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6 May 2022

Dear the Rt Hon Michelle Donelan MP,

Universities Wales recognises that the UK Government's proposals on higher education funding and support relate to students and providers in England. However, given the cross border flow of students and the operation of higher education across the UK, these proposals would inevitably have implications for Welsh students and providers.

This letter represents our response to the consultations on Higher Education Reform and the Lifelong Loan Entitlement and is to confirm our support for the views expressed in UUK's response, to which universities in Wales have contributed, and to provide further comments that the UK Government may wish to consider.

In particular, to raise issues relating to cross-border arrangements that may need to be considered in the context of the proposed policy reforms in England. There is a considerable flow of students across the England-Wales border in both directions. This movement is underpinned by a range of motivations including course selection, specialised facilities, and location which may include proximity to home.

The consultation sets out an ambition to improve student choices and deliver better outcomes. Ensuring that students have the ability to study at providers across the UK helps ensure that students are able to choose the course and institution that best fits their needs and ambitions.

These cross-border arrangements expand the opportunities for UK students and are critical in more specialist subject areas which are only offered by a small number of institutions. For example, a comparatively high proportion of English-domiciled students studying in Wales are studying science subjects. Wales is particularly important for providing higher education to English students in geography, earth and environmental sciences, biological sciences, and sport and exercise sciences.

The economic importance for England of facilitating cross-border flow should not be overlooked: the multiplier effects from the fee revenue and off-campus student expenditure makes a significant further contribution to economic growth (GDP) and the generation of employment. While the economic impact may be felt most keenly in English regions with a high intake of students from Wales, the most

recent research suggests that the impact is in fact likely to be widespread and significant for all UK regions. It will play a key part in the UK Government's levelling up ambitions.

We assume that UK Government will want to implement the proposed changes in ways that continue to support English students in receiving the best possible higher education for them, wherever it is based in the UK.

This means that the UK and devolved governments will need to work together to avoid creating unnecessary barriers to the flow of students across the internal boundaries of the UK, particularly where higher education and student support policy approaches diverge. Effective planning and implementation of cross-border arrangements will be critical.

In this light, the policy proposals contain a number of potential risk areas for cross-border arrangements where a coordinated UK approach could compliment rather than hinder different approaches between countries:

The consultation outlines proposals relating to minimum eligibility requirements (MERs) for students in England. We support the positions outlined in UUK's response including the ways in which minimum eligibility requirements could impact UK Government's aims on levelling up. We strongly support the recommendations UUK make including lowering the proposed mature student exemption to 21 which is consistent with the long-standing definition of mature learners used by regulators across the UK.

Separately, you have sought views on the introduction of the Lifelong Loan Entitlement. As England seeks to move to a more flexible modular approach, the facilitation of cross-border study will be even more valuable and important. At modular level, there could be significant benefits for provision of strategically important and vulnerable subjects. Maths and science modules often form a critical component of a range of degree programmes, for instance.

For students, there are clear benefits from having access to the wide range of specialities in individual universities, wherever they are located in the UK. There are also potential benefits for employers, as many companies have staff located across the UK, and it would be helpful if they could access the right modules wherever in the UK they are based.

As noted in UUK response, there are potential benefits but also significant risks that would need to be managed in seeking to implement the LLE. Here we confine our comments to highlighting the need for further development of the proposals to ensure the LLE should not unintentionally (or otherwise) preclude English-domiciled students from pursuing study at institutions in other UK countries.

Future data requirements and collection processes will clearly be instrumental to the scheme. At the moment, the OfS makes limited use of module data (as highlighted by the OfS in its recent consultation) but in Wales module data is used by HEFCW in its funding allocations for universities, for instance. Further work should be undertaken on the credit size of modules that will be supported through the LLE as there is a range of module sizes used across the UK. For example, some providers structure their provision in 20 credit modules rather than 30.

Access to course information will be important for student choice. A UK approach is currently taken to providing access to information on courses and centralised applications at course level. We would be keen to ensure that devolved nations are involved in any development of systems to ensure students can access information on eligible modules which facilitates the pursuit of education across the UK.

Across the various proposals, supporting students to choose the course and provider that is the best fit for them will be crucial in realising the UK Government's aims while also best supporting the student. The cross-border flow of students across the UK brings benefits across the board and, as highlighted, there will be a need for discussion and development of the proposals to help ensure that these benefits, including access to specialist subject provision, are retained.

We look forward to working with you and other stakeholders on how best to address the issues raised by the consultations and ensuring opportunities and choices for students that benefit people and places across the UK.

Kind regards



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