform both the final funding method and also the date from which the new funding method will be implemented.
53. The final funding method, once approved by the Council, will be published on the HEFCW website, with supporting information as to how the method will operate, what data will be used, what actions we will take to support institutions to transition to the new method and our plans to review the implementation of the new model.

Further information

54. For further information on the teaching funding review contact Nicola Hunt (029 2085 9735; nicola.hunt@hefcw.ac.uk).

Assessing the impact of our policies

55. HEFCW's Impact Assessment Policy and Procedures set out how we assess the likely impact – positive or negative – of proposed policies and practices with respect to meeting our responsibilities under:
 - The Equality Act 2010
 - The Welsh Language Standards 2018
 - The Well-being of Future Generations (Wales) Act 2015
56. We impact assessed the proposed changes outlined in the stage two consultation circular. The responses generally supported our proposals to prioritise access and retention, taking account of low participation areas and areas of deprivation. Responses also encouraged us to increase our funding for institutions in respect of students with disabilities, which we will keep under review and look to increase, subject to sufficient funding being available. Responses to the stage one consultation advised that Welsh Medium provision should remain a priority area for our funding. No new positive or negative impacts on the Welsh Language were raised in the responses to the stage two consultation.
57. We will keep our impact assessment under review to help safeguard against discrimination and promote equality. Contact equality@hefcw.ac.uk for more information about impact assessments.

Summary of responses - Stage two [consultation](#) on teaching funding

Number of respondents: 11

Key points:

- All but one of HEFCW's funded institutions responded. No other responses were received.
- A number of responses thanked us for our engagement with the sector in developing proposals.
- A few responses indicated some hesitation to fully support proposals without knowing the financial impact on funding allocations.
- There was broad agreement with the new model, the subject relativities and our proposals to continue to provide premium and per capita funding, with some caveats.
- The responses provided useful information in relation to the proposed cost groups, with suggestions for amendments to some groups.

Question 1: Do you agree that a credit-based model is an appropriate mechanism for providing teaching funding? If not, why not?

Yes: 11

Comments:

- Responses supported the proposal to continue to use a credit-based model as an appropriate mechanism for providing teaching funding, stating that HEFCW's credit-based funding enables institutions to deliver high quality provision and support student success, via a method which was well established and understood.

Question 2: Do you agree with these elements of the model, if not, why not?

Yes: 10

Yes with caveat:

No:

Don't know/not applicable/no comment: 1

Comments:

- Responses agreed with the key elements of the credit-based model in the consultation and welcomed the opportunity to simplify the model, noting that it could be applied to different funding scenarios for credit-bearing provision.
- One response suggested that the use of HECoS codes would help ensure that funding was correctly assigned to specific subject areas.
- One response suggested the model could improve the balance between full-time and part-time funding in the higher education sector.
- One response welcomed the credit recovery element of the model.

Question 3: Are there other elements you would like to see included, if so what are they, or are there any you would like to see removed, and why?

Yes: 1

Yes with caveat:

No: 10

Don't know/not applicable/no comment:

Comments:

- One institution suggested we should consider the use of HESA cost centres in the mapping process instead of HECoS groups.

Question 4: Do you have any comments on the method used to map HECoS codes to cost groups? Do you agree with the mapping? If not, why not and are there particular areas you find problematic, other than covered in your answers to the questions about particular HECoS codes and CAH groups below? What are these areas?

Yes: 2

Yes, with caveats: 5

No: 1

Don't know/not applicable/no comment: 3

Comments:

- The majority of responses supported the method used to map HECoS codes to cost groups.
- One response suggested that additional costs, such as laboratory time and equipment for practical subjects, were not fully accounted for in the mapping process.
- Two responses raised previous concerns at the use of TRAC(T) data as the basis of the mapping
- Other responses raised concerns over the outcomes of the mapping process for some subjects.

Question 5: Are the relativities between cost groups appropriate? If not, why not?

Yes: 5

Yes, with caveats: 3

No: 1

Don't know/Not applicable/no comment: 2

Comments:

- The majority of respondents agreed that the relativities between cost groups were appropriate.
- One response said the approach was fit for purpose and the refresh of cost relativities was long overdue. However the institution was concerned that Sport Science was priced too low due to the nature of their provision.
- One response indicated the institution was broadly happy but there were concerns about the financial impact of the proposals.
- Another response indicated the institution had some concerns about the subject allocations in the cost groups, particularly in comparison to the science and engineering based subjects.

- Another response said it was difficult to gauge the impact of the relativity of costs without the detail around the funding available, and there would likely be winners and losers using the new model.
- Another response suggested that any changes to cost groups should be considered in relation to the subject relativities as well.

Question 6a: Bioengineering, medical and biomedical engineering CAH level 3 (CAH10_01_06): In this group, HECoS codes are mapped to cost groups 2, 3 and 4. Are the mappings for the individual HECoS codes in this group appropriate, or should all HECoS codes in this CAH group be mapped to cost group 3? If there are mappings within this CAH level 3 that you think are not appropriate, which HECoS codes do you consider to be wrongly mapped and what do you think they should be mapped to and why?

Yes: 1

Yes, with caveats:

No: 4

Don't know/not applicable/no comment: 6

Comments:

- One response suggested that Biomechanics should be moved to a higher cost group from cost group 4, due to having a similar level of Engineering content as the other codes which were in a higher cost group in the mapping.
- One response suggested that all subjects in CAH10_01_06 should be coded to cost group 3, whereas another response suggested cost group 2 was more appropriate.
- The majority of the institutions in the 'no comment' category had no relevant provision.
- One response suggested that all subjects should be in one cost group but not if it would be at the detriment of an institution's funding allocation.

Question 6b: Engineering and technology CAH level 1 (CAH10): the engineering and technology HECoS codes are primarily in cost groups 2 and 3. Do you consider the mappings for the engineering and technology HECoS codes to be to the right cost groups? Are there particular mappings for HECoS codes in engineering and technology that you have concerns about, and why?

Yes: 3

Yes, with caveats:

No: 5

Don't know/not applicable/no comment: 3

Comments:

- The majority of 'no' responses felt that the same cost group (cost group 2) should be used for all subjects in the grouping. All other responses supported the mapping.

Question 6c: Electrical and electronic engineering CAH level 3 (CAH10_01_08): two HECoS codes in this group are mapped to cost group 2 while the remaining codes are mapped to cost group 3. Would you consider that these two subjects cost

more than the rest of the subjects in the CAH group, or should they also be in cost group 3? Please explain why.

Yes: 3

Yes, with caveats:

No: 4

Don't know/not applicable/no comment: 4

Comments:

- Respondents generally felt that all engineering codes in CAH10_01_08 should be in the same group and this group should be cost group 2.
- Other responses felt that the HECoS groups had been correctly mapped.
- One response felt that electrical and electronic engineering should be included in a higher cost group.

Question 6d: Physical geographical sciences CAH level 3 (CAH26_01_02): the HECoS codes in this CAH are mapped to a mixture of cost group 2 and cost group 4. HECoS codes in Human geography are mapped to cost group 4. Are there genuine cost differences between the codes in this CAH level 3, or should all codes in this CAH level 3 be in the same cost group? If in the same cost group, what cost group should that be (please explain why)?

Yes: 5

Yes, with caveats:

No: 1

Don't know/not applicable/no comment: 5

Comments:

- Responses to this question were split.
- One institution suggested that there were no major differences in costs between HECoS codes for physical geographical sciences.
- Other responses suggested the mapping was correct and there were different levels of costs between subjects.

Question 6e: Tourism, travel and transport CAH level 3 (CAH17_01_06): the HECoS codes in this CAH level 3 group map to a mixture of cost groups 3, 4 and 5. Some of the HECoS codes have similar descriptions and therefore might be expected to be mapped to similar cost groups. Are there genuine cost differences between the codes within this CAH level 3 group or should they all be in the same cost group? If there are differences, would you consider that the HECoS codes are mapped to the right cost groups, or should changes be made, and why? If they should all be in the same cost group, what cost group should that be and why?

Yes: 3

Yes, with caveats:

No: 4

Don't know/not applicable/no comment: 4

Comments:

- Responses to this question were split.
- Some institutions offered no comment, whilst others made suggestions for alternative cost groups for these subjects.
- Two responses suggested cost group 3 was more appropriate.
- One response suggested that subjects mapped to cost group 5 should be included in cost group 4.
- One response suggested using a single cost group for all codes.

Question 6f: Nursing and midwifery and Allied health, CAH level 2 (CAH02_04 and CAH02_06): These two CAH level 2 groups are primarily in cost group 4. Most of the HECoS codes in these groups were previously in ASC 2, which had a unit of funding for part-time undergraduate credit based funding which was about mid-way, if the units of funding were ranked from largest to smallest. This could be interpreted as this group of subjects being relatively less costly than previously. Is the mapping for these two CAH level 2 groups appropriate, and if not, why not, and are there particular HECoS codes it is not appropriate for?

Yes: 1

Yes, with caveats:

No: 6

Don't know/not applicable/no comment: 4

Comments:

- Responses raised queries over the mapping for some of these subjects.
- One response urged HEFCW to ensure that its funding for these subjects did not counter against the strategic aims of Health Education and Improvement Wales.
- One response suggested that the mapping for allied health was appropriate but that midwifery should be included in a higher cost group.
- Other responses suggested these subjects should be in higher cost groups.

Question 6g: Psychology CAH level 1 (CAH04): all codes in this CAH level 1 are mapped to cost group 5. Previously, the HECoS codes in this CAH level 1 group were mapped to ASC 3, Science, which was relatively more costly. Is the mapping to cost group 5 appropriate for all the HECoS codes in this CAH level 3 group? For any HECoS codes you think it is not appropriate for, which cost group should they be mapped to and why?

Yes:

Yes, with caveats:

No: 9

Don't know/not applicable/no comment: 2

Comments:

- The majority of responses suggested that Psychology should be mapped to a higher cost group than proposed due to it being an expensive subject to delivery, due to staff costs, staff/student ratios and laboratory/practical equipment.

Question 7: Are the tuition fees proposed to be used in the model appropriate? If not, why not, and what alternatives are there?

Yes: 4

Yes, with caveats: 3

No: 3

Don't know/not applicable/no comment: 1

Comments:

- Responses generally supported the fee levels used in the model.
- Some responses suggested that the part-time fee used in the model was too low.
- One response suggested the £9k fee for undergraduate provision did not reflect the cost of delivery in some areas, due to inflation.
- A few responses discussed postgraduate taught fee levels, with one suggesting that it would be difficult to determine a rate of fee for postgraduate taught provision, if this was used in the model in future.

Question 8: Do you agree that we should include sandwich year out and language years abroad recruited credits as the proportion of the maximum full-time undergraduate tuition fee that is charged according to the regulations?

Yes: 9

Yes, with caveats:

No:

Don't know/not applicable/no comment: 2

Comments:

- Responses were generally in support of the proposal.
- One response suggested that all year-out credits should receive the same funding level and that this should reflect the cost of servicing the year-out (providing staff support and meeting the educational needs of the students).

Question 9: Do you agree with the methodology to calculate the maximum number of funded credits before growth? If not, why not, and what do you suggest as an alternative?

Yes: 6

Yes, with caveats: 2

No: 1

Don't know/not applicable/no comment: 2

Comments:

- Responses were generally supportive of the proposal, with some caveats.
- One institution supported the proposal but suggested that there needed to be a clear, useable definition of 'a completed module'.
- Another response supported the rationale behind the proposal but felt that flexibility would be needed to take account of factors outside of the institution's control.
- One response supported the proposal but encouraged HEFCW to ensure it was not unnecessarily complicated as this would act against the principle of transparency.

Question 10: Does the recovery element work as a way of incentivising an increase in recruitment by ensuring that a one year dip in recruitment does not affect the

funded credits for more than one year? If not, why not, and do you have any alternative suggestions?

Yes: 6

Yes, with caveats: 3

No:

Don't know/not applicable/no comment: 2

Comments:

- Respondents were generally in agreement with the proposal to include a recovery element in the funding model.
- One response suggested that the recovery element was unlikely to act as an incentive in and of itself, however it would allow institutions to take this into account in their strategic planning, with the knowledge that a year of under-recruitment could be recovered in terms of funding.
- One response suggested that the suggested recovery period of a year was not long enough.

Question 11: Do you agree that the ability to provide funding for these two types of growth should be included in the model? If not why not, and would you suggest growth is included in a different way (please specify) or not at all?

Yes: 8

Yes, with caveats: 1

No:

Don't know/not applicable/no comment: 2

Comments:

- The majority of responses agreed with the proposal to include the ability to provide funding for growth within the model.
- Responses highlighted the importance of funding for growth being allocated in line with institutional strategies and to recognise existing provision.

Question 12: Do you agree that the possibility of an incentive should be included in the model? If so, is the proposed method a good way of doing this? If not, why not and what method would you suggest as an alternative?

Yes: 5

Yes, with caveats: 3

No: 1

Don't know/not applicable/no comment: 2

Comments:

- There was support for the proposal to include an incentive within the model.
- Responses suggested that any incentive would need to be flexible, strategic and that there would need to be clarity on which areas the incentive would be linked with.
- One response suggested that institutions could face challenges in affording and sustaining new provision and that an incentive element, if implemented, would need

to be kept under review to avoid any unintended consequences or possible destabilisation within the sector.

- Another response suggested that a better incentive to increase growth would be the allocation of additional funded credits.

Question 13: Is there anything else you would like to see taken into account in the model? If so, what do you think should be included? Is there anything in the model you think shouldn't be in there? If so, what and why?

Yes: 3

Yes, with caveats:

No: 4

Don't know/not applicable/no comment: 4

Comments:

- The majority of responses did not suggest anything else to include in the model.
- One response noted the ongoing review of Welsh medium costs of delivery and would welcome a higher level of premium for this provision.
- One response suggested that the funding methodology should consider how successful outcomes could be recognised and incentivised.
- One response suggested that funding for specific initiatives, such as start-up costs for new provision, would be welcomed.

Question 14: Do you have any other comments on the inputs to be used in the model, or the outputs listed below? Please provide detail.

Yes: 1

Yes, with caveats:

No: 10

Don't know/not applicable/no comment:

Comments:

- One response encouraged HEFCW to consult with the sector regarding the incentive areas in the model to ensure that institutions were able to support government priorities effectively. All other responses offered no additional comments.

Question 15: Weighing up the advantages and disadvantages of HESES and EYM, what would be your preference to use in the model for recruited credits? (Noting that, for 2023/24 funding, using HESES would involve collecting HESES data for full-time and sandwich undergraduate provision as well as part-time undergraduate provision, for the 2022/23 academic year; and data extracted from the HESA student record for EYM would relate to the 2021/22 academic year.) Please explain your reasoning.

HESES: 4

EYM: 5

Both: 1

Don't know/not applicable/no comment: 1

Comments:

- There was a small majority preference for the use of EYM data rather than HESES data in the new funding model.
- Responses in favour of EYM suggested that the use of EYM would help reduce burden and the workload associated with the production of HESES data, and better aligned with the introduction of Data Futures.
- Responses also preferred the use of EYM data which comprised actual data rather than HESES data which based on estimated values.
- Responses in favour of HESES noted the time lag in using EYM data in funding allocation processes.
- One response suggested that a blended approach of EYM and HESES would give greater flexibility for growth.

Question 16: Assuming that in-year data are available, would you be content with a model that used a 12-month period of recruitment data rather than an academic year? If not, why not? What would you suggest as an alternative and what advantages would it have?

Yes: 5

Yes, with caveats: 2

Either: 1

No: 2

Don't know/not applicable/no comment: 1

Comments:

- The majority of respondents agreed, albeit with some caveats, that a 12-month period of recruitment data would be preferable over an academic year's worth of data.
- Responses in support of a 12-month period of recruitment data noted that it would more accurately take account of provision which spanned traditional academic years. It would also align with the introduction of Data Futures.
- Responses in support of using academic year data noted that it aligned with university administrative processes and other reporting points.
- Other responses suggested that care would need to be taken about the exact point of data collection within the period and clarity would be welcomed on how the process would operate.

Question 17: Do you agree with the proposed way to calculate any adjustment to funding, as set out in paragraphs 64 and 69? If not, why not, and what do you suggest as an alternative?

Yes: 8

Yes, with caveats: 2

No:

Don't know/not applicable/no comment: 1

Comments:

- There was broad agreement for the proposed method of calculating funding adjustments.
- One response suggested that the level of study should not be treated separately in the method.
- Another response emphasised the need for the model to recognise growth.

Question 18: Do you have any other comments or suggestions about recruitment data to be used in the model?

Yes: 2

Yes, with caveats:

No: 9

Don't know/not applicable/no comment:

Comments:

- The majority of institutions did not provide further comments or suggestions about recruitment data to be used in the model.
- One response suggested that the use of data exclusively from HESA could reduce the burden associated with the HESES data collection.
- Another response highlighted burden in implementing the new model as a potential concern, ahead of the introduction of Data Futures.

Question 19: Do you agree with our proposal to provide top-up funding for expensive subjects via the new credit-based method? Please explain your answer.

Yes: 7

Yes, with caveats: 3

No:

Don't know/not applicable/no comment: 1

Comments:

- The majority of respondents agreed with the proposal to provide top-up funding for expensive subjects via the new credit-based method.
- Some responses sought assurance that existing funding levels for expensive subjects would be considered with the implementation of the new method.

Question 20: Do you agree with our proposal to provide top-up funding for higher cost subjects via the new credit-based method? Please explain your answer.

Yes: 9

Yes, with caveats: 1

No:

Don't know/not applicable/no comment: 1

Comments:

- All of the responses to this question supported the proposal to provide top-up funding for higher cost subjects via the new credit-based method.

- One institution suggested, in their response, that they would not fully endorse the proposal without seeing the impact of how funding would be distributed.

Question 21: Do you agree that we should continue to provide (*disability*) premium funding on this basis?

Yes: 7

Yes, with caveats: 2

No: 1

Don't know/not applicable/no comment: 1

Comments:

- The majority of responses supported the continuation of disability premium funding, as set out in the consultation.
- One response suggested that the funding methodology could be simplified and funding to support students with disabilities allocated via fee and access plan investment instead.

Question 22: The level of funding associated with each student is currently £300. Do you agree that this amount is appropriate when calculating premium funding? If not, why not?

Yes: 5

Yes, with caveats:

No: 5

Don't know/not applicable/no comment: 1

Comments:

- The majority of responses were split between agreeing that the amount was appropriate and suggesting that it should be higher.
- One response suggested that this funding should be consolidated with fee and access plan investment.
- Responses in support of a higher rate of funding cited living costs, assessment costs and inflation.

Question 23: What are your views on the possibility of amending the access and retention premium to include full-time undergraduate provision in addition to part-time undergraduate provision? Please explain your answer.

Yes: 3

Yes, with caveats: 2

No: 3

Don't know/not applicable/no comment: 3

Comments:

- Responses to this question were split.

- Responses in support of the proposal suggested that it would increase equity between full- and part-time modes of study and would recognise the additional support needed by eligible full-time students.
- Other responses welcomed the proposal, but only on the basis that additional funding was available to support the expansion.
- One response which disagreed with the proposal suggested that the stage one changes to the access and retention premium should be implemented first before further changes were made.

Question 24: Do you agree with our proposal to continue to use the geographical mappings used in 2022/23 funding allocations to categorise students included in the allocation into deprived and low participation areas? Please explain your answer.

Yes: 8

Yes, with caveats: 2

No:

Don't know/not applicable/no comment: 1

Comments:

- The majority of respondents supported the proposal.
- One response in support of the proposal suggested that this would recognise that there are students who do not live in WIMD40 areas who would benefit from the additional resource.
- Another response raised the issue of rurality and low population densities when considering funding methodologies based on geography.
- One response suggested that the postcode-based approach of widening access should be reviewed and consideration given to a broader definition of widening access, to take account of data collected through HESA.

Question 25: Do you agree with our proposal to update the census data used in the mapping of postcodes to low participation areas from 2011 to 2021, when appropriate data are available? Please explain your answer.

Yes: 11

Yes, with caveats:

No:

Don't know/not applicable/no comment:

Comments:

- All responses were in agreement

Question 26: Do you agree with our proposal to continue using the proportion of Welsh domiciled students that are from quintiles 1 and 2 of WIMD19, at a 35% threshold, to categorise providers as widening access providers? Please explain your answer.

Yes: 7

Yes, with caveats:

No: 4

Don't know/not applicable/no comment:

Comments:

- The majority of responses supported the proposal to continue using the proportion of Welsh domiciled students that are from quintiles 1 and 2 of WIMD19, at a 35% threshold, to categorise providers as widening access providers.
- The remaining responses did not support the proposal, suggesting that institutional location and size of institution were factors affecting the success of institutions to be able to recruit widening access students.
- One response suggested that the Welsh sector average be used as the threshold, instead of the proposed level of 35%.

Question 27: Do you agree with our proposal to continue using the retention categories that are in the 2022/23 model? Please explain your answer.

Yes: 9

Yes, with caveats: 1

No: 1

Don't know/not applicable/no comment:

Comments:

- The majority of responses agreed with the proposal.
- One response suggested the removal of access and retention premium funding, with resource provided via fee and access plan investment instead.
- One response supported the proposal but suggested that the 35% threshold, as noted in question 26, could be removed.

Question 28: Do you agree with our proposal to increase the relative difference in funding rates between the two retention categories? If so, what difference would you suggest and why, and should it be the same for each geographical category, or, if not, please explain your answer.

Yes: 6

Yes, with caveats: 2

No: 1

Don't know/not applicable/no comment: 2

Comments:

- There was support from respondents for the proposal to increase the relative difference in funding rates between the two retention categories.
- One response supported the proposal in principle, highlighting the importance of ensuring an appropriate emphasis on retention and student success.
- Another response in agreement suggested the proposal was appropriate, given the differences between the two categories and the complexity of WIMD in particular.
- Other responses indicated they would welcome more information on the rationale behind the proposal.

Question 29: Do you agree with our proposal to retain the relative differences between the three rates of funding for the geographical groups (WIMD19 and a widening access provider, WIMD19 and not a widening access provider and low participation areas)? Please explain your answer.

Yes: 6

Yes, with caveats:

No: 2

Don't know/not applicable/no comment: 3

Comments:

- Responses indicated support for the proposal, with those in favour suggesting that there were often specific challenges and resource implications for institutions to support student from widening access backgrounds.
- One response repeated its earlier view for the simplification of funding.
- One response in disagreement suggested that it was not clear why there were three rates of funding for the geographical groups.
- One response suggested that the funding level should be dependent on whether or not the student came from an area of deprivation as recognised in the lowest quintiles of WIMD.

Question 30: Do you agree that we should continue to offer per capita funding? Please explain your answer.

Yes: 7

Yes, with caveats: 1

No: 1

Don't know/not applicable/no comment: 2

Comments:

- The majority of responses supported the continuation of per capita funding.
- Other responses suggested that the current level of funding was too low to be effective.
- One response suggested the funding be used in a more strategic way, for example to support initiatives aimed at women in STEM, or to support new provision.

Question 31: Do you agree with our proposal to provide per capita funding on the basis of a variable rate between modes and levels? Please explain your answer.

Yes: 6

Yes, with caveats:

No: 4

Don't know/not applicable/no comment: 1

Comments:

- The majority of responses to this question agreed with the proposal to provide per capita funding on the basis of a variable rate between modes and levels.

- Some responses disagreed with the proposal, or suggested that per capita funding should be removed entirely, as its effectiveness was unknown.
- Other responses welcomed the suggestion of a variable rate of per capita funding that prioritised part-time students.

Question 32: Do you agree that we should provide a greater level of per capita funding for part-time, undergraduate provision, with the rates for full-time undergraduate, full-time postgraduate and part-time postgraduate remaining the same? Please explain your answer.

Yes: 7

Yes, with caveats:

No: 4

Don't know/not applicable/no comment:

Comments:

- The majority of responses to this question agreed with the proposal to provide a greater level of per capita funding for part-time, undergraduate provision.
- One response welcomed the intention to aim for greater parity of funding for part-time and full-time provision.
- Other responses suggested that the current level of per capita funding for part-time, undergraduate provision should be increased in order to address higher costs associated with delivering part-time courses.

Respondents

Aberystwyth University

Bangor University

Cardiff University

Cardiff Metropolitan University

Grŵp Llandrillo Menai

NPTC Group

Open University

Swansea University

University of South Wales

University of Wales Trinity Saint David

Wrexham Glyndŵr University